Q. [Account W01 - Water Regulating Structures] - Regarding the statement that operating staff indicated that a 45- to 55-year life should be used for the investment in Account W01 - Water Regulating Structures as set forth in CA-NLH-150, provide a detailed narrative identifying the basis for operating staff's position as well as all corresponding studies and documents to support such position, including all meaningful and significant factors. Further, specifically indicate why a 70- and 80-year average service life is also not appropriate. To the extent operating staff believe that 70- or 80-year average life expectations are not also reasonable, provide all support, justification and underlying documentation associated with such position, including all meaningful and significant factors.

A.

The operations group was provided a preliminary version of the results of the retirement rate analysis in order to provide comment and to verify the reasonableness of the preliminary estimates. The operations group provided a check of the reasonableness of Gannett's recommendations based on their experience and knowledge of the system and their comments were not based on any specific documentation. The Hydro operations group rely on the professional expertise of Mr. Kennedy in developing lowa curve fits, and are not in a position to offer comment on the comparability of the characteristics of the differing lowa curve fits.