Q. [Account IO3 - Insulators] - Please fully explain and justify why the Canadian peer group value for insulators is 37 years, yet Hydro proposes a 30-year average service life for the investment in Account IO3 - Insulators. The response should specifically distinguish, explain, and document the basis for why Hydro's insulators are anticipated to have a much shorter average service life than the 37-year peer group value set forth on page III-6 of the 2009 Gannett Fleming study.

A.

The average service life of insulators is impacted by the environmental conditions to which they are exposed. In particular, the influence of the coastal environment results in an increased amount of corrosion as compared to the life indications of non-coastal installations. Of the Canadian utilities used in the peer group, only one utility – Newfoundland Power – would be subjected to similar types of coastal environmental issues. As such, it would be fully expected that the average service life of insulators would be longer in the circumstance of most of the peer group. In particular, the average service life estimate for insulators for Newfoundland Power is 31 years, which is comparable to the 30-year estimate being proposed by Hydro in this proceeding.