Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Survivor Curve Changes) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 364.00, Distribution Plant "POLES, TOWERS AND FIXTURES". What caused the company to propose a decreased survivor curve of 48-R0.5 compared to current survivor curve 53-R0.5?

Response:

First, it is important to recognize the 53-R0.5 Iowa Survivor Curve is the result of a settlement, not what was proposed in the prior Depreciation Study as of December 31, 2016, as most reflective of the expectations for these assets as of December 31, 2016. The Iowa Survivor Curve proposed in the prior Depreciation Study was the 50-R0.5.

The plant activity recorded since December 31, 2016, which is reflected on pages VII-28 through VII-34 of Exhibit CLP-DEPRECIATION-3, at pages 82-88, indicates a shorter service life than in the previous study and when compared to the current 53-R0.5 estimate. The 48-R0.5 Iowa Survivor Curve, shown on page VII-28 of the Depreciation Study, provided at Exhibit CLP-DEPRECIATION-3, at page 82, is a very good fit to the historical retirement activity through age 54 and reflects the expectation that a substantial portion of the future retirements recorded to assets in this Account will be made to assets of ages greater than 54 years. This estimate also incorporates increasing levels of replacements for reasons such as reliability, capacity, and pole inspections.