

1 Q. Please explain specifically why Hydro's operations personnel do not think it is likely
2 for dams to live more than 100 years.

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5 A. Hydro's embankment dams are very similar to thousands of embankment dams in
6 the United States and Canada. This applies to the embankment materials used,
7 construction techniques, foundation conditions and grouting techniques. Based on
8 the knowledge of the operations personnel, the industry experience is that the
9 maximum anticipated life for properly designed, constructed, maintained and
10 operated embankment dams is 100 years. There is nothing of note on Hydro's dams
11 that would lead Hydro's operations personnel to believe that their anticipated
12 useful life would be longer than this industry experience.