

## Attachment C

1 UNITED STATES OF AMERICA  
2 BEFORE THE  
3 FEDERAL ENERGY REGULATORY COMMISSION

4 New York Independent System ) Docket No. ER17-\_\_\_\_-000  
5 Operator, Inc. )  
6

7 PREPARED DIRECT TESTIMONY OF DANE A. WATSON ON BEHALF OF  
8 THE NEW YORK POWER AUTHORITY  
9

10 Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

11 A. My name is Dane A. Watson. I am a Partner of Alliance Consulting Group. Our  
12 business address is 101 E. Park Blvd., Suite 220, Plano, TX 75074. Alliance  
13 Consulting Group provides consulting and expert services to the utility industry.  
14

15 I. POSITION AND QUALIFICATIONS

16 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

17 A. I hold a Bachelor of Science degree in Electrical Engineering from the University of  
18 Arkansas at Fayetteville and a Master's Degree in Business Administration from  
19 Amberton University.  
20

21 Q. DO YOU HOLD ANY SPECIAL CERTIFICATION AS A DEPRECIATION  
22 EXPERT?  
23

24 A. Yes. The Society of Depreciation Professionals ("SDP") has established national  
25 standards for depreciation professionals. The SDP administers an examination and  
26 has certain required qualifications to become certified in this field. I met all  
27 requirements and hold a Certified Depreciation Professional certification.

1   **Q.    PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

2   **A.**    Since graduation from college in 1985, I have worked in the area of depreciation and  
3           valuation. I founded Alliance Consulting Group in 2004 and am responsible for  
4           conducting depreciation, valuation, and certain accounting-related studies for clients  
5           in various industries. My duties related to depreciation studies include the assembly  
6           and analysis of historical and simulated data, conducting field reviews, determining  
7           service life and net salvage estimates, calculating annual depreciation, presenting  
8           recommended depreciation rates to utility management for its consideration, and  
9           supporting such rates before regulatory bodies.

10               My prior employment from 1985 to 2004 was with Texas Utilities Electric  
11           Company and successor companies (“TXU”). During my tenure with TXU, I was  
12           responsible for, among other things, conducting valuation and depreciation studies for  
13           the domestic TXU companies. During that time, I served as Manager of Property  
14           Accounting Services and Records Management in addition to my depreciation  
15           responsibilities.

16               I have twice been Chair of the Edison Electric Institute (“EEI”) Property  
17           Accounting and Valuation Committee and have been Chairman of EEI’s Depreciation  
18           and Economic Issues Subcommittee. I am a Registered Professional Engineer (“PE”)  
19           in the State of Texas and a CDP. I am a Senior Member of the Institute of Electrical  
20           and Electronics Engineers (“IEEE”) and have held numerous offices on the Executive  
21           Board of the Dallas Section of IEEE as well as national and worldwide offices. I  
22           have twice served as Past President of the Society of Depreciation Professionals most  
23           recently in 2015. I also teach depreciation seminars on an annual basis for EEI and

1 the American Gas Association (both basic and advanced levels) and I developed and  
2 teach the advanced training for the Society of Depreciation Professionals and other  
3 venues.

4  
5 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY REGULATORY**  
6 **COMMISSIONS?**

7 A. Yes. In my 32 year career, I have conducted more than 190 depreciation studies and  
8 testified before approximately 35 regulatory commissions across the United States. A  
9 listing of the various proceedings in which I have appeared is provided in Exhibit No.  
10 NYP-002. I also appeared in Federal Energy Regulatory Commission ("FERC")  
11 Docket No. RM02-7-000 as an industry panelist on asset retirement obligations.

12  
13 **II. PURPOSE AND SUMMARY OF TESTIMONY**

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

15 A. The Alliance Consulting Group was retained by the New York Power Authority  
16 ("NYPA") to conduct a depreciation rate study ("Depreciation Study") for assets  
17 subject to the Commission's jurisdiction. The purpose of my testimony is to sponsor  
18 and explain the recent Depreciation Study completed for NYPA and to support and  
19 justify the recommended depreciation rate changes for NYPA's facilities based on the  
20 results of the Depreciation Study.

1    **Q.    ARE YOU SPONSORING ANY EXHIBITS IN THIS PROCEEDING?**

2    **A.**    Yes. I am sponsoring the Depreciation Study conducted by Alliance Consulting  
3            Group for NYPA. The Depreciation Study is Exhibit No. NYP-003.

4

5    **Q.    WAS THE NYPA DEPRECIATION STUDY PREPARED BY YOU OR**  
6            **UNDER YOUR SUPERVISION AND CONTROL?**

7    **A.**    Yes.

8

9    **Q.    PLEASE SUMMARIZE YOUR RECOMMENDATIONS REGARDING**  
10           **DEPRECIATION EXPENSE.**

11           **A.**    This study recommends a set of new depreciation rates that will result in an overall  
12               decrease in annual depreciation expense for transmission and general plant compared  
13               to rates currently in effect. The table on pages 14-17 of my testimony provides the  
14               recommended rates for current projects/locations and accounts. Exhibit No. NYP-  
15               003, Appendix A shows the computation of the proposed depreciation rates. Exhibit  
16               No. NYP-003, Appendix B demonstrates the change in depreciation expense for the  
17               various accounts if the proposed depreciation rates were applied to 2015 plant  
18               balances. The table on pages 18-19 shows the depreciation rates that should be  
19               applied to new projects that are not covered by the proposed depreciation rates for  
20               existing projects/locations. These rates would also apply to new plant that is added to  
21               accounts for a particular project where NYPA lacked depreciable plant as of  
22               12/31/2015 (or all plant has been fully depreciated). The “new project” rates are  
23               based on the life and net salvage parameters used for the existing projects/locations  
24               and accounts.  
25

26

1 **Q. WHAT ARE THE PRIMARY FACTORS THAT HAVE INFLUENCED THE**  
2 **CHANGE IN NYPA’S DEPRECIATION RATES?**

3 **A.** The primary factors influencing the change in depreciation rates are changes in the  
4 terminal retirement dates for transmission assets and the lives for general plant assets.  
5 These factors decreased depreciation expense for both Transmission and General  
6 assets.

7  
8 **III. DEVELOPMENT OF DEPRECIATION RATES FOR NYPA**

9 **Q. WHY ARE DEPRECIATION STUDIES NEEDED FOR ACCOUNTING AND**  
10 **RATEMAKNG PURPOSES?**

11 **A.** Over time, life and net salvage characteristics of various assets may change. The  
12 purpose of updating depreciation studies periodically is to ensure the most accurate  
13 possible projection of future lives and net salvage to appropriately recover the costs  
14 of assets over their lives.

15  
16 **Q. WHAT ARE THE STEPS INVOLVED IN CONDUCTING A DEPRECIATION**  
17 **STUDY?**

18 **A.** This depreciation study encompassed four distinct phases. The first phase involved  
19 data collection and field interviews. The second phase was where the initial data  
20 analysis occurred. The third phase was where the information and analysis was  
21 evaluated. Once the first three stages were complete, the fourth phase began. This  
22 phase involved the calculation of depreciation rates and documenting the  
23 corresponding recommendations.

24 During the Phase 1 data collection process, historical data was compiled from  
25 continuing property records and general ledger systems. Data was validated for

1 accuracy by extracting and comparing to multiple financial system sources. Audit of  
2 this data was validated against historical data from prior periods, historical general  
3 ledger sources, and field personnel discussions. This data was reviewed extensively  
4 to put it in the proper format for a depreciation study. Further discussion on data  
5 review and adjustment is found in the Salvage Analysis section of the study. Also as  
6 part of the Phase 1 data collection process, numerous discussions were conducted  
7 with engineers and field operations personnel to obtain information that would assist  
8 in formulating life and salvage recommendations in this study. One of the most  
9 important elements of performing a proper depreciation study is to understand how  
10 the company utilizes assets and the environment of those assets. Interviews with  
11 engineering and operations personnel are important ways to allow the analyst to  
12 obtain information that is beneficial when evaluating the output from the life and net  
13 salvage programs in relation to NYPA's actual asset utilization and environment.  
14 Information that was gleaned in these discussions is found both in the Detailed  
15 Discussion (starting on page 11) of this study in the Life Analysis and Salvage  
16 Analysis sections.

17 Phase 2 is where the actuarial analysis is performed. Phase 2 and 3 overlap to a  
18 significant degree. The detailed property records information is used in Phase 2 to  
19 develop observed life tables for life analysis. These tables are visually compared to  
20 industry standard tables to determine historical life characteristics. It is possible that  
21 the analyst would cycle back to this phase based on the evaluation process performed  
22 in Phase 3. Net salvage analysis consists of compiling historical salvage and removal

1 data by group to determine values and trends in gross salvage and removal cost. This  
2 information was then carried forward into Phase 3 for the evaluation process.  
3 Phase 3 is the evaluation process which synthesizes analysis, interviews, and  
4 operational characteristics into a final selection of asset lives and net salvage  
5 parameters. The historical analysis from Phase 2 is further enhanced by the  
6 incorporation of recent or future changes in the characteristics or operations of assets  
7 that were revealed in Phase 1. Phases 2 and 3 allow the depreciation analyst to  
8 validate the asset characteristics as seen in the accounting transactions with actual  
9 NYPA operational experience.  
10 Finally, Phase 4 involved the calculation of accrual rates, making recommendations,  
11 and documenting the conclusions in a final report.

#### 12 13 **IV. 2016 DEPRECIATION RATE STUDY FOR NYPA**

14 **Q. DID NYPA PROVIDE YOU WITH THE APPROPRIATE PLANT**  
15 **ACCOUNTING DATA FOR YOU TO CONDUCT THE DEPRECIATION**  
16 **STUDY?**

17 **A.** Yes. NYPA maintains its plant accounting records according to the Uniform System  
18 of Accounts. For many years, NYPA has maintained vintage plant accounting  
19 records by plant account for plant in service. They also have maintained depreciation  
20 reserves at the account and subaccount level with gross salvage and cost of removal  
21 history.



1 **Q. WHAT ANALYSES DID YOU CONDUCT WITH NYPA'S PLANT**  
2 **ACCOUNTING DATA?**

3 **A.** As part of the Depreciation Study, I conducted a statistical life study, a net salvage  
4 analysis, and an analysis of recorded depreciation reserves for all NYPA's plant and  
5 equipment.

6  
7 **Q. PLEASE DESCRIBE THE BASIS OF YOUR DEPRECIATION ESTIMATES**  
8 **IN THIS STUDY.**

9 **A.** The straight-line, broad (average) life group, remaining-life depreciation system was  
10 employed to calculate annual and accrued depreciation in this study. In this system,  
11 the annual depreciation expense for each group is computed by dividing the original  
12 cost of the asset less accumulated depreciation reserve less estimated net salvage by  
13 its respective average life group remaining life. The resulting annual accrual amounts  
14 of all depreciable property within an account by location were accumulated, and the  
15 total was divided by the original cost of all depreciable property within each account  
16 and location to determine the depreciation rate. The calculated remaining lives and  
17 annual depreciation accrual rates were based on attained ages of plant in service and  
18 the estimated service life and salvage characteristics of each depreciable group. The  
19 computations of the annual account level depreciation rates are shown in Exhibit No.  
20 NYP-003, Appendix A, pages 1-3.

21

22 **Q. DID YOU FOLLOW THE CALCULATION PROCESS PREVIOUSLY USED**  
23 **FOR NYPA?**

24 **A.** Yes. In this study, the calculation for transmission line assets is the same as used in  
25 previous NYPA studies, although slightly different than the normal transmission

1 remaining life calculation. NYPA has used a life-span calculation for individual  
2 transmission lines in the past. The life of each line was tied to the generation asset  
3 that it was serving. In this study, it became clear that there may be continued use of a  
4 transmission line after the generation that it is tied to is retired. Therefore, based on  
5 feedback from NYPA experts and NYPA experience, an 80-year life-span was set for  
6 each transmission line. The assumption (and experience) was that by the 80-year  
7 point, the transmission line would be completely rebuilt. This is happening currently  
8 for two lines (St. Lawrence MA1 and MA2). A more detailed explanation of the life-  
9 span calculation can be found in Exhibit No. NYP-003.

10  
11 **Q. PLEASE DESCRIBE THE LIFE-SPAN CALCULATION PROCESS YOU**  
12 **USED FOR TRANSMISSION LINE ASSETS.**

13 A. The life span procedure was used for transmission line facilities for which most  
14 components are expected to have a retirement date concurrent with the expected life  
15 cycle of the entire transmission line. The terminal retirement date refers to the year  
16 that each transmission line will cease operations or be replaced. The terminal  
17 retirement date along with the interim retirement characteristics of the assets (where  
18 applicable) that will retire prior to the facility ceasing operation are used to describe  
19 the pattern of retirement of the assets that comprise a unit. The estimated terminal  
20 retirement dates for the various transmission lines were determined based on  
21 consultation with NYPA management, financial, and engineering staff. Those  
22 estimated terminal retirement dates are shown in Exhibit No. NYP-003, Appendix C,  
23 page 2 of 2. These terminal retirement dates will be applied to Accounts 354-356:

1 Transmission Towers and Fixtures, Transmission Poles and Fixtures, and  
2 Transmission Overhead Conductors and Devices.

3

4 **Q. DID YOU APPLY THE LIFE-SPAN APPROACH TO ALL TRANSMISSION**  
5 **AND GENERAL PLANT ASSET GROUPS?**

6 A. No, just to Account 354 through Account 356 as previously applied to develop  
7 NYPA's currently existing depreciation rates. All other Transmission accounts (352  
8 Structures & Improvements, 353 Station Equipment, 357 Underground Conduit, and  
9 358 Underground Conductors and Devices) and certain General Plant accounts (390  
10 General Plant Structures & Improvements, 392 Transportation Equipment, 393 Stores  
11 Equipment, 394 Tools, Shop and Garage Equipment, 395 Laboratory Equipment, 396  
12 Power Operated Equipment, and 398 Miscellaneous Equipment) used average service  
13 lives to determine the remaining life for the depreciation rate calculations as  
14 described in Exhibit No. NYP-003.

15

16 **Q. IS THERE A DIFFERENT METHODOLOGY USED IN THE STUDY TO**  
17 **ACCOUNT FOR THE REMAINING LIFE FOR CERTAIN GENERAL**  
18 **PLANT ACCOUNTS?**

19 A. Yes. For NYPA, I recommend Vintage Group Accounting for General Plant  
20 Accounts 391 (all subaccounts – Office Furniture and Equipment and Computer  
21 Equipment), 397 Communication Equipment, and 399 Other Tangible Property.  
22 Vintage Group Accounting is described in FERC Accounting Release 15 ("AR 15"),  
23 commonly referred to as General Plant Amortization, Vintage Year Accounting For  
24 General Plant Accounts, dated January 1, 1997. AR 15 allowed utilities to use a  
25 simplified method of accounting for General Plant assets, excluding structures and

1 improvements. The AR 15 release allowed high-volume, low-cost assets to be  
2 amortized over the associated useful life, eliminated the need to track individual  
3 assets, and allows a retirement to be booked at the end of the depreciable life. This  
4 method is often referred to as “amortization of General Plant.” One of the  
5 components of the implementation of AR 15 is the need to have an accrued  
6 depreciation reserve at the level necessary to fully recover (not over or under recover)  
7 the assets’ cost over the remaining life of the asset groups under the General Plant  
8 amortization. To do this, it is necessary to calculate the difference between the  
9 theoretical and actual depreciation reserves and recover (or return) the net difference  
10 over a period of time. This Depreciation Study uses the remaining life of the asset  
11 group to recover the differential cost, mimicking the remaining life methodology used  
12 for other assets in the Depreciation Study. This approach is the standard  
13 implementation method used in the industry.

14  
15 **Q. HOW DID YOU ADDRESS REMOVAL COST IN THE STUDY?**

16 A. NYPA does not charge removal cost for replacement activity as a normal practice for  
17 transmission lines. Removal cost is charged by NYPA with the total replacement of a  
18 transmission line. The removal cost for the current transmission replacement project  
19 (St. Lawrence MA1 and MA2) was calculated and that information was used as a  
20 proxy for the terminal removal cost for the replacement of NYPA’s transmission  
21 lines. Appendix D-1 of Exhibit No. NYP-003 shows the calculation of the removal  
22 cost based on the current transmission line replacement project. The removal cost  
23 percentages for transmission line structures and conductor (Account 354 – Towers

1 and Fixtures, Account 355 – Poles and Fixtures, and Account 356 – Overhead  
 2 Conductors and Devices) were capped at negative 100 percent for this study. Even  
 3 though NYPA believes the St. Lawrence MA1/MA2 transmission project is  
 4 representative of future replacement projects, recognition is given to the fact that  
 5 NYPA only has one project on which to base its removal cost estimate. The  
 6 transmission line asset removal cost estimate recommended in Alliance's  
 7 Depreciation Study is an extremely conservative recommendation as compared to the  
 8 actual net salvage based on the project estimate. The actual net salvage calculated  
 9 from the projected retirement of the two lines is negative 768 percent compared to the  
 10 recommended negative 100 percent net salvage. Station structures and substations  
 11 (Accounts 352 - Structures and Improvements and Account 353 – Station Equipment)  
 12 were set to the estimated negative three percent net salvage found in the St. Lawrence  
 13 MA1/MA2 project removal cost calculation. Using judgment, the net salvage for  
 14 Account 357 – Underground Conduit was set at the negative five percent currently  
 15 being used for underground conduit, and the net salvage for Account 358 –  
 16 Underground Conductors and Devices was increased from a negative fifteen percent  
 17 net salvage to the proposed negative five percent net salvage. Exhibit No. NYP-003,  
 18 Appendix C provides a comparison of existing and proposed net salvage percentages  
 19 for each account.

21 **Q. ARE YOU RECOMMENDING A REBALANCING OF DEPRECIATION**  
 22 **RESERVES FOR NYPA?**

23 **A.** No. The calculation of depreciation rates uses the book reserve for each account or  
 24 subaccount as recorded on the books of NYPA.

1 **Q. PLEASE DESCRIBE THE DEPRECIATION SYSTEM USED TO DERIVE**  
2 **NYPA'S DEPRECIATION RATES?**

3 **A.** Annual depreciation expense amounts for the depreciable accounts of NYPA were  
4 calculated by the straight-line method, average life group (broad group or life-span)  
5 procedure, and remaining-life technique. With this approach, remaining lives were  
6 calculated according to standard ALG expectancy techniques, using the Iowa  
7 Survivor Curves noted in the calculation. For each plant account, the difference  
8 between the original cost at 12/31/15, adjusted for estimated net salvage, and the  
9 accumulated book depreciation reserve, was divided by the average remaining life to  
10 yield the annual depreciation expense.

11

12 **Q. PLEASE SUMMARIZE THE DEPRECIATION RATES AND ACCRUALS**  
13 **RECOMMENDED FOR NYPA.**

14 **A.** This study recommends a set of new depreciation rates that will produce an overall  
15 decrease in annual depreciation expense for transmission and general plant compared  
16 to rates currently in effect. The recommended change in depreciation rates would  
17 produce an overall decrease of \$4.6 million in annual depreciation expense for all  
18 accounts compared to rates currently in effect (based on December 31, 2015 plant  
19 balances), if the proposed rates were used to develop calendar year 2015 depreciation  
20 accruals. This overall decrease consists of a decrease of \$833 thousand in  
21 depreciation expense for transmission accounts and a decrease of \$3.8 million for  
22 general plant accounts, as shown in Exhibit No. NYP-003, Appendix B. The  
23 following table shows the depreciation rates and accruals recommended for NYPA's  
24 existing assets. The accruals are annualized based on investment at December 31,

1 2015. The detailed analysis and recommended lives and net salvage are found in  
 2 Exhibit No. NYP-003.

3 **Table 1 – Recommended Depreciation Rates (Existing Assets)**

<b>Account</b>	<b>Account Description</b>	<b>Plant Balance at 12/31/2015 \$</b>	<b>Proposed Accrual Rate %</b>	<b>Proposed Accrual Amount \$</b>
<b>TRANSMISSION</b>				
<b><u>Blenheim Gilboa</u></b>				
352	Structures & Improvements	4,317,717	0.65%	27,938
353	Station Equipment	51,222,730	1.57%	803,987
354	Towers & Fixtures	22,612,274	2.49%	562,919
355	Poles & Fixtures	1,953,118	2.07%	40,493
356	Overhead Conductors & Devices	9,403,929	2.46%	231,636
359	Roads & Trails	670,808	0.64%	4,296
	Total Blenheim Gilboa	90,180,576		1,671,269
<b><u>J. A. FitzPatrick *</u></b>				
354	Towers & Fixtures	10,051,183	1.95%	195,615
356	Overhead Conductors & Devices	5,926,677	2.23%	132,302
359	Roads & Trails	80,335	0.13%	108
	Total J. A. Fitzpatrick	16,058,195		328,025
<b><u>Marcy South</u></b>				
353	Station Equipment	23,088,723	1.29%	298,768
354	Towers & Fixtures	75,439,776	2.71%	2,040,834
355	Poles & Fixtures	210,096,383	2.43%	5,115,401
356	Overhead Conductors & Devices	105,799,660	2.69%	2,845,218
357	Underground Conduit	43,951,419	1.23%	542,354
358	Underground Conductors & Devices	12,314,493	1.86%	229,581
359	Roads & Trails	22,421,909	0.90%	202,137
	Total Marcy South	493,112,363		11,274,292
<b><u>Marcy Massena</u></b>				
352	Structures & Improvements	40,268,127	0.92%	370,188
353	Station Equipment	191,779,559	1.21%	2,323,860
354	Towers & Fixtures	64,465,654	2.66%	1,716,446
355	Poles & Fixtures	19,615,058	2.22%	435,641
356	Overhead Conductors & Devices	42,480,940	3.24%	1,374,802

\* No 2015 accrual - assets in J.A. FitzPatrick were fully accrued in last depreciation study

**Ex. No. NYP-001**

359	Roads & Trails	5,105,433	0.73%	37,255
	Total Marcy Massena	363,714,771		6,258,193

**Niagara**

352	Structures & Improvements	24,449,344	0.73%	178,618
353	Station Equipment	93,379,948	1.32%	1,236,826
354	Towers & Fixtures	18,743,984	3.32%	621,770
355	Poles & Fixtures	19,726	3.25%	641
356	Overhead Conductors & Devices	28,672,314	3.77%	1,079,756
359	Roads & Trails	42,797	0.28%	122
	Total Niagara	165,308,113		3,117,733

**St. Lawrence**

352	Structures & Improvements	12,343,417	0.96%	119,106
353	Station Equipment	137,716,425	1.27%	1,752,454
354	Towers & Fixtures	15,185,237	4.63%	702,672
355	Poles & Fixtures	6,427,665	3.65%	234,325
356	Overhead Conductors & Devices	15,472,585	4.54%	702,921
357	Underground Conduit	61,047	0.18%	110
358	Underground Conductors & Devices	1,186,661	0.41%	4,917
359	Roads & Trails	193,299	0.55%	1,070
	Total St. Lawrence	188,586,336		3,517,576

Total Transmission	1,316,960,353	26,167,088
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**GENERAL PLANT****Blenheim Gilboa**

390	Structures and Improvements	30,224,468	1.85%	559,464
392	Transportation Equipment	5,338,747	9.23%	492,846
393	Stores Equipment	379,493	3.21%	12,185
394	Tools, Shop, and Garage Equipment	1,809,969	3.67%	66,422
395	Laboratory Equipment	819,371	2.30%	18,850
396	Power Operated Equipment	2,497,644	7.23%	180,512
398	Miscellaneous Equipment	1,896,665	3.67%	69,617

**Headquarters**

390	Structures and Improvements	74,177,492	1.53%	1,136,559
392	Transportation Equipment	11,806,296	6.48%	765,188
394	Tools, Shop, and Garage Equipment	766,953	2.88%	22,104
395	Laboratory Equipment	2,961,576	4.82%	142,839



**Ex. No. NYP-001**

398	Miscellaneous Equipment Note (2)	22,316,280	0.002%	396
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**Marcy South**

396	Power Operated Equipment	763	Note (1)	0
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**Massena Marcy**

390	Structures and Improvements	2,602,692	1.62%	42,168
392	Transportation Equipment	6,522,896	8.65%	564,204
393	Stores Equipment	129,292	3.33%	4,306
394	Tools, Shop, and Garage Equipment	742,377	1.20%	8,888
395	Laboratory Equipment	959,056	1.52%	14,605
396	Power Operated Equipment	3,739,914	4.81%	179,718
398	Miscellaneous Equipment	991,162	0.02%	212

**Niagara**

390	Structures and Improvements	29,145,371	1.34%	390,987
392	Transportation Equipment	8,453,942	7.12%	601,871
393	Stores Equipment	315,500	Note (1)	
394	Tools, Shop, and Garage Equipment	5,171,828	4.14%	214,178
395	Laboratory Equipment	1,722,115	1.57%	27,089
396	Power Operated Equipment	4,288,696	6.51%	279,335
398	Miscellaneous Equipment	7,415,152	0.86%	63,800

**St. Lawrence**

390	Structures and Improvements	20,710,197	1.82%	376,935
392	Transportation Equipment	12,984,613	9.83%	1,276,434
393	Stores Equipment	317,287	2.65%	8,417
394	Tools, Shop, and Garage Equipment	6,073,189	6.45%	391,682
395	Laboratory Equipment	2,119,586	5.48%	116,119
396	Power Operated Equipment	5,159,241	5.47%	282,161
398	Miscellaneous Equipment	16,718,022	11.04%	1,845,607

Note 1: Fully accrued. If plant is added to Marcy South Account 396, the recommended accrual rate is 8.33%

If plant is added to Niagara Account 393, the recommended accrual rate is 3.33%

Note 2: Nearly Fully accrued. If new plant is added to 398 Headquarters, the recommended Accrual rate is 5.00%

**Amortized Accounts after Retirement of Fully Accrued Assets****Blenheim Gilboa**

391	Office Furniture and Equipment	38,398	10.00%	3,840
391	Computer Equipment 5 yr	130,982	20.00%	26,196

**Ex. No. NYP-001**

391	Computer Equip 10 Yr	236,190	10.00%	23,619
397	Communication Equipment	7,003	6.67%	467
399	Other Tangible Property	0	6.67%	0

**Headquarters**

391	Office Furniture and Equipment	10,417,362	10.00%	1,041,736
391	Computer Equipment 5 yr	15,698,134	20.00%	3,139,627
391	Computer Equip 10 Yr	50,072,107	10.00%	5,007,211
397	Communication Equipment	553,697	6.67%	36,913

**Marcy South**

397	Marcy South	0	6.67%	0
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**Massena  
Marcy**

391	Office Furniture and Equipment	41,182	10.00%	4,118
391	Computer Equipment 5 yr	356,802	20.00%	71,360
391	Computer Equip 10 Yr	2,213,258	10.00%	221,326
397	Communication Equipment	113,375	6.67%	7,558

**Niagara**

391	Office Furniture and Equipment	14,895	10.00%	1,489
391	Computer Equipment 5 yr	204,980	20.00%	40,996
391	Computer Equip 10 Yr	0	10.00%	0
397	Communication Equipment	1,144,762	6.67%	76,317
399	Other Tangible Property	3,201,209	6.67%	213,414

**St. Lawrence**

391	Office Furniture and Equipment	24,050	10.00%	2,405
391	Computer Equipment 5 yr	235,825	20.00%	47,165
391	Computer Equip 10 Yr	7,081,808	10.00%	708,181
397	Communication Equipment	5,457,758	6.67%	363,851
399	Other Tangible Property	1,126,419	6.67%	75,095

Accrual for Reserve Imbalance				(631,766)
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Total General	389,648,042			20,636,816
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Total NYPA	1,706,608,395			46,803,904
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1

2

**Q. SINCE THE RECOMMENDED DEPRECIATION RATES ARE SPECIFIC TO INDIVIDUAL PROJECTS/LOCATIONS, ARE YOU RECOMMENDING “GENERIC” DEPRECIATION RATES FOR ANY NEW PROJECT OR LOCATION THAT IS CURRENTLY NOT COVERED IN THE EXISTING DEPRECIATION RATES?**

**A.** Yes. Below are depreciation rates that should be used in the event of capital additions that are not covered by the current project or location depreciation rates. These rates are based on the life and net salvage parameters recommended for NYPA’s assets shown on Exhibit No. NYP-003, Appendix C page 1 of 2 (columns under the “Proposed” heading). These rates were calculated by dividing (1-Net Salvage Percentage) by the life of the account. In other words, the generic depreciation rate for Account 352 Structures & Improvements is  $(1-(-0.03))/75 = 1.37\%$ .

**Table 2 – Recommended Depreciation Rates for New Projects/Locations**

Acct	Description	Life	Curve	Net Salvage	Whole Life Accrual Rate
<b>Depreciated Accounts</b>					
352	Structures & Improvements	75	R5	-3%	1.37%
353	Station Equipment	60	R5	-3%	1.72%
354	Towers & Fixtures	80	SQ	-100%	2.50%
355	Poles & Fixtures	80	SQ	-100%	2.50%
356	Overhead Conductors & Devices	80	SQ	-100%	2.50%
357	Underground Conduit	75	R5	-5%	1.40%
358	Underground Conductors & Devices	50	R5	-5%	2.10%
359	Roads & Trails	100	SQ	0%	1.00%
390	Structures and Improvements	50	R3	0%	2.00%
392	Transportation Equipment	7	L2	0%	14.29%
393	Stores Equipment	30	SQ	0%	3.33%
394	Tools, Shop, and Garage Equipment	20	SQ	0%	5.00%
395	Laboratory Equipment	20	SQ	0%	5.00%

396	Power Operated Equipment	12	S2.5	0%	8.33%
398	Miscellaneous Equipment	20	SQ	0%	5.00%

**Amortized Accounts**

391	Office Furniture and Equipment	10	SQ	0%	10.00%
391.2	Computer Equipment	5	SQ	0%	20.00%
391.3	Computer Equipment 10 Year	10	SQ	0%	10.00%
397	Communication Equipment	15	SQ	0%	6.67%
399	Other Tangible Property	15	SQ	0%	6.67%

1

2 **Q. SHOULD THE ABOVE NEW PROJECT/LOCATION DEPRECIATION**  
3 **RATES BE USED IN ANY OTHER INSTANCE?**

4

5 **A.** Yes. There are some existing projects where there was no depreciable plant (or all  
6 plant was fully depreciated) in certain accounts at the Depreciation Study date of  
7 12/31/15. Therefore, the Depreciation Study did not recommend project-specific  
8 depreciation rates for those project accounts. However, if new plant corresponding to  
9 these accounts (where no depreciation rate is listed) is subsequently added for the  
10 relevant projects, it is reasonable to apply the “New Project” depreciation rates, and  
11 the “New Project” depreciation rate for the relevant account should be used.

12

13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

14 **A.** Yes, it does.

15

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Texas	Railroad Commission of Texas	GUD 10567	CenterPoint Texas	2016	Gas Depreciation Study
MultiState	FERC	ER17-191-000	American Transmission Company	2016	Electric Depreciation Study
New Jersey	New Jersey Public Utilities Board	GR16090826	Elizabethtown Natural Gas	2016	Gas Depreciation Study
North Carolina	North Carolina Utilities Commission	Docket G-9 Sub 77H	Piedmont Natural Gas	2016	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-18195	Consumers Energy/DTE Electric	2016	Ludington Pumped Storage Depreciation Study
Alabama	FERC	ER16-2313-000	SESCO	2016	Electric Depreciation Study
Alabama	FERC	ER16-2312-000	Alabama Power Company	2016	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-18127	Consumers Energy	2016	Natural Gas Depreciation Study
Mississippi	Mississippi Public Service Commission	2016 UN 267	Willmut Natural Gas	2016	Natural Gas Depreciation Study
Iowa	Iowa Utilities Board	RPU-2016-0003	Liberty-Iowa	2016	Natural Gas Depreciation Study
Illinois	Illinois Commerce Commission	GRM #16-208	Liberty-Illinois	2016	Natural Gas Depreciation Study
Kentucky	FERC	RP16-097-000	KOT	2016	Natural Gas Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Alaska	Regulatory Commission of Alaska	U-16-067	Alaska Electric Light and Power	2016	Generating Unit Depreciation Study
Florida	Florida Public Service Commission	160170-EI	Gulf Power	2016	Electric Depreciation Study
California	California Public Utilities Commission	A 16-07-002	California American Water	2016	Water and Waste Water Depreciation Study
Arizona	Arizona Corporation Commission	G-01551A-16-0107	Southwest Gas	2016	Gas Depreciation Study
Texas	Public Utility Commission of Texas	45414	Sharyland	2016	Electric Depreciation Study
Colorado	Colorado Public Utilities Commission	16A-0231E	Public Service of Colorado	2016	Electric Depreciation Study
Multi-State NE US	FERC	16-453-000	Northeast Transmission Development, LLC	2015	Electric Depreciation Study
Arkansas	Arkansas Public Service Commission	15-098-U	CenterPoint Arkansas	2015	Gas Depreciation Study and Cost of Removal Study
New Mexico	New Mexico Public Regulation Commission	15-00296-UT	SPS NM	2015	Electric Depreciation Study
Atmos Energy Corporation	Tennessee Regulatory Authority	14-00146	Atmos Tennessee	2015	Natural Gas Depreciation Study
New Mexico	New Mexico Public Regulation Commission	15-00261-UT	Public Service Company of New Mexico	2015	Electric Depreciation Study
Hawaii	NA	NA	Hawaii American Water	2015	Water/Wastewater Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Kansas	Kansas Corporation Commission	16-ATMG-079-RTS	Atmos Kansas	2015	Gas Depreciation Study
Texas	Public Utility Commission of Texas	44704	Entergy Texas	2015	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-15-089	Fairbanks Water and Wastewater	2015	Water and Waste Water Depreciation Study
Arkansas	Arkansas Public Service Commission	15-031-U	Source Gas Arkansas	2015	Underground Storage Gas Depreciation Study
New Mexico	New Mexico Public Regulation Commission	15-00139-UT	SPS NM	2015	Electric Depreciation Study
Texas	Public Utility Commission of Texas	44746	Wind Energy Transmission Texas	2015	Electric Depreciation Study
Colorado	Colorado Public Utilities Commission	15-AL-0299G	Atmos Colorado	2015	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	15-011-U	Source Gas Arkansas	2015	Gas Depreciation Study
Texas	Railroad Commission of Texas	GUD 10432	CenterPoint-Texas Coast Division	2015	Gas Depreciation Study
Kansas	Kansas Corporation Commission	15-KCPE-116-RTS	Kansas City Power and Light	2015	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-120	Alaska Electric Light and Power	2014-2015	Electric Depreciation Study
Texas	Public Utility Commission of Texas	43950	Cross Texas Transmission	2014	Electric Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
New Mexico	New Mexico Public Regulation Commission	14-00332-UT	Public Service of New Mexico	2014	Electric Depreciation Study
Texas	Public Utility Commission of Texas	43695	Xcel Energy	2014	Electric Depreciation Study
Multi State – SE US	FERC	RP15-101	Florida Gas Transmission	2014	Gas Transmission Depreciation Study
California	California Public Utilities Commission	A.14-07-006	Golden State Water	2014	Water and Waste Water Depreciation Study
Michigan	Michigan Public Service Commission	U-17653	Consumers Energy Company	2014	Electric and Common Depreciation Study
Colorado	Public Utilities Commission of Colorado	14AL-0660E	Public Service of Colorado	2014	Electric Depreciation Study
Wisconsin	Wisconsin	05-DU-102	WE Energies	2014	Electric, Gas, Steam and Common Depreciation Studies
Texas	Public Utility Commission of Texas	42469	Lone Star Transmission	2014	Electric Depreciation Study
Nebraska	Nebraska Public Service Commission	NG-0079	Source Gas Nebraska	2014	Gas Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-055	TDX North Slope Generating	2014	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-054	Sand Point Generating LLC	2014	Electric Depreciation Study



REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Alaska	Regulatory Commission of Alaska	U-14-045	Matanuska Electric Coop	2014	Electric Generation Depreciation Study
Texas, New Mexico	Public Utility Commission of Texas	42004	Xcel Energy	2013-2014	Electric Production, Transmission, Distribution and General Plant Depreciation Study
New Jersey	Board of Public Utilities	GR13111137	South Jersey Gas	2013	Gas Depreciation Study
Various	FERC	RP14-247-000	Sea Robin	2013	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	13-078-U	Arkansas Oklahoma Gas	2013	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	13-079-U	Source Gas Arkansas	2013	Gas Depreciation Study
California	California Public Utilities Commission	Proceeding No.: A.13-11-003	Southern California Edison	2013	Electric Depreciation Study
North Carolina/South Carolina	FERC	ER13-1313	Progress Energy Carolina	2013	Electric Depreciation Study
Wisconsin	Public Service Commission of Wisconsin	4220-DU-108	Northern States Power- Wisconsin	2013	Electric, Gas and Common Transmission, Distribution and General
Texas	Public Utility Commission of Texas	41474	Sharyland	2013	Electric Depreciation Study
Kentucky	Kentucky Public Service Commission	2013-00148	Atmos Energy Corporation	2013	Gas Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Minnesota	Minnesota Public Utilities Commission	13-252	Allete Minnesota Power	2013	Electric Depreciation Study
New Hampshire	New Hampshire Public Service Commission	DE 13-063	Liberty Utilities	2013	Electric Distribution and General
Texas	Railroad Commission of Texas	10235	West Texas Gas	2013	Gas Depreciation Study
Alaska	Regulatory Commission of Alaska	U-12-154	Alaska Telephone Company	2012	Telecommunications Utility
New Mexico	New Mexico Public Regulation Commission	12-00350-UT	SPS	2012	Electric Depreciation Study
Colorado	Colorado Public Utilities Commission	12AL-1269ST	Public Service of Colorado	2012	Gas and Steam Depreciation Study
Colorado	Colorado Public Utilities Commission	12AL-1268G	Public Service of Colorado	2012	Gas and Steam Depreciation Study
Alaska	Regulatory Commission of Alaska	U-12-149	Municipal Power and Light City of Anchorage	2012	Electric Depreciation Study
Texas	Texas Public Utility Commission	40824	Xcel Energy	2012	Electric Depreciation Study
South Carolina	Public Service Commission of South Carolina	Docket 2012-384-E	Progress Energy Carolina	2012	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-12-141	Interior Telephone Company	2012	Telecommunications Utility
Michigan	Michigan Public Service Commission	U-17104	Michigan Gas Utilities Corporation	2012	Gas Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
North Carolina	North Carolina Utilities Commission	E-2 Sub 1025	Progress Energy Carolina	2012	Electric Depreciation Study
Texas	Texas Public Utility Commission	40606	Wind Energy Transmission Texas	2012	Electric Depreciation Study
Texas	Texas Public Utility Commission	40604	Cross Texas Transmission	2012	Electric Depreciation Study
Minnesota	Minnesota Public Utilities Commission	12-858	Minnesota Northern States Power	2012	Electric, Gas and Common Transmission, Distribution and General
Texas	Railroad Commission of Texas	10170	Atmos Mid-Tex	2012	Gas Depreciation Study
Texas	Railroad Commission of Texas	10174	Atmos West Texas	2012	Gas Depreciation Study
Texas	Railroad Commission of Texas	10182	CenterPoint Beaumont/ East Texas	2012	Gas Depreciation Study
Kansas	Kansas Corporation Commission	12-KCPE-764-RTS	Kansas City Power and Light	2012	Electric Depreciation Study
Nevada	Public Utility Commission of Nevada	12-04005	Southwest Gas	2012	Gas Depreciation Study
Texas	Railroad Commission of Texas	10147, 10170	Atmos Mid-Tex	2012	Gas Depreciation Study
Kansas	Kansas Corporation Commission	12-ATMG-564-RTS	Atmos Kansas	2012	Gas Depreciation Study
Texas	Texas Public Utility Commission	40020	Lone Star Transmission	2012	Electric Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Michigan	Michigan Public Service Commission	U-16938	Consumers Energy Company	2011	Gas Depreciation Study
Colorado	Public Utilities Commission of Colorado	11AL-947E	Public Service of Colorado	2011	Electric Depreciation Study
Texas	Texas Public Utility Commission	39896	Entergy Texas	2011	Electric Depreciation Study
MultiState	FERC	ER12-212	American Transmission Company	2011	Electric Depreciation Study
California	California Public Utilities Commission	A1011015	Southern California Edison	2011	Electric Depreciation Study
Mississippi	Mississippi Public Service Commission	2011-UN-184	Atmos Energy	2011	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-16536	Consumers Energy Company	2011	Wind Depreciation Rate Study
Texas	Public Utility Commission of Texas	38929	Oncor	2011	Electric Depreciation Study
Texas	Railroad Commission of Texas	10038	CenterPoint South TX	2010	Gas Depreciation Study
Alaska	Regulatory Commission of Alaska	U-10-070	Inside Passage Electric Cooperative	2010	Electric Depreciation Study
Texas	Public Utility Commission of Texas	36633	City Public Service of San Antonio	2010	Electric Depreciation Study
Texas	Texas Railroad Commission	10000	Atmos Pipeline Texas	2010	Gas Depreciation Study
Multi State – SE US	FERC	RP10-21-000	Florida Gas Transmission	2010	Gas Depreciation Study
Maine/ New Hampshire	FERC	10-896	Granite State Gas Transmission	2010	Gas Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Texas	Public Utility Commission of Texas	38480	Texas New Mexico Power	2010	Electric Depreciation Study
Texas	Public Utility Commission of Texas	38339	CenterPoint Electric	2010	Electric Depreciation Study
Texas	Texas Railroad Commission	10041	Atmos Amarillo	2010	Gas Depreciation Study
Georgia	Georgia Public Service Commission	31647	Atlanta Gas Light	2010	Gas Depreciation Study
Texas	Public Utility Commission of Texas	38147	Southwestern Public Service	2010	Electric Technical Update
Alaska	Regulatory Commission of Alaska	U-09-015	Alaska Electric Light and Power	2009-2010	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-10-043	Utility Services of Alaska	2009-2010	Water Depreciation Study
Michigan	Michigan Public Service Commission	U-16055	Consumers Energy/DTE Energy	2009-2010	Ludington Pumped Storage Depreciation Study
Michigan	Michigan Public Service Commission	U-16054	Consumers Energy	2009-2010	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-15963	Michigan Gas Utilities Corporation	2009	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-15989	Upper Peninsula Power Company	2009	Electric Depreciation Study
Texas	Railroad Commission of Texas	9869	Atmos Energy	2009	Shared Services Depreciation Study
Mississippi	Mississippi Public Service Commission	09-UN-334	CenterPoint Energy Mississippi	2009	Gas Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Texas	Railroad Commission of Texas	9902	CenterPoint Energy Houston	2009	Gas Depreciation Study
Colorado	Colorado Public Utilities Commission	09AL-299E	Public Service of Colorado	2009	Electric Depreciation Study
Tennessee	Tennessee Regulatory Authority	11-00144	Piedmont Natural Gas	2009	Gas Depreciation Study
Louisiana	Louisiana Public Service Commission	U-30689	Cleco	2008	Electric Depreciation Study
Texas	Public Utility Commission of Texas	35763	SPS	2008	Electric Production, Transmission, Distribution and General Plant Depreciation Study
Wisconsin	Wisconsin	05-DU-101	WE Energies	2008	Electric, Gas, Steam and Common Depreciation Studies
North Dakota	North Dakota Public Service Commission	PU-07-776	Northern States Power	2008	Net Salvage
New Mexico	New Mexico Public Regulation Commission	07-00319-UT	SPS	2008	Testimony – Depreciation
Multiple States	Railroad Commission of Texas	9762	Atmos Energy	2007-2008	Shared Services Depreciation Study
Minnesota	Minnesota Public Utilities Commission	E015/D-08-422	Minnesota Power	2007-2008	Electric Depreciation Study
Texas	Public Utility Commission of Texas	35717	Oncor	2008	Electric Depreciation Study

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Texas	Public Utility Commission of Texas	34040	Oncor	2007	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-15629	Consumers Energy	2006-2009	Gas Depreciation Study
Colorado	Colorado Public Utilities Commission	06-234-EG	Public Service of Colorado	2006	Electric Depreciation Study
Arkansas	Arkansas Public Service Commission	06-161-U	CenterPoint Energy – Arkla Gas	2006	Gas Distribution Depreciation Study and Removal Cost Study
Texas, New Mexico	Public Utility Commission of Texas	32766	Xcel Energy	2005-2006	Electric Production, Transmission, Distribution and General Plant Depreciation Study
Texas	Railroad Commission of Texas	9670/9676	Atmos Energy Corp	2005-2006	Gas Distribution Depreciation Study
Texas	Railroad Commission of Texas	9400	TXU Gas	2003-2004	Gas Distribution Depreciation Study
Texas	Railroad Commission of Texas	9313	TXU Gas	2002	Gas Distribution Depreciation Study
Texas	Railroad Commission of Texas	9225	TXU Gas	2002	Gas Distribution Depreciation Study
Texas	Public Utility Commission of Texas	24060	TXU	2001	Line Losses
Texas	Public Utility Commission of Texas	23640	TXU	2001	Line Losses

REGULATORY PROCEEDING APPEARANCES OF DANE A. WATSON

<b>Asset Location</b>	<b>Commission</b>	<b>Docket (If Applicable)</b>	<b>Company</b>	<b>Year</b>	<b>Description</b>
Texas	Railroad Commission of Texas	9145-9148	TXU Gas	2000-2001	Gas Distribution Depreciation Study
Texas	Public Utility Commission of Texas	22350	TXU	2000-2001	Electric Depreciation Study, Unbundling
Texas	Railroad Commission of Texas	8976	TXU Pipeline	1999	Pipeline Depreciation Study
Texas	Public Utility Commission of Texas	20285	TXU	1999	Fuel Company Depreciation Study
Texas	Public Utility Commission of Texas	18490	TXU	1998	Transition to Competition
Texas	Public Utility Commission of Texas	16650	TXU	1997	Customer Complaint
Texas	Public Utility Commission of Texas	15195	TXU	1996	Mining Company Depreciation Study
Texas	Public Utility Commission of Texas	12160	TXU	1993	Fuel Company Depreciation Study
Texas	Public Utility Commission of Texas	11735	TXU	1993	Electric Depreciation Study



**NEW YORK POWER AUTHORITY**  
**ELECTRIC TRANSMISSION AND**  
**GENERAL UTILITY PLANT**  
**DEPRECIATION RATE STUDY**  
**AT DECEMBER 31, 2015**



<http://www.utilityalliance.com>

**NEW YORK POWER AUTHORITY  
ELECTRIC TRANSMISSION AND  
GENERAL PLANT  
DEPRECIATION RATE STUDY  
EXECUTIVE SUMMARY**

New York Power Authority (“NYPA” or “Company”) engaged Alliance Consulting Group to conduct a depreciation study of the Company’s Transmission and General utility plant depreciable assets as of December 31, 2015.

This study was conducted under a traditional depreciation study approach for life and net salvage. The broad group, average life, remaining life depreciation system was used. This methodology has been adopted by numerous state commissions and FERC.

NYPA’s last depreciation study was performed in 1996. This study recommends an overall decrease of \$4.6 million annual depreciation expense for all accounts compared to rates currently in effect. This consists of the following changes: a decrease of \$833 thousand in depreciation expense for transmission accounts and a decrease of \$3.8 million for general plant accounts. Appendix A shows the computation of the proposed depreciation rates. Appendix B demonstrates the change in depreciation expense for the various accounts.

**NEW YORK POWER AUTHORITY  
ELECTRIC TRANSMISSION AND GENERAL PLANT  
DEPRECIATION RATE STUDY  
AT DECEMBER 31, 2015**

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## **PURPOSE**

The purpose of this study is to develop depreciation rates for the depreciable transmission and general property as recorded on NYPA's books at December 31, 2015. The account based depreciation rates were designed to recover the total remaining undepreciated investment, adjusted for net salvage, over the remaining life of NYPA's property on a straight-line basis. Hydro production, other production, and non-depreciable property were excluded from this study. Also excluded were hydro relicensing costs that are booked in Account 398, Miscellaneous Equipment.

The New York Power Authority provides transmission service in various parts of New York State over more than 1,400 circuit-miles of transmission facilities, which account for one-third of the state's high-voltage lines. They operate and maintain our power lines with a strong commitment to safety and the environment and work closely with the New York Independent System Operator (NYISO), other transmission owners and the New York State Public Service Commission to help ensure a high level of power-system reliability. NYPA also has various other general plant assets utilized to serve its customers.

## **STUDY RESULTS**

Overall depreciation rates for all NYPA depreciable transmission and general property are shown in Appendix A. These rates translate into an annual depreciation accrual of \$46.8 million based on NYPA's depreciable investment at December 31, 2015. The annual equivalent depreciation expense calculated by the same method using the approved rates for surviving assets at December 31, 2015 was \$51.4 million. These proposed rates translate into an annual depreciation accrual Transmission Plant of \$26.2 million, and General Plant of \$20.6 million.

Appendix A demonstrates the development of the annual depreciation rates and accruals. Appendices A-1 and A-2 show the amortization rates for accounts that are recommended to adopt general plant amortization. Appendix B presents a comparison of approved rates versus proposed rates by account. Appendix C presents a summary of mortality and net salvage estimates by account. Appendix D presents the net salvage analysis for all accounts. The change in depreciation expense is recognizing the unique depreciation parameters associated with NYPA assets.

## GENERAL DISCUSSION

### **Definition**

The term "depreciation" as used in this study is considered in the accounting sense, that is, a system of accounting that distributes the cost of assets, less net salvage (if any), over the estimated useful life of the assets in a systematic and rational manner. It is a process of allocation, not valuation. This expense is systematically allocated to accounting periods over the life of the properties. The amount allocated to any one accounting period does not necessarily represent the loss or decrease in value that will occur during that particular period. The Company accrues depreciation on the basis of the original cost of all depreciable property included in each functional property group. On retirement the full cost of depreciable property, less the net salvage value, is charged to the depreciation reserve.

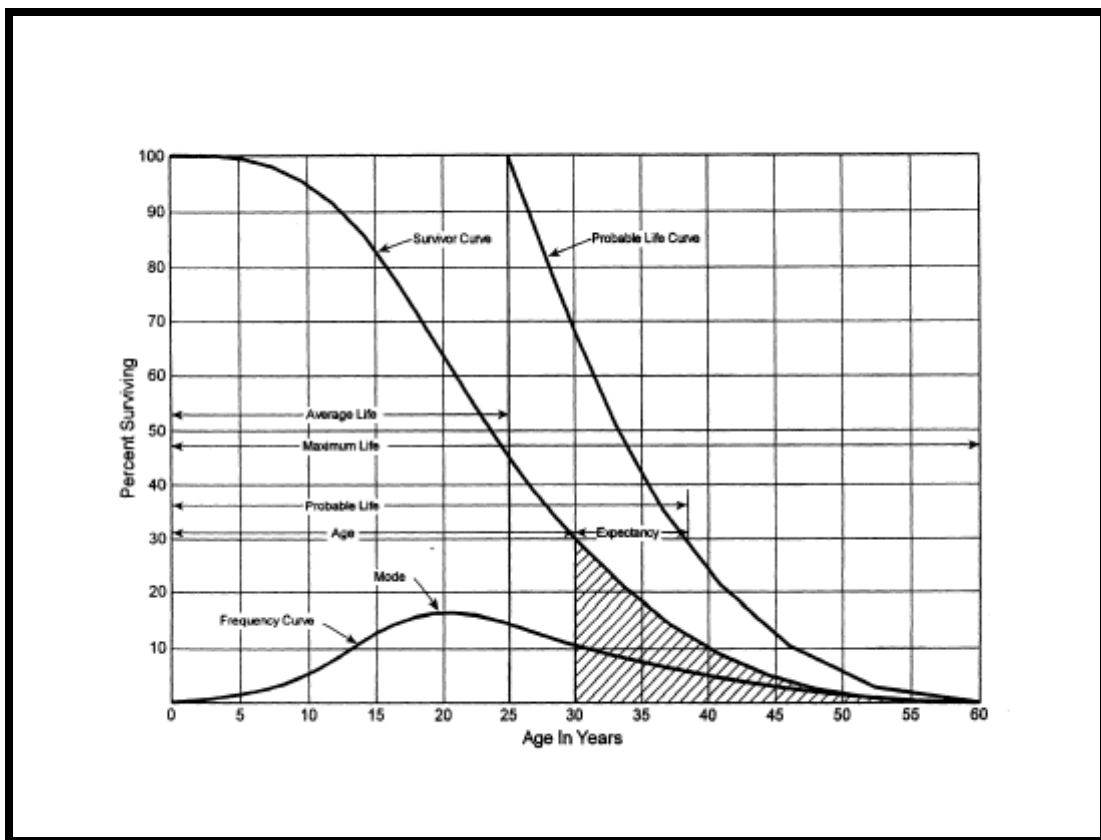
### **Basis of Depreciation Estimates**

The straight-line, broad (average) life group, remaining-life depreciation system was employed to calculate annual and accrued depreciation in this study. In this system, the annual depreciation expense for each group is computed by dividing the original cost of the asset less allocated depreciation reserve less estimated net salvage by its respective average life group remaining life. The resulting annual accrual amounts of all depreciable property within a function were accumulated, and the total was divided by the original cost of all functional depreciable property to determine the depreciation rate. The calculated remaining lives and annual depreciation accrual rates were based on attained ages of plant in service and the estimated service life and salvage characteristics of each depreciable group. The computations of the annual account level depreciation rates are shown in Appendix A.

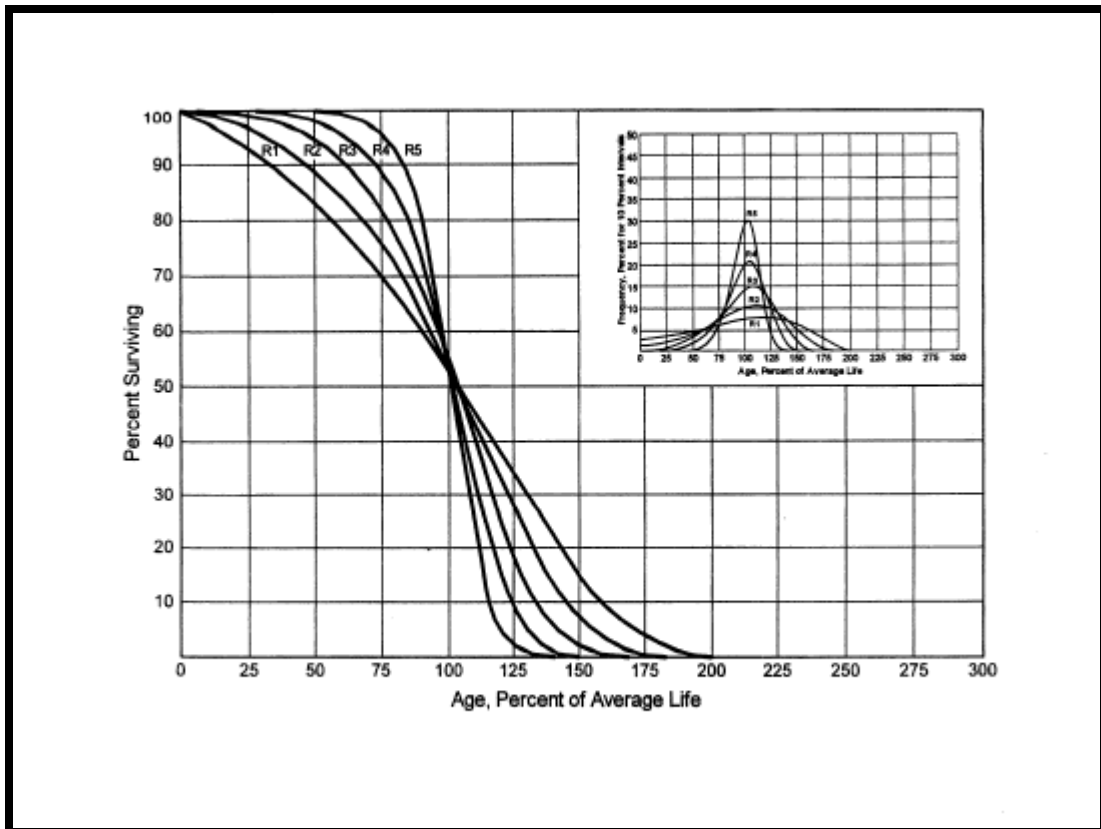
Actuarial analysis was used with each account within a function where sufficient data was available, and judgment was used to some degree on all accounts.

### Survivor Curves

To fully understand depreciation projections in a regulated utility setting, there must be a basic understanding of survivor curves. Individual property units within a group do not normally have identical lives or investment amounts. The average life of a group can be determined by first constructing a survivor curve which is plotted as a percentage of the units surviving at each age. A survivor curve represents the percentage of property remaining in service at various age intervals. The Iowa Curves are the result of an extensive investigation of life characteristics of physical property made at Iowa State College Engineering Experiment Station in the first half of the prior century. Through common usage, revalidation and regulatory acceptance, these curves have become a descriptive standard for the life characteristics of industrial property. An example of an Iowa Curve is shown below.



There are four families in the Iowa Curves that are distinguished by the relation of the age at the retirement mode (largest annual retirement frequency) and the average life. For distributions with the mode age greater than the average life, an "R" designation (i.e., Right modal) is used. The family of "R" moded curves is shown below.



Similarly, an "S" designation (i.e., Symmetric modal) is used for the family whose mode age is symmetric about the average life. An "L" designation (i.e., Left modal) is used for the family whose mode age is less than the average life. A special case of left modal dispersion is the "O" or origin modal curve family. Within each curve family, numerical designations are used to describe the relative magnitude of the retirement frequencies at the mode. A "6" indicates that the retirements are not greatly dispersed from the mode (i.e., high mode frequency) while a "1" indicates a large dispersion about the mode (i.e., low mode frequency). For example, a curve with an average life of 30 years and an "L3" dispersion is a



moderately dispersed, left modal curve that can be designated as a 30 L3 Curve. An SQ, or square, survivor curve occurs where no dispersion is present (i.e., units of common age retire simultaneously).

Most property groups can be closely fitted to one Iowa Curve with a unique average service life. The blending of judgment concerning current conditions and future trends along with the matching of historical data permits the depreciation analyst to make an informed selection of an account's average life and retirement dispersion pattern.

### **Life Span Procedure**

The life span procedure was used for transmission line facilities for which most components are expected to have a retirement date concurrent with the planned retirement date of a generating unit or the expected life cycle of the entire transmission line. The terminal retirement date refers to the year that each transmission line will cease operations. The terminal retirement date along with the interim retirement characteristics of the assets (where applicable) that will retire prior to the facility ceasing operation are used to describe the pattern of retirement of the assets that comprise a unit. The estimated terminal retirement dates for the various transmission lines were determined based on consultation with NYPA management, financial, and engineering staff. Those estimated terminal retirement dates are shown in Appendix C. These terminal retirement dates will be applied to Accounts 354-356: Transmission Towers and Fixtures, Transmission Poles, and Transmission Overhead Conductor. Each line was assumed to have a life-span of 80 year life from the initial installation of the assets.

### **Interim Retirements**

Interim retirements are generally used to model the retirement of individual assets within plant accounts that are modeled using the life-span methodology. The life span procedure assumes all assets are depreciated (straight-line) for the same number of periods and retire at the same time (the terminal retirement date). This

life-span approach was used for Accounts 354, 355 and 356. Adding interim retirement rates to the procedure would reflect some of the assets on a transmission line will be retired prior to the end of the life of the facility and should be depreciated (straight-line) more quickly and retired earlier than the terminal life of the facility. However, NYPA's practice has been to retire few or none of the capital assets in Accounts 354-356 over the history available. For this reason, no interim retirements were assumed for those accounts. The depreciation rates adopted in the Company's previous depreciation study incorporated this for some of NYPA's transmission lines. This study recommends no interim retirements for Accounts 354-356.

### **Actuarial Analysis**

Actuarial analysis (retirement rate method) was used in evaluating historical asset retirement experience where vintage data were available and sufficient retirement activity was present. In actuarial analysis, interval exposures (total property subject to retirement at the beginning of the age interval, regardless of vintage) and age interval retirements are calculated. The complement of the ratio of interval retirements to interval exposures establishes a survivor ratio. The survivor ratio is the fraction of property surviving to the end of the selected age interval, given that it has survived to the beginning of that age interval. Survivor ratios for all of the available age intervals were chained by successive multiplications to establish a series of survivor factors, collectively known as an observed life table. The observed life table shows the experienced mortality characteristic of the account and may be compared to standard mortality curves such as the Iowa Curves. Where data was available, accounts were analyzed using this method. Placement bands were used to illustrate the composite history over a specific era, and experience bands were used to focus on retirement history for all vintages during a set period. The results from these analyses for those accounts which had data sufficient to be analyzed using this method are shown in the Life Analysis section of this report.

### **Judgment**

Any depreciation study requires informed judgment by the analyst conducting the study. A knowledge of the property being studied, company policies and procedures, general trends in technology and industry practice, and a sound basis of understanding depreciation theory are needed to apply this informed judgment. Judgment was used in areas such as survivor curve modeling and selection, depreciation method selection, simulated plant record method analysis, and actuarial analysis.

Judgment is not defined as being used in cases where there are specific, significant pieces of information that influence the choice of a life or curve. Those cases would simply be a reflection of specific facts into the analysis. Where there are multiple factors, activities, actions, property characteristics, statistical inconsistencies, implications of applying certain curves, property mix in accounts or a multitude of other considerations that impact the analysis (potentially in various directions), judgment is used to take all of these factors and synthesize them into a general direction or understanding of the characteristics of the property. Individually, no one factor in these cases may have a substantial impact on the analysis, but overall, may shed light on the utilization and characteristics of assets. Judgment may also be defined as deduction, inference, wisdom, common sense, or the ability to make sensible decisions. There is no single correct result from statistical analysis; hence, there is no answer absent judgment. At the very least for example, any analysis requires choosing which bands to place more emphasis.

The establishment of appropriate average service lives and retirement dispersions for each account requires judgment to incorporate the understanding of the operation of the system with the available accounting information analyzed using the Retirement Rate actuarial methods. The appropriateness of lives and curves depends not only on statistical analyses, but also on how well future retirement patterns will match past retirements.

Current applications and trends in use of the equipment also need to be factored into life and survivor curve choices in order for appropriate mortality characteristics to be chosen.

### **Average Life Group Depreciation**

The most common depreciation system used by regulated utilities is the broad group, average life, remaining life depreciation system. At the request of NYPA, this study continues to use the ALG depreciation procedure to group the assets within each account. After an average service life and dispersion were selected for each account, those parameters were used to estimate what portion of the surviving investment of each vintage was expected to retire. The depreciation of the group continues until all investment in the vintage group is retired. ALG is defined by their respective account dispersion, life, and salvage estimates. A straight-line rate for each ALG is calculated by computing a composite remaining life for each group across all vintages within the group, dividing the remaining investment to be recovered by the remaining life to find the annual depreciation expense and dividing the annual depreciation expense by the surviving investment. The resultant rate for each ALG group is designed to recover all retirements less net salvage when the last unit retires. The ALG procedure recovers net book cost over the life of each account by averaging many components.

### **Theoretical Depreciation Reserve**

This study used a reserve model that relied on a prospective concept relating future retirement and accrual patterns for property, given current life and salvage estimates. The theoretical reserve of a group is developed from the estimated remaining life, total life of the property group, and estimated net salvage. The theoretical reserve represents the portion of the group cost that would have been accrued if current forecasts were used throughout the life of the group for future depreciation accruals. The computation involves multiplying the vintage balances within the group by the theoretical reserve ratio for each vintage. The average life group method requires an estimate of dispersion and service life to establish how much of each vintage is expected to be retired in each year until all property within the group is retired. Estimated average service lives and dispersion determine the amount within each average life group. The straight-line remaining-life theoretical reserve ratio at any given age (RR) is calculated as:

$$RR = 1 - \frac{(Average\ Remaining\ Life)}{(Average\ Service\ Life)} * (1 - Net\ Salvage\ Ratio)$$

The accumulated book depreciation reserve by account was compared to the theoretical reserve model based on the proposed life and net salvage parameters. Differences between book and theoretical reserves are recovered over the remaining life for each group.

## DETAILED DISCUSSION

### Depreciation Study Process

This depreciation study encompassed four distinct phases. The first phase involved data collection and field interviews. The second phase was where the initial data analysis occurred. The third phase was where the information and analysis was evaluated. Once the first three stages were complete, the fourth phase began. This phase involved the calculation of depreciation rates and documenting the corresponding recommendations.

During the Phase I data collection process, historical data was compiled from continuing property records and general ledger systems. Data was validated for accuracy by extracting and comparing to multiple financial system sources. Audit of this data was validated against historical data from prior periods, historical general ledger sources, and field personnel discussions. This data was reviewed extensively to put in the proper format for a depreciation study. Further discussion on data review and adjustment is found in the Salvage Considerations Section of this study. Also as part of the Phase I data collection process, numerous discussions were conducted with engineers and field operations personnel to obtain information that would assist in formulating life and salvage recommendations in this study. One of the most important elements of performing a proper depreciation study is to understand how the Company utilizes assets and the environment of those assets. Interviews with engineering and operations personnel are important ways to allow the analyst to obtain information that is beneficial when evaluating the output from the life and net salvage programs in relation to the Company's actual asset utilization and environment. Information that was gleaned in these discussions is found both in the Detailed Discussion of this study in the life analysis and salvage analysis sections and also in workpapers.

Phase 2 is where the actuarial analysis is performed. Phase 2 and 3 overlap to a significant degree. The detailed property records information is used in phase 2 to develop observed life tables for life analysis. These tables are visually compared

to industry standard tables to determine historical life characteristics. It is possible that the analyst would cycle back to this phase based on the evaluation process performed in phase 3. Net salvage analysis consists of compiling historical salvage and removal data by functional group to determine values and trends in gross salvage and removal cost. This information was then carried forward into phase 3 for the evaluation process.

Phase 3 is the evaluation process which synthesizes analysis, interviews, and operational characteristics into a final selection of asset lives and net salvage parameters. The historical analysis from phase 2 is further enhanced by the incorporation of recent or future changes in the characteristics or operations of assets that were revealed in phase 1. Phases 2 and 3 allow the depreciation analyst to validate the asset characteristics as seen in the accounting transactions with actual Company operational experience.

Finally, Phase 4 involved the calculation of accrual rates, making recommendations and documenting the conclusions in a final report. The calculation of accrual rates is found in Appendix A. Recommendations for the various accounts are contained within the Detailed Discussion of this report. The depreciation study flow diagram shown as Figure 1<sup>1</sup> documents the steps used in conducting this study. Depreciation Systems<sup>2</sup>, page 289 documents the same basic processes in performing a depreciation study which are: Statistical analysis, evaluation of statistical analysis, discussions with management, forecast assumptions, and document recommendations.

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<sup>1</sup>INTRODUCTION TO DEPRECIATION FOR PUBLIC UTILITIES & OTHER INDUSTRIES, AGA EEI (2013).

<sup>2</sup>Depreciation Systems, F.K. Wolf & W.C. Fitch, Iowa State University Press, 1994.

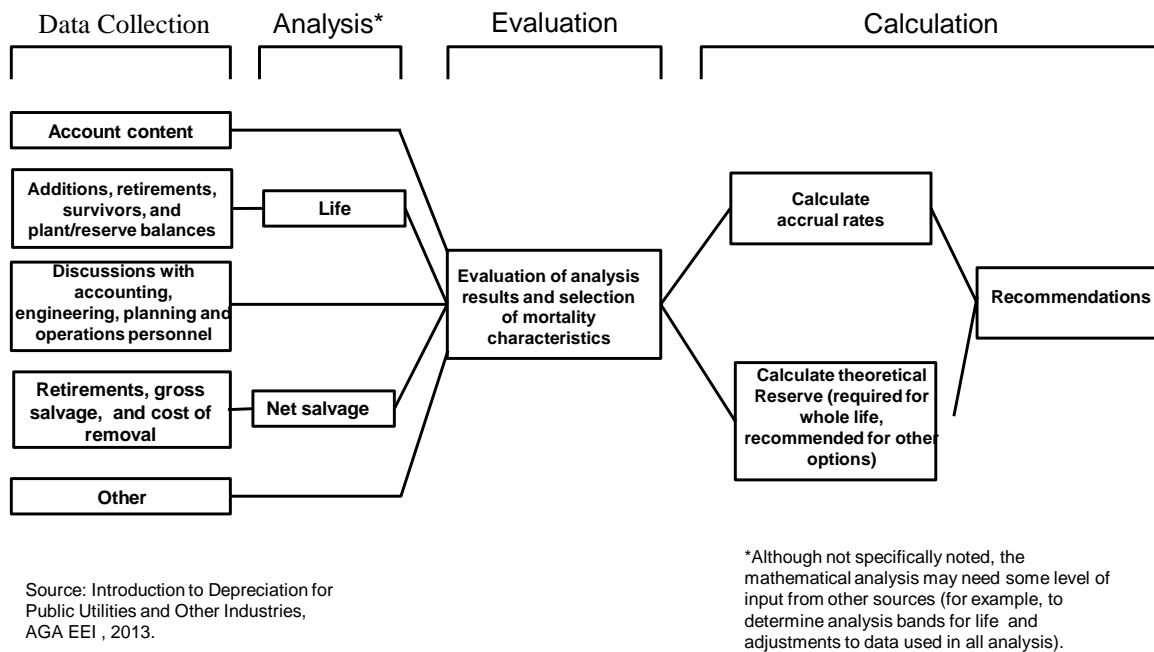


Figure 1

## NEW YORK POWER AUTHORITY DEPRECIATION STUDY PROCESS



### **Depreciation Rate Calculation**

Annual depreciation expense amounts for the depreciable accounts of NYPA were calculated by the straight-line method, average life group procedure, and remaining-life technique. With this approach, remaining lives were calculated according to standard ALG expectancy techniques, using the Iowa Survivor Curves noted in the calculation. For each plant account, the difference between the surviving investment, adjusted for estimated net salvage, and the allocated book depreciation reserve, was divided by the average remaining life to yield the annual depreciation expense. These calculations are shown in Appendix A.

### **Remaining Life Calculation**

The establishment of appropriate average service lives and retirement dispersions for each account within a functional group was based on engineering judgment that incorporated available accounting information analyzed using the Retirement Rate actuarial methods. After establishment of appropriate average service lives and retirement dispersions, a remaining life was computed for each account. The composite remaining life for each account was determined by direct weighting (i.e. by multiplying vintage investment by the vintage remaining life and dividing by the plant balance for each account).

### **Account Calculation Process**

Annual depreciation expense amounts for accounts other than production were calculated by the straight line, remaining life procedure.

In a whole life representation, the annual accrual rate is computed by the following equation,

$$\text{Annual Accrual Rate} = \frac{(100\% - \text{Net Salvage Percent})}{\text{Average Service Life}}$$

Use of the remaining life depreciation system adds a self-correcting mechanism, which accounts for any differences between theoretical and book depreciation reserve over the remaining life of the group. With the straight line, remaining life, average life group system using Iowa Curves, composite remaining lives were calculated according to standard broad group expectancy techniques, noted in the formula below:

$$\text{Composite Remaining Life} = \frac{\sum \text{Original Cost} - \text{Theoretical Reserve}}{\sum \text{Whole Life Annual Accrual}}$$

For each plant account, the difference between the surviving investment, adjusted for estimated net salvage, and the allocated book depreciation reserve, was divided by the composite remaining life to yield the annual depreciation expense as noted in this equation.

$$\text{Annual Depreciation Expense} = \frac{\text{Original Cost} - \text{Book Reserve} - (\text{Original Cost}) * (\text{Net Salvage \%})}{\text{Composite Remaining Life}}$$

where the net salvage percent represents future net salvage.

Within a group, the sum of the group annual depreciation expense amounts, as a percentage of the depreciable original cost investment summed, gives the annual depreciation rate as shown below:

$$\text{Annual Depreciation Rate} = \frac{\sum \text{Annual Depreciation Expense}}{\sum \text{Original Cost}}$$

These calculations are shown in Appendix A.

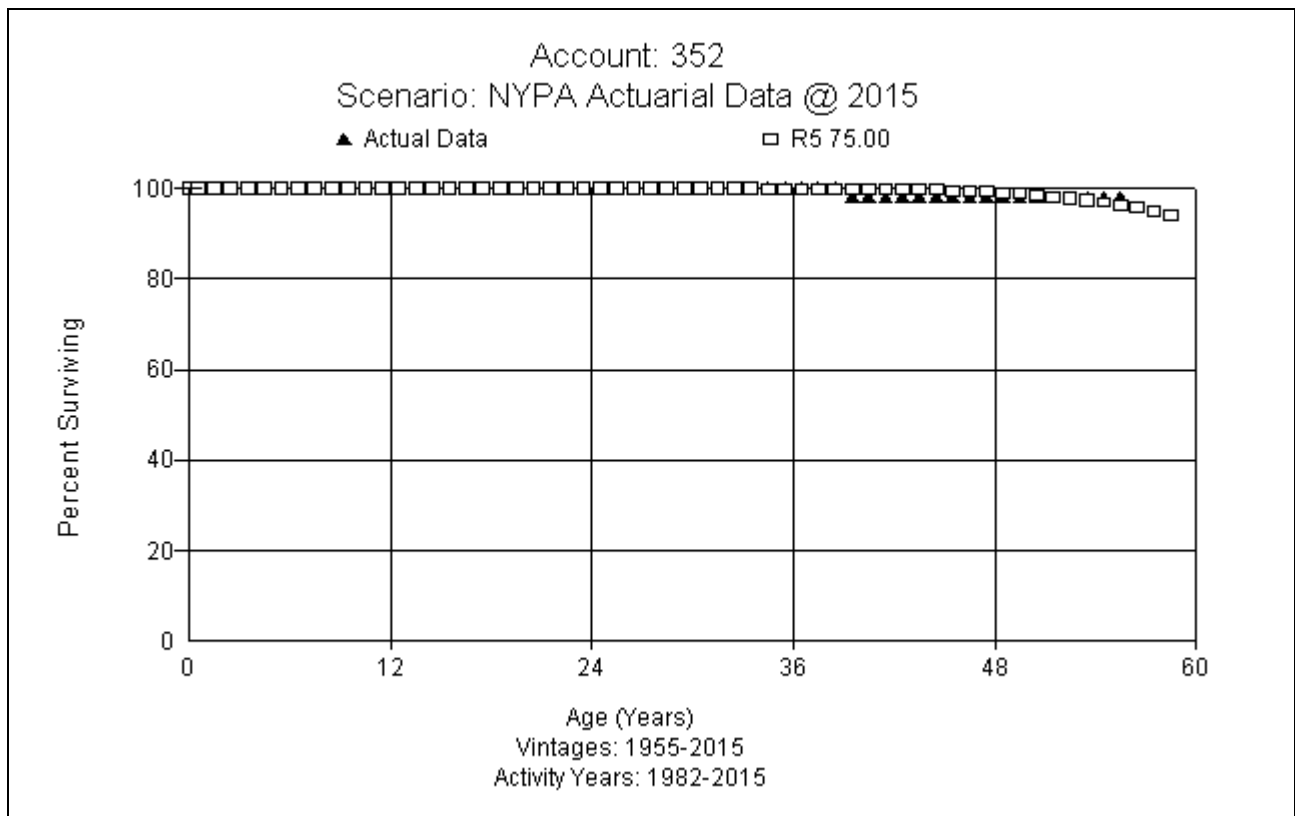
### **Life Analysis**

The retirement rate actuarial analysis method was applied to all accounts for NYPA where sufficient retirement activity was available for analysis. For each account, an actuarial retirement rate analysis was made with placement and experience bands of varying width. The historical observed life table was plotted and compared with various Iowa Survivor Curves to obtain the most appropriate match. A selected curve for each account is shown in the Life Analysis Section of this report. The observed life tables for all analyzed placement and experience bands are provided in workpapers.

For each account on the overall band (i.e. placement from earliest vintage year which varied for each account through 2015), approved lives were used as a starting point. Then using the same average life, various dispersion curves were plotted. Frequently, visual matching would confirm one specific dispersion pattern (i.e. L, S. or R) as an obviously better match than others. The next step would be to determine the most appropriate life using that dispersion pattern. Retirement experience began in 1982. For each account, the overall experience band, 1982-2015 was analyzed. Next placement bands of varying width were plotted with each experience band discussed above. For most accounts an overall placement band was analyzed along with shorter bands of approximately 20 and 50 years respectively. Repeated matching usually pointed to a focus on one dispersion family and small range of service lives. The goal of visual matching was to minimize the differential between the observed life table and Iowa curve in top and mid range of the plots. These results are used in conjunction with all other factors that may influence asset lives.

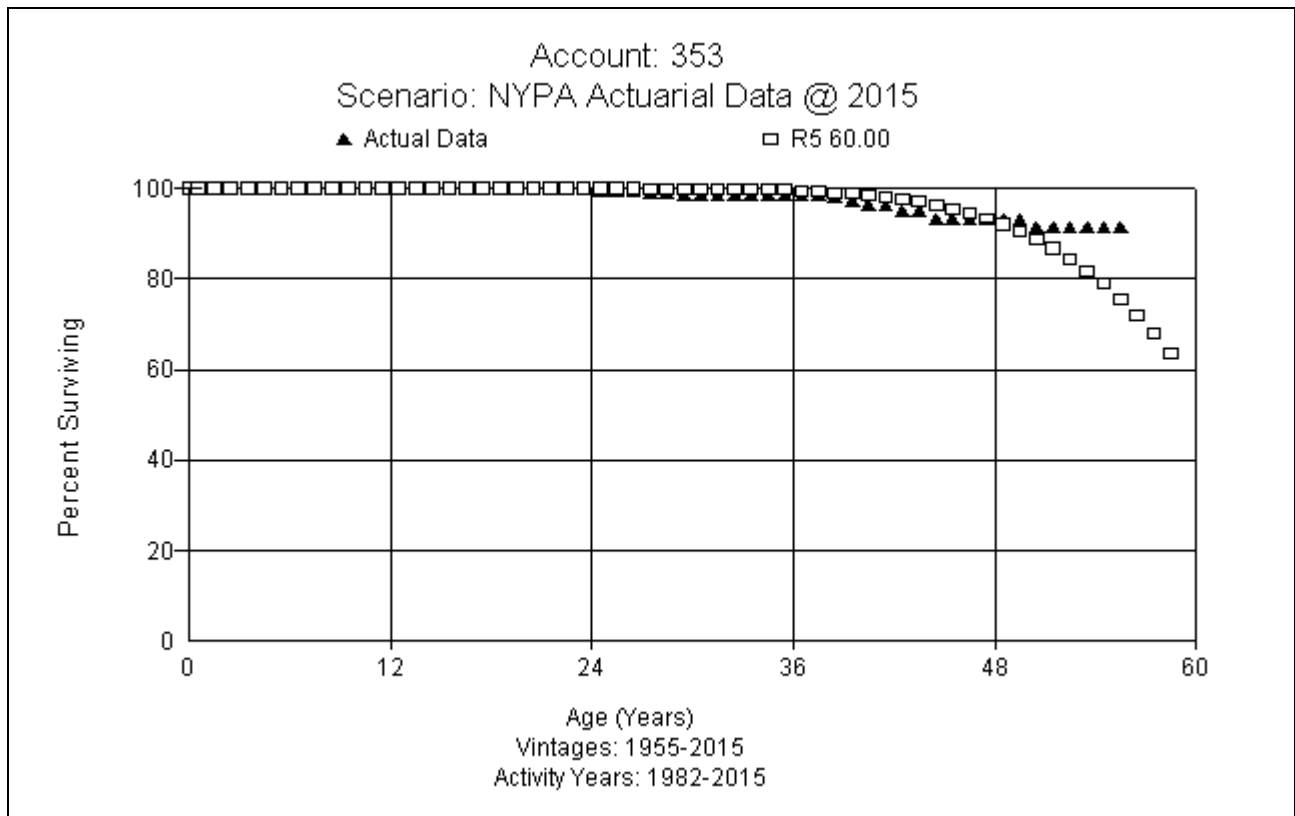
**TRANSMISSION PLANT****Transmission Plant Accounts, FERC Accounts 352.00-359.00****FERC Account 352.00 Substation Structures & Improvements 75 R5**

This account consists of control building, fencing, landscaping/yard surfacing and station lighting. The current balance is \$81.4 million for this account. This account has an existing life of 75 R5. After considering the type and characteristics of assets in this account and reviewing various limited analysis bands, this study recommends retaining a 75 R5 dispersion curve. The appropriate life and dispersion curve was selected for this account based on the actuarial analysis of the range of lives and curves applicable to the historical activity for this account. A graph of the proposed curve and the actual data are shown below.



### FERC Account 353.00 Station Equipment 60 R5

This account includes the cost of transformers, capacitor banks, circuit breakers, cubicle switchgear, equipment foundation, station controls and station wiring for transmission plant. The current balance is \$497.2 million for this account. This account has an existing life of 50 R5. Based on the type of assets in this group and the available actuarial analysis, this study recommends a 60 R5 dispersion curve. The appropriate life and dispersion curve was selected for this account based on the actuarial analysis of the range of lives and curves applicable to the historical activity for this account. A graph of the proposed curve and the actual data are shown below.



**FERC Account 354.00 Transmission Towers & Fixtures 80 SQ**

This account consists of concrete foundations and lattice transmission structures. The current balance is \$206.5 million for this account. This account has an existing life of 65 R5. NYPA has historically retired very little investment in this account and treats individual transmission lines as life-cycle or lifespan types of assets. The Company projects a reasonable life span for its existing transmission lines is 80 years. Considering the assets in the account as well as the Company's practices and subject matter expert input, this study recommends an 80 SQ dispersion curve. No graph is provided below.

**FERC Account 355.00 Poles & Fixtures 80 SQ**

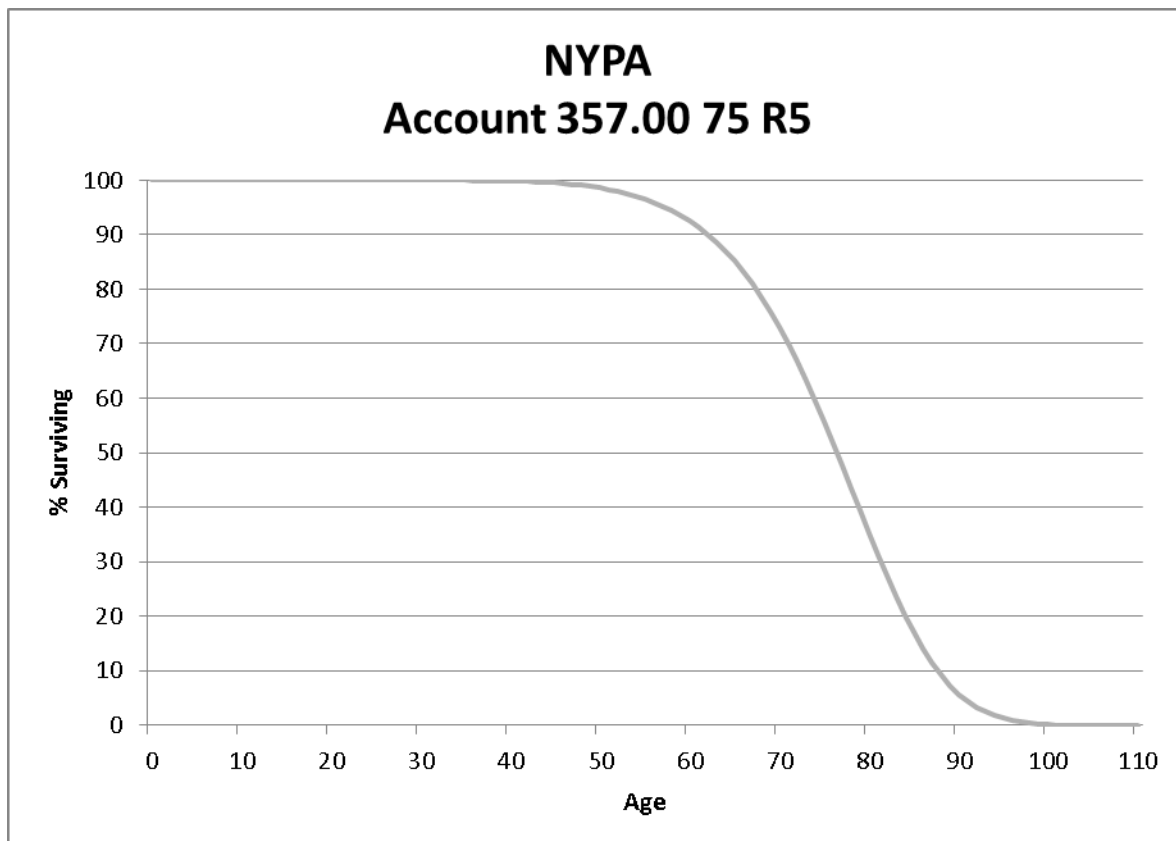
This account includes equipment foundation and many kinds of poles for transmission plant. The current balance is \$238.1 million for this account. This account has an existing life of 55 R4. NYPA has historically retired very little investment in this account and treats individual transmission lines as life-cycle or lifespan types of assets. The Company projects a reasonable life span for its existing transmission lines is 80 years. Considering the assets in the account as well as the Company's practices and subject matter expert input, this study recommends an 80 SQ dispersion curve. No graph is provided below.

**FERC Account 356.00 Overhead Conductor and Devices 80 SQ**

This account consists of conductors and insulators. The current balance is \$207.8 million for this account. This account has an existing life of 55 R5. NYPA has historically retired very little investment in this account and treats individual transmission lines as life-cycle or lifespan types of assets. The Company projects a reasonable life span for its existing transmission lines is 80 years. Considering the assets in the account as well as the Company's practices and subject matter expert input, this study recommends an 80 SQ dispersion curve. No graph is provided below.

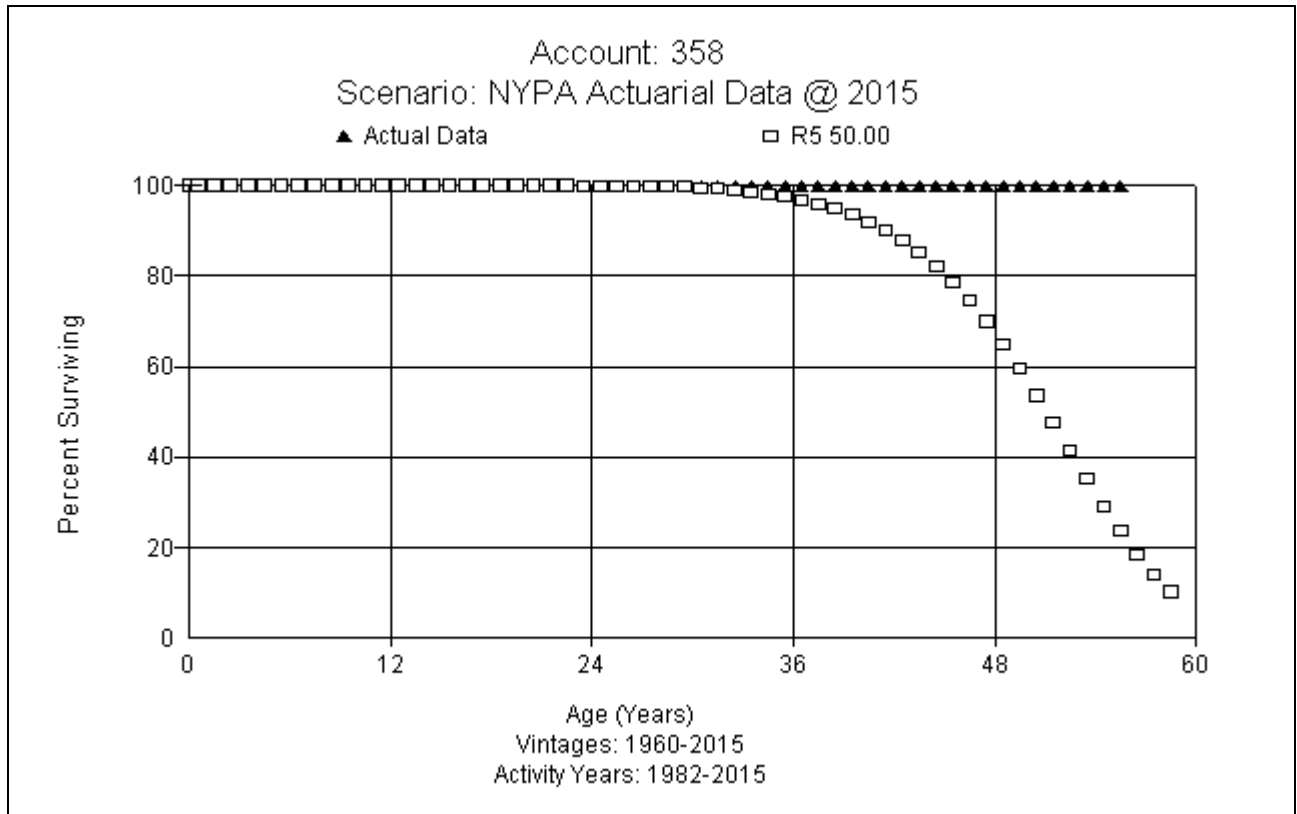
### FERC Account 357.00 Underground Conduit 75 R5

This account consists of electric transmission conduit, electric manholes, vaults, tunnels, and spreader head assembly. The current balance is \$44.0 million for this account. This account has an existing life of 75 R5. After reviewing the types of assets in the account and considering the life of the conductor contained in this conduit, this study recommends retaining a 75 R5 dispersion curve. The recommended life and dispersion curve is shown below.



### FERC Account 358.00 Underground Conductors and Devices 50 R5

This account consists of conductors, line potheads, pipeline oil pumps, and underground cable. The current balance is \$13.5 million for this account. This account has an existing life of 50 R5. After reviewing various analysis bands and the account's asset characteristics, this study recommends retaining a 50 R5 dispersion curve. The appropriate life and dispersion curve (an example of which is shown below) was selected for this account based on the characteristics of the assets within this account and the actuarial analysis of the range of lives and curves applicable to the historical activity for this account. A graph of the proposed curve versus the actual data is shown below.





**FERC Account 359.00 Roads and Trails 100 SQ**

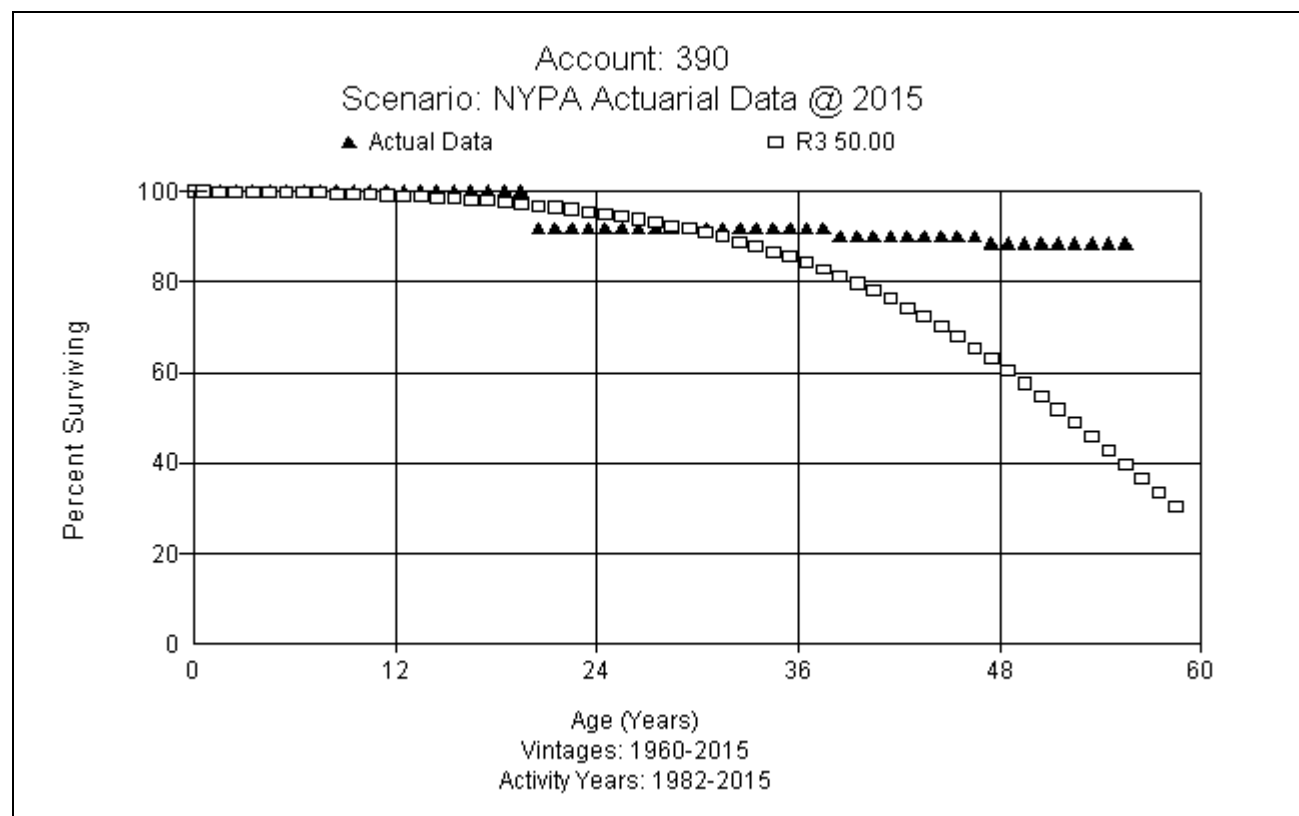
This account consists of bridges, trails, and roads. The current balance is \$28.5 million for this account. There is insufficient history to analyze this account with actuarial analysis. This account has an existing life of 100 SQ. Based on the characteristics of the assets in this account, this study recommends retaining a 100 SQ dispersion curve. No graph is provided below.

## GENERAL PLANT

### **General Plant Depreciated Accounts, FERC Accounts 390.00, 392.00-396.00, and 398.00**

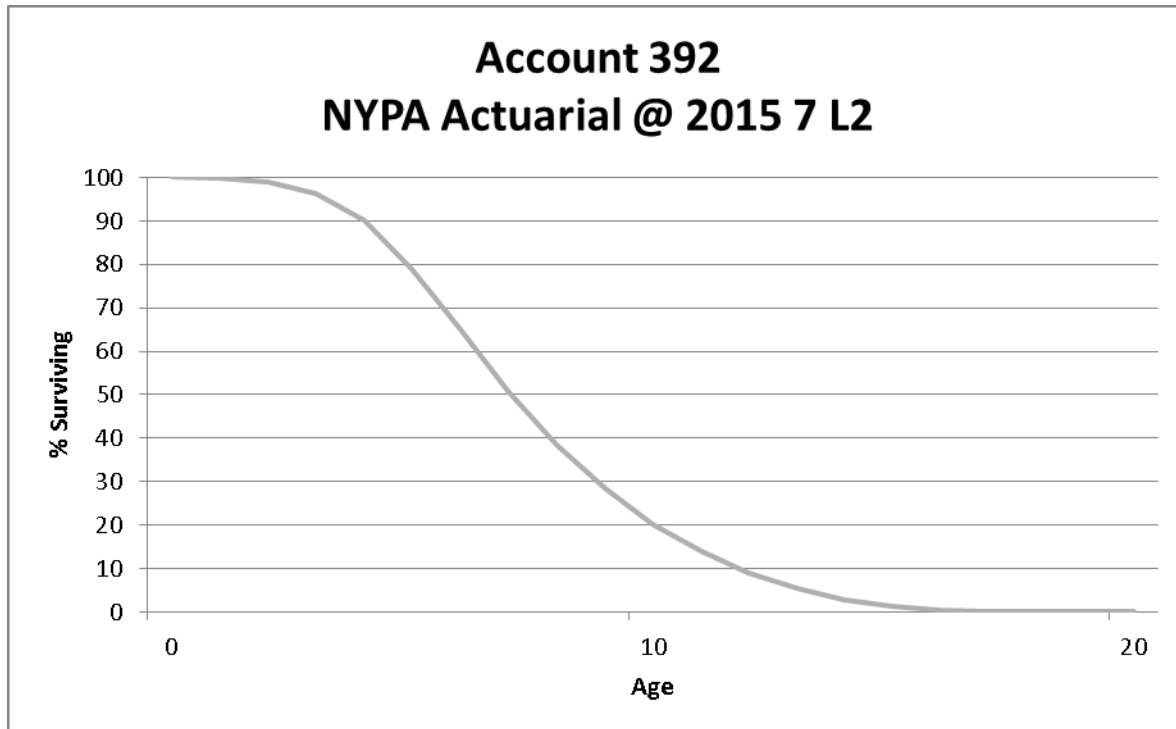
#### **FERC Account 390.00 General Plant Structures & Improvements 50 R3**

This account includes the cost of general structures and improvements used for utility service. There is approximately \$156.9 million in this account. The current life of this account is 50 R3. Based on actuarial analysis and understanding of the assets in the account, this study recommends retention of 50 R3 dispersion curve. A graph of the actual data versus the proposed survivor curve is shown below.



### FERC Account 392.00 Transportation Equipment 7 L2

This account consists of transportation equipment such as trailers used for general utility service. There is approximately \$45.1 million in this account. The existing life for this account is a 10 L2. Based on the assets in the account and review of actuarial analysis for these assets, this study recommends a 7 L2 dispersion curve. A graph of the proposed survivor curve is shown below.



**FERC Account 393.00 Stores Equipment 30 SQ**

This account consists of stores equipment such as shelving used for general utility service. There is approximately \$1.1 million in this account. The existing life for this account is 30 R2.5. Based on the assets in the account and knowledge of the characteristics of similar assets, this study recommends a 30 SQ dispersion curve.

**FERC Account 394.00 Tools, Shop, and Garage Equipment 20 SQ**

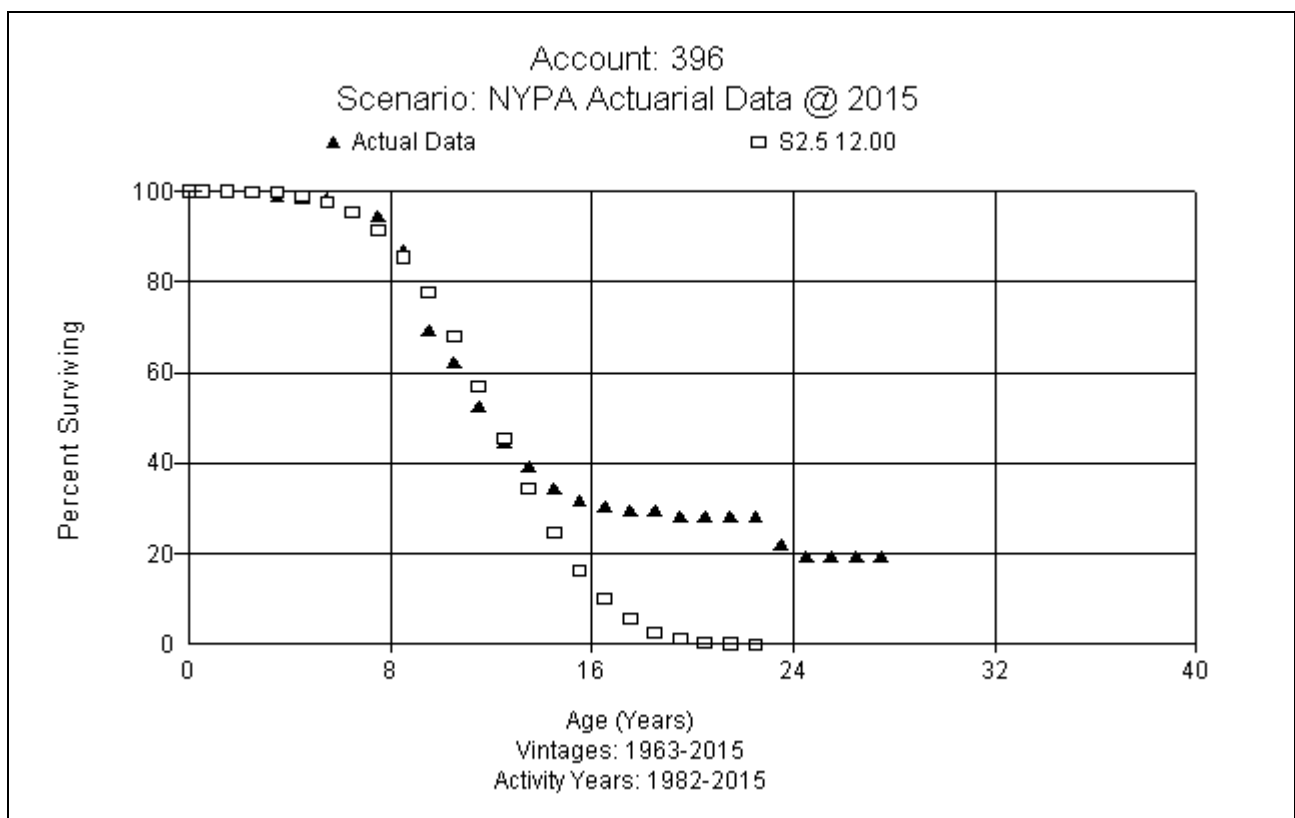
This account consists of various items or tools used in shop and garages such as air compressors, grinders, mixers, hoists, and cranes. There is approximately \$14.6 million in this account. The existing life for this account is 20 R1.5. Based on limited retirement data and knowledge of the characteristics of similar assets, this study recommends a 20 SQ dispersion curve.

**FERC Account 395.00 Laboratory Equipment 20 SQ**

This account consists of laboratory equipment such as test equipment used for general utility service. There is approximately \$28.2 million in this account. The existing life for this account is 25 S3. Based on the assets in the account and knowledge of the characteristics of similar assets, this study recommends a 20 SQ dispersion curve.

### FERC Account 396.00 Power Operated Equipment 12 S2.5

This account consists of power operated equipment used in general utility service. There is approximately \$15.7 million in this account. The existing life for this account is 10 L3. Based on the assets in the account and review of actuarial analysis for these assets, this study recommends an 12 S2.5 dispersion curve. A graph of the actual data versus the proposed survivor curve is shown below.



**FERC Account 398.00 Miscellaneous Equipment 20 SQ**

This account consists of miscellaneous equipment used for general utility service. There is approximately \$49.0 million in this account. The existing life for this account is 25 S2. After considering the types and characteristic of assets in this account and reviewing various analysis bands, this study recommends a 20 SQ dispersion curve.

## **GENERAL PLANT AMORTIZED ACCOUNTS**

### **General Plant Amortized Accounts 391.00-391.30, 397.00 and 399.00**

#### **Adoption of Vintage Group Amortization**

This study recommends the adoption of vintage group amortization for certain General plant accounts. In the case of NYPA, this study recommends amortization for accounts 391, 391.2, 391.3, 397, and 399.

FERC adopted Accounting Release 15 in 1997 using the following criteria:

1. The individual classes of assets for which vintage year accounting is followed are high volume, low value items;
2. There is no change in existing retirement unit designations, for purposes of determining when expenditures are capital or expense;
3. The cost of the vintage groups is amortized to depreciation expense over their useful lives and there is no change in depreciation rates resulting from the adoption of the vintage year accounting;
4. Interim retirements are not recognized;
5. Salvage and removal cost relative to items in the vintage categories are included in the accumulated depreciation account and assigned to the oldest vintage first; and
6. Properties are retired from the affected accounts that, at the date of the adoption of vintage year accounting, meet or exceed the average service life of properties in that account.

A vintage year method of accounting for the general plant accounts that meets all of the foregoing requirements may be implemented without obtaining specific authorization from the Commission to do so.

To implement this amortization mechanism, it is necessary to first retire the assets whose age is longer than the recommended service life for each group. It will no longer be necessary to track of the location and retirement of those assets. Those amounts are shown for each account in Appendix A-1. After those assets are retired, the remaining

plant in service for each account will be amortized using the amortization rates shown in Appendix A-1 and A-2. Annually, assets which reach the average service life of each account will be retired when the assets reach their average service life. In addition, an additional accrual is necessary for each plant account to make up the difference between the book depreciation reserve and the theoretical depreciation reserve. Those amounts will be accrued until the total reserve difference for each account shown in Appendix A-2. For example in Blenheim Gllboa, Account 391 will require an annual accrual of \$(374) annually for 3.20 years until the reserve difference of \$1,197 has been accumulated. At that point the additional annual accrual will cease.

#### **FERC Account 391.00 Office Furniture and Fixtures 10 SQ**

This account consists of miscellaneous office furniture such as desks, chairs, filing cabinets, and tables used for general utility service. This account is recommended for implementation of AR15. There is approximately \$74.9 million in this account, and after the retirement of fully accrued assets, the plant balance is \$10.5 million. The existing life for this account is 30 S2. Based on judgment in analyzing similar assets, this study recommends a 10 SQ dispersion curve.

#### **FERC Account 391.20 Computer Equipment 5 SQ**

This account consists of computer equipment used for general utility service. This account is recommended for implementation of AR15. There is approximately \$65.8 million in this account, and after the retirement of fully accrued assets, the plant balance is \$16.6 million. The existing life for this account is 30 S2. Based on historical analysis and an understanding of the characteristics of assets in this account, this study recommends a 5 SQ dispersion curve.

#### **FERC Account 391.30 Computer Equipment 10 SQ**

This account consists of computer equipment used for general utility service. This account is recommended for implementation of AR15. There is approximately \$92.1 million in this account, and after the retirement of fully accrued assets, the plant balance is \$59.6



million. The existing life for this account is 30 S2. Based on historical analysis and an understanding of the characteristics of assets in this account, this study recommends a 10 SQ dispersion curve.

**FERC Account 397.00 Communication Equipment 15 SQ**

This account consists of communication equipment such as fiber optic cables, routers, and telephone/radio equipment. This account is recommended for implementation of AR15. There is approximately \$28.2 million in this account, and after the retirement of fully accrued assets, the plant balance is \$7.3 million. The existing life for this account is 15 S3. After considering the types and characteristic of assets in this account and reviewing various analysis bands, this study recommends a 15 SQ dispersion curve.

**FERC Account 399.00 Other Tangible Equipment 15 SQ**

This account consists of other tangible property. This account is recommended for implementation of AR15. There is approximately \$4.3 million in this account, and after the retirement of fully accrued assets, the plant balance is \$4.3 million. The existing life for this account is 15 SQ. After considering the types and characteristic of assets in this account and reviewing various analysis bands, this study recommends a 15 SQ dispersion curve.

### **Salvage Analysis**

When a capital asset is retired, physically removed from service and finally disposed of, terminal retirement is said to have occurred. The residual value of a terminal retirement is called gross salvage. Net salvage is the difference between the gross salvage (what the asset was sold for) and the removal cost (cost to remove and dispose of the asset).

Salvage and removal cost percentages are calculated by dividing the current cost of salvage or removal by the original installed cost of the asset. Some plant assets can experience significant negative removal cost percentages due to the timing of the original addition versus the retirement. For example, a transmission asset in FERC Account 355 with a current installed cost of \$500 (2016) would have had an installed cost of \$9.05<sup>3</sup> in 1936 (which is the proposed average life of the account). A removal cost of \$50 for the asset calculated (incorrectly) on current installed cost would only have a negative 10 percent removal cost (\$50/\$500). However, a correct removal cost calculation would show a 552 percent removal cost for that asset (\$50/\$9.05). Inflation from the time of installation of the asset until the time of its removal must be taken into account in the calculation of the removal cost percentage because the depreciation rate, which includes the removal cost percentage, will be applied to the original installed cost of assets. The net salvage analysis uses the history of the individual accounts to estimate the future net salvage that NYPA can expect in its operations. As a result, the analysis not only looks at the historical experience of NYPA, but also takes into account recent and expected changes in operations that could reasonably lead to different future expectations for net salvage than were experienced in the past.

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3 Using the Handy-Whitman Bulletin No. 183, E-1, line 36, \$9.05 = \$500 x 12/663.

### **Salvage Characteristics**

NYPA does not book cost of removal for most of its accounts. The existing net salvage percentages were based on estimates of removal cost to remove NYPA transmission facilities in 1996. To develop data for a similar analysis, one of NYPA's largest replacement projects was used as a proxy for terminal net salvage. The summary of net salvage is shown in Appendix D.

The project used to estimate demolition costs was for the replacement of St. Lawrence MA1 and MA2 transmission lines. Included in this analysis was the St. Lawrence Moses Substation; the Adirondack Substation; the MA1 transmission line - 1 230kV oil circuit breaker, 3 disconnect switches, 1 wave trap, 1 surge arrester, 1 coupling capacitor, 1 voltage transformer with carrier accessories, 2 current transformers, and associated line supports and foundations; and the MA2 transmission line - 1 230kV oil circuit breaker, 3 disconnect switches, 1 wave trap, 1 surge arrester, 1 coupling capacitor, 1 voltage transformer with carrier accessories, 2 current transformers, and associated line supports and foundations. The summary results are shown in Appendix D-1.

### **Transmission Plant and General Plant**

A brief discussion of the existing net salvage and current study recommendations for each account in those functions follow below.

### **TRANSMISSION PLANT**

#### **Transmission Plant Accounts, FERC Accounts 352.00-359.00**

##### **FERC Account 352.00 Substation Structures & Improvements (- 3%)**

This account consists of control building, fencing, landscaping/yard surfacing and station lighting. The current net salvage percentage is negative 25 percent. As shown in Appendix D-1, the proxy project produces a net salvage estimate of negative 3 percent. To moderate expectations of the future, this study recommends a negative 3 percent net salvage rate for this account.

##### **FERC Account 353.00 Station Equipment (- 3%)**

This account consists of substation equipment. The current net salvage percentage is negative 15 percent. As shown in Appendix D-1, the proxy project produces a net salvage estimate of negative 3 percent. To moderate expectations of the future, this study recommends a negative 3 percent net salvage rate for this account.

##### **FERC Account 354.00 Transmission Towers & Fixtures (- 100%)**

This account consists of concrete foundations and lattice transmission structures. The current net salvage percentage is negative 40 percent. As shown in Appendix D-1, the proxy project produces a net salvage estimate of negative 768 percent. To moderate expectations of the future, this study recommends negative 100 percent net salvage rate for this account.

##### **FERC Account 355.00 Poles & Fixtures (- 100%)**

This account consists of transmission poles and foundations. The current net salvage percentage is negative 40 percent. As shown in Appendix D-1, the proxy project

produces a net salvage estimate of negative 768 percent. To moderate expectations of the future, this study recommends negative 100 percent net salvage rate for this account.

**FERC Account 356.00 Overhead Conductor and Devices (- 100%)**

This account consists of conductors and insulators. The current net salvage percentage is negative 20 percent. As shown in Appendix D-1, the proxy project produces a net salvage estimate of negative 768 percent. To moderate expectations of the future, this study recommends negative 100 percent net salvage rate for this account.

**FERC Account 357.00 Underground Conduit (- 5%)**

This account consists of electric transmission pipe, electric manholes, vaults, tunnels, and spreader head assembly. The current net salvage percentage is negative 5 percent. When retired, much of this equipment will be abandoned in place. Based on judgment, this study recommends retaining negative 5 percent net salvage rate for this account.

**FERC Account 358.00 Underground Conductor and Devices (- 5%)**

This account consists of conductors, line potheads, pipeline oil pumps, and underground cable. The current net salvage percentage is negative 15 percent. Based on judgment, this study recommends moving to negative 5 percent net salvage rate for this account.

**FERC Account 359.00 Roads and Trails (0%)**

This account consists of bridges, trails, and roads. The current net salvage percentage is negative 20 percent. Based on the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

## **GENERAL PLANT**

### **General Plant Accounts, FERC Accounts 390.00- 399.00**

#### **FERC Account 390.00 General Plant Structures & Improvements (0%)**

This account includes the cost of general structures and improvements used for utility service. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

#### **FERC Account 391.00 Office Furniture and Fixtures (0%)**

This account consists of miscellaneous office furniture such as desks, chairs, filing cabinets, and tables used for general utility service. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

#### **FERC Account 391.2 Computer Equipment 5 Year (0%)**

This account consists of computer equipment with a five year life used for general utility service. T The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

#### **FERC Account 391.2 Computer Equipment 10 Year (0%)**

This account consists of computer equipment with a ten year life used for general utility service. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

#### **FERC Account 392.00 Transportation Equipment (0%)**

This account consists of transportation equipment such as trailers used for general utility service. Based on judgment, this study recommends a 0 percent net salvage rate for

this account.

**FERC Account 393.00 Stores Equipment (0%)**

This account consists of stores equipment such as shelving. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

**FERC Account 394.00 Tools, Shop, and Garage Equipment (0%)**

This account consists of various items or tools used in shop and garages such as air compressors, grinders, mixers, hoists, and cranes. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

**FERC Account 395.00 Laboratory Equipment (0%)**

This account consists of laboratory equipment such as testing equipment. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

**FERC Account 396.00 Power Operated Equipment (0%)**

This account consists of power operated equipment used in general utility service. Based on judgment, this study recommends a 0 percent net salvage rate for this account.

**FERC Account 397.00 Communication Equipment (0%)**

This account consists of communication equipment such as fiber optic cables, routers, and telephone/radio equipment. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

**FERC Account 398.00 Miscellaneous Equipment (0%)**

This account consists of miscellaneous equipment. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.

**FERC Account 399.00 Other Tangible Property (0%)**

This account consists of other tangible property. The current net salvage percentage is 0 percent. Based on judgment and the type of assets in this account, this study recommends retention of 0 percent net salvage rate for this account.



**APPENDIX A**

**Computation of Depreciation Accrual Rate**

**NEW YORK POWER AUTHORITY**  
**COMPUTATION OF ANNUAL DEPRECIATION RATE**  
**At December 31, 2015**

Account	Account Description	Plant Balance at 12/31/2015 \$	Accumulated Depreciation at 12/31/2015 \$	Net Salvage %	Net Salvage Amount \$	Unaccrued Balance \$	Remaining Life Yrs	Annual Accrual \$	Annual Accrual %
<b>TRANSMISSION PLANT</b>									
<b><u>Blenheim Gilboa</u></b>									
	352 Structures & Improvements	4,317,717	3,261,144	-3%	(129,532)	1,186,105	42.45	27,941	0.65%
	353 Station Equipment	51,222,730	12,375,234	-3%	(1,536,682)	40,384,178	50.23	803,985	1.57%
	354 Towers & Fixtures	22,612,274	19,611,752	-100%	(22,612,274)	25,612,796	45.50	562,919	2.49%
	355 Poles & Fixtures	1,953,118	2,063,800	-100%	(1,953,118)	1,842,436	45.50	40,493	2.07%
	356 Overhead Conductors & Devices	9,403,929	8,268,431	-100%	(9,403,929)	10,539,427	45.50	231,636	2.46%
	359 Roads & Trails	670,808	389,416	0%	0	281,392	65.50	4,296	0.64%
	Total Blenheim Gilboa	90,180,576	45,969,777		(35,635,534)	79,846,333		1,671,270	
<b><u>J. A. FitzPatrick</u></b>									
	354 Towers & Fixtures	10,051,183	12,375,568	-100%	(10,051,183)	7,726,798	39.50	195,615	1.95%
	356 Overhead Conductors & Devices	5,926,677	6,627,436	-100%	(5,926,677)	5,225,918	39.50	132,302	2.23%
	359 Roads & Trails	80,335	73,914	0%	0	6,421	59.50	108	0.13%
	Total J. A. Fitzpatrick	16,058,195	19,076,918		(15,977,860)	12,959,137		328,025	
<b><u>Marcy South</u></b>									
	353 Station Equipment	23,088,723	13,315,284	-3%	(692,662)	10,466,101	35.03	298,775	1.29%
	354 Towers & Fixtures	75,439,776	43,735,773	-100%	(75,439,776)	107,143,779	52.50	2,040,834	2.71%
	355 Poles & Fixtures	210,096,383	151,634,239	-100%	(210,096,383)	268,558,527	52.50	5,115,401	2.43%
	356 Overhead Conductors & Devices	105,799,660	62,225,351	-100%	(105,799,660)	149,373,969	52.50	2,845,218	2.69%
	357 Underground Conduit	43,951,419	20,285,420	-5%	(2,197,571)	25,863,570	47.69	542,327	1.23%
	358 Underground Conductors & Devices	12,314,493	7,712,164	-5%	(615,725)	5,218,054	22.73	229,567	1.86%
	359 Roads & Trails	22,421,909	7,659,769	0%	0	14,762,140	73.03	202,138	0.90%
	Total Marcy South	493,112,363	306,568,000		(394,841,776)	581,386,139		11,274,260	
<b><u>Marcy Massena</u></b>									
	352 Structures & Improvements	40,268,127	24,810,486	-3%	(1,208,044)	16,665,685	45.02	370,184	0.92%
	353 Station Equipment	191,779,559	119,269,498	-3%	(5,753,387)	78,263,448	33.68	2,323,737	1.21%
	354 Towers & Fixtures	64,465,654	50,833,017	-100%	(64,465,654)	78,098,291	45.50	1,716,446	2.66%
	355 Poles & Fixtures	19,615,058	19,408,429	-100%	(19,615,058)	19,821,687	45.50	435,641	2.22%
	356 Overhead Conductors & Devices	42,480,940	22,408,371	-100%	(42,480,940)	62,553,509	45.50	1,374,802	3.24%
	359 Roads & Trails	5,105,433	2,656,781	0%	0	2,448,652	65.73	37,253	0.73%
	Total Marcy Massena	363,714,771	239,386,582		(133,523,083)	257,851,272		6,258,064	0
<b><u>Niagara</u></b>									
	352 Structures & Improvements	24,449,344	18,996,925	-3%	(733,480)	6,185,899	34.63	178,628	0.73%
	353 Station Equipment	93,379,948	58,467,755	-3%	(2,801,398)	37,713,591	30.49	1,236,917	1.32%

**NEW YORK POWER AUTHORITY**  
**COMPUTATION OF ANNUAL DEPRECIATION RATE**  
**At December 31, 2015**

Account	Account Description	Plant Balance at 12/31/2015 \$	Accumulated Depreciation at 12/31/2015 \$	Net Salvage %	Net Salvage Amount \$	Unaccrued Balance \$	Remaining Life Yrs	Annual Accrual \$	Annual Accrual %
354	Towers & Fixtures	18,743,984	20,389,300	-100%	(18,743,984)	17,098,668	27.50	621,770	3.32%
355	Poles & Fixtures	19,726	21,820	-100%	(19,726)	17,632	27.50	641	3.25%
356	Overhead Conductors & Devices	28,672,314	27,651,335	-100%	(28,672,314)	29,693,293	27.50	1,079,756	3.77%
359	Roads & Trails	42,797	37,021	0%	0	5,776	47.50	122	0.28%
	Total Niagara	165,308,113	125,564,156		(50,970,903)	90,714,860		3,117,834	

**St. Lawrence**

352	Structures & Improvements	12,343,417	7,375,543	-3%	(370,303)	5,338,177	44.82	119,103	0.96%
353	Station Equipment	137,716,425	76,137,078	-3%	(4,131,493)	65,710,840	37.50	1,752,289	1.27%
354	Towers & Fixtures	15,185,237	13,176,151	-100%	(15,185,237)	17,194,323	24.47	702,670	4.63%
355	Poles & Fixtures	6,427,665	7,114,376	-100%	(6,427,665)	5,740,954	24.50	234,325	3.65%
356	Overhead Conductors & Devices	15,472,585	13,746,685	-100%	(15,472,585)	17,198,485	24.47	702,840	4.54%
357	Underground Conduit	61,047	61,829	-5%	(3,052)	2,270	20.55	110	0.18%
358	Underground Conductors & Devices	1,186,661	1,211,718	-5%	(59,333)	34,276	6.97	4,918	0.41%
359	Roads & Trails	193,299	125,489	0%	0	67,810	63.39	1,070	0.55%
	Total St. Lawrence	188,586,336	118,948,869		(41,649,668)	111,287,135		3,517,323	

**GENERAL PLANT****Blenheim Gilboa**

390	Structures and Improvements	30,224,468	6,357,766	0.00%	0	23,866,702	42.66	559,463	1.85%
392	Transportation Equipment	5,338,747	3,570,034	0.00%	0	1,768,713	3.59	492,678	9.23%
393	Stores Equipment	379,493	282,334	0.00%	0	97,159	7.97	12,191	3.21%
394	Tools, Shop, and Garage Equipment	1,809,969	792,785	0.00%	0	1,017,184	15.31	66,439	3.67%
395	Laboratory Equipment	819,371	580,245	0.00%	0	239,126	12.69	18,844	2.30%
396	Power Operated Equipment	2,497,644	1,436,323	0.00%	0	1,061,321	5.88	180,497	7.23%
398	Miscellaneous Equipment	1,896,665	909,254	0.00%	0	987,411	14.18	69,634	3.67%
	Total Blenheim Gilboa	42,966,357	13,928,741		0	29,037,616		1,399,745	

**Headquarters**

390	Structures and Improvements	74,177,492	40,828,462	0.00%	0	33,349,030	29.34	1,136,559	1.53%
392	Transportation Equipment	11,806,296	10,311,596	0.00%	0	1,494,700	1.95	765,188	6.48%
394	Tools, Shop, and Garage Equipment	766,953	382,023	0.00%	0	384,930	17.41	22,110	2.88%
395	Laboratory Equipment	2,961,576	676,331	0.00%	0	2,285,245	16.00	142,828	4.82%
398	Miscellaneous Equipment	22,316,280	22,309,254	0.00%	0	7,026	17.75	396	0.002%
	Total Headquarters	112,028,597	74,507,666		0	37,520,931		2,067,080	

**NEW YORK POWER AUTHORITY**  
**COMPUTATION OF ANNUAL DEPRECIATION RATE**  
**At December 31, 2015**

Account	Account Description	Plant Balance at 12/31/2015 \$	Accumulated Depreciation at 12/31/2015 \$	Net Salvage %	Net Salvage Amount \$	Unaccrued Balance \$	Remaining Life Yrs	Annual Accrual \$	Annual Accrual %
<b><u>Marcy South</u></b>									
	396 Power Operated Equipment	763	763	0.00%	0	0	0.00	0	0.00%
<b><u>Massena Marcy</u></b>									
	390 Structures and Improvements	2,602,692	625,405	0.00%	0	1,977,287	46.89	42,169	1.62%
	392 Transportation Equipment	6,522,896	4,705,072	0.00%	0	1,817,824	3.22	564,542	8.65%
	393 Stores Equipment	129,292	99,486	0.00%	0	29,806	6.92	4,307	3.33%
	394 Tools, Shop, and Garage Equipment	742,377	628,104	0.00%	0	114,273	12.86	8,886	1.20%
	395 Laboratory Equipment	959,056	735,264	0.00%	0	223,792	15.32	14,608	1.52%
	396 Power Operated Equipment	3,739,914	2,995,882	0.00%	0	744,032	4.14	179,718	4.81%
	398 Miscellaneous Equipment	991,162	988,529	0.00%	0	2,633	12.44	212	0.02%
	Total Marcy Massena	15,687,389	10,777,742		0	4,909,647		814,441	
<b><u>Niagara</u></b>									
	390 Structures and Improvements	29,145,371	18,971,222	0.00%	0	10,174,149	26.02	391,013	1.34%
	392 Transportation Equipment	8,453,942	7,171,957	0.00%	0	1,281,985	2.13	601,871	7.12%
	393 Stores Equipment	315,500	315,500	0.00%	0	0		0	0.00%
	394 Tools, Shop, and Garage Equipment	5,171,828	4,254,860	0.00%	0	916,968	4.28	214,245	4.14%
	395 Laboratory Equipment	1,722,115	1,279,878	0.00%	0	442,237	16.33	27,081	1.57%
	396 Power Operated Equipment	4,288,696	2,713,245	0.00%	0	1,575,451	5.64	279,335	6.51%
	398 Miscellaneous Equipment	7,415,152	6,375,110	0.00%	0	1,040,042	16.30	63,806	0.86%
	Total Niagara	56,512,604	41,081,772		0	15,430,832	71	1,577,351	0
<b><u>St. Lawrence</u></b>									
	390 Structures and Improvements	20,710,197	6,119,635	0.00%	0	14,590,562	38.71	376,920	1.82%
	392 Transportation Equipment	12,984,613	9,767,999	0.00%	0	3,216,614	2.52	1,276,434	9.83%
	393 Stores Equipment	317,287	201,984	0.00%	0	115,303	13.70	8,416	2.65%
	394 Tools, Shop, and Garage Equipment	6,073,189	3,483,669	0.00%	0	2,589,520	6.61	391,758	6.45%
	395 Laboratory Equipment	2,119,586	1,036,734	0.00%	0	1,082,852	9.33	116,061	5.48%
	396 Power Operated Equipment	5,159,241	3,525,965	0.00%	0	1,633,276	5.79	282,086	5.47%
	398 Miscellaneous Equipment	16,718,022	9,596,366	0.00%	0	7,121,656	3.86	1,844,989	11.04%
	Total St. Lawrence	64,082,135	33,732,352		0	30,349,783		4,296,664	

**NEW YORK POWER AUTHORITY  
COMPUTATION OF ANNUAL AMORTIZATION RATE  
At December 31, 2015**

Acct	Description	Plant Balance 12/31/2015 \$	Allocated Reserve 12/31/2015 \$	Theoretical Reserve 12/31/2015 \$	Reserve Difference \$	Remaining Life Yrs	Amortize Reserve Difference \$	Assets To Retire \$
<b><u>Blenheim Gilboa</u></b>								
	391 Office Furniture and Equipment	571,180	560,083	558,887	1,196	3.20	(374)	532,782
	391.2 Computer Equipment 5 yr	406,469	313,059	321,455	(8,396)	3.25	2,583	275,487
	391.3 Computer Equip 10 Yr	559,078	555,764	429,174	126,590	5.50	(23,016)	322,888
	397 Communication Equipment	1,602,747	1,596,964	1,596,730	234	12.89	(18)	1,595,744
	399 Other Tangible Property	1,487	1,487	1,487	0	0.00	0	1,487
	Total Amortized	3,140,961	3,027,357	2,907,733	119,624		(20,825)	2,728,388
<b><u>Headquarters</u></b>								
	391 Office Furniture and Equipment	68,951,583	61,275,911	60,931,008	344,903	7.70	(44,793)	58,534,221
	391.2 Computer Equipment 5 yr	60,009,638	50,486,895	51,533,506	(1,046,611)	2.70	387,634	44,311,504
	391.3 Computer Equip 10 Yr	77,115,156	58,916,753	49,292,945	9,623,808	5.56	(1,730,901)	27,043,049
	397 Communication Equipment	11,654,475	11,275,390	11,197,129	78,261	12.39	(6,316)	11,100,777
	Total Amortized	217,730,852	181,954,949	172,954,588	9,000,361		(1,394,376)	140,989,551
<b><u>Marcy South</u></b>								
	397 Marcy South	1,170,741	1,170,741	1,170,741	0	0.00	0	1,170,741
<b><u>Massena Marcy</u></b>								
	391 Office Furniture and Equipment	1,675,166	1,653,952	1,652,540	1,412	5.49	(257)	1,633,985
	391.2 Computer Equipment 5 yr	3,310,376	3,142,309	3,234,003	(91,694)	1.07	85,695	2,953,574
	391.3 Computer Equip 10 Yr	7,076,398	5,532,000	5,162,522	369,478	8.65	(42,714)	4,863,140
	397 Communication Equipment	2,611,416	2,557,412	2,553,659	3,753	7.64	(491)	2,498,042
	Total Amortized	14,673,356	12,885,673	12,602,724	282,949		42,233	11,948,741
<b><u>Niagara</u></b>								
	391 Office Furniture and Equipment	2,279,602	2,275,179	2,270,762	4,417	5.93	(745)	2,264,707
	391.2 Computer Equipment 5 yr	957,877	805,978	824,175	(18,197)	3.26	5,582	752,897
	391.3 Computer Equip 10 Yr	324,070	324,070	324,070	0	0.00	0	324,070
	397 Communication Equipment	4,710,305	3,848,746	3,925,408	(76,662)	10.28	7,457	3,565,543
	399 Other Tangible Property	3,201,209	1,676,225	3,201,209	(1,524,984)	5.00	304,997	0
	Total Amortized	11,473,063	8,930,198	10,545,624	(1,615,426)		317,291	6,907,217

**NEW YORK POWER AUTHORITY**  
**COMPUTATION OF ANNUAL AMORTIZATION RATE**  
**At December 31, 2015**

Acct	Description	Plant Balance 12/31/2015 \$	Allocated Reserve 12/31/2015 \$	Theoretical Reserve 12/31/2015 \$	Reserve Difference \$	Remaining Life Yrs	Amortize Reserve Difference \$	Assets To Retire \$
<b><u>St. Lawrence</u></b>								
	391 Office Furniture and Equipment	1,387,166	1,373,186	1,383,295	(10,109)	1.61	6,279	1,363,116
	391.2 Computer Equipment 5 yr	1,147,463	974,368	1,040,425	(66,057)	2.27	29,100	911,639
	391.3 Computer Equip 10 Yr	7,081,808	1,493,898	982,400	511,498	8.61	(59,407)	0
	397 Communication Equipment	6,407,338	3,887,320	4,971,650	(1,084,330)	3.95	274,514	949,580
	399 Other Tangible Property	1,126,419	255,323	1,126,419	(871,096)	5.00	174,219	0
	Total Amortized	17,150,194	7,984,095	9,504,189	(1,520,094)		424,705	3,224,335

**NYPA- ELECTRIC AMORTIZED GENERAL PLANT  
COMPUTATION OF ANNUAL AMORTIZATION RATE  
At December 31, 2015**

Acct	Description	Plant Balance 12/31/15 \$	Allocated Reserve 12/31/15 \$	Amortization Life Yrs	Amortization Net Salv % %	Amortization Rate %	Annual Amortization \$	Accrual For Reserve Difference \$
<b>AFTER RETIREMENT OF FULLY ACCRUED ASSETS</b>								
<b><u>Blenheim Gilboa</u></b>								
391	Office Furniture and Equipment	38,398	27,301	10	0.00%	10.00%	3,840	(374)
391.2	Computer Equipment 5 yr	130,982	37,572	5	0.00%	20.00%	26,196	2,587
391.3	Computer Equip 10 Yr	236,190	232,876	10	0.00%	10.00%	23,619	(23,016)
397	Communication Equipment	7,003	1,220	15	0.00%	6.67%	467	(18)
399	Other Tangible Property	0	0	15	0.00%	6.67%	0	0
	Total Amortized	412,573	298,969				54,122	(20,821)
<b><u>Headquarters</u></b>								
391	Office Furniture and Equipment	10,417,362	2,741,690	10	0.00%	10.00%	1,041,736	(44,797)
391.2	Computer Equipment 5 yr	15,698,134	6,175,391	5	0.00%	20.00%	3,139,627	387,673
391.3	Computer Equip 10 Yr	50,072,107	31,873,704	10	0.00%	10.00%	5,007,211	(1,732,013)
397	Communication Equipment	553,697	174,612	15	0.00%	6.67%	36,913	(6,317)
	Total Amortized	76,741,301	40,965,398				9,225,487	(1,395,454)
<b><u>Marcy South</u></b>								
397	Marcy South	0	0	15	0.00%	6.67%	0	0
<b><u>Massena Marcy</u></b>								
391	Office Furniture and Equipment	41,182	19,968	10	0.00%	10.00%	4,118	(257)
391.2	Computer Equipment 5 yr	356,802	188,735	5	0.00%	20.00%	71,360	85,676
391.3	Computer Equip 10 Yr	2,213,258	668,860	10	0.00%	10.00%	221,326	(42,727)
397	Communication Equipment	113,375	59,371	15	0.00%	6.67%	7,558	(491)
	Total Amortized	2,724,616	936,933				304,363	42,201
<b><u>Niagara</u></b>								
391	Office Furniture and Equipment	14,895	10,472	10	0.00%	10.00%	1,489	(744)
391.2	Computer Equipment 5 yr	204,980	53,080	5	0.00%	20.00%	40,996	5,580
391.3	Computer Equip 10 Yr	0	0	10	0.00%	10.00%	0	0
397	Communication Equipment	1,144,762	283,203	15	0.00%	6.67%	76,317	7,454
399	Other Tangible Property	3,201,209	1,676,225	15	0.00%	6.67%	213,414	304,997
	Total Amortized	4,565,846	2,022,980				332,217	317,286

**NYPA- ELECTRIC AMORTIZED GENERAL PLANT  
COMPUTATION OF ANNUAL AMORTIZATION RATE  
At December 31, 2015**

Acct	Description	Plant Balance 12/31/15 \$	Allocated Reserve 12/31/15 \$	Amortization Life Yrs	Amortization Net Salv % %	Amortization Rate %	Annual Amortization \$	Accrual For Reserve Difference \$
<b><u>St. Lawrence</u></b>								
391	Office Furniture and Equipment	24,050	10,070	10	0.00%	10.00%	2,405	6,280
391.2	Computer Equipment 5 yr	235,825	62,730	5	0.00%	20.00%	47,165	29,107
391.3	Computer Equip 10 Yr	7,081,808	1,493,898	10	0.00%	10.00%	708,181	(59,388)
397	Communication Equipment	5,457,758	2,937,740	15	0.00%	6.67%	363,851	274,805
399	Other Tangible Property	1,126,419	255,323	15	0.00%	6.67%	75,095	174,219
	Total Amortized	13,925,860	4,759,761				1,196,696	425,022



**APPENDIX B**  
**Comparison of Depreciation Accrual**

**NEW YORK POWER AUTHORITY  
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES  
AT DECEMBER 31, 2015**

Account	Account Description	Plant Balance at 12/31/2015 \$	2015 Surviving Balance Annual Accrual Amount \$	Proposed Accrual Rate %	Proposed Accrual Amount \$	Difference \$
<b>TRANSMISSION</b>						
<b><u>Blenheim Gilboa</u></b>						
	352 Structures & Improvements	4,317,717	77,474	0.65%	27,938	(49,536)
	353 Station Equipment	51,222,730	864,993	1.57%	803,987	(61,006)
	354 Towers & Fixtures	22,612,274	483,926	2.49%	562,919	78,993
	355 Poles & Fixtures	1,953,118	50,180	2.07%	40,493	(9,687)
	356 Overhead Conductors & Devices	9,403,929	201,233	2.46%	231,636	30,403
	359 Roads & Trails	670,808	8,113	0.64%	4,296	(3,817)
	Total Blenheim Gilboa	90,180,576	1,685,919		1,671,269	(14,650)
<b><u>J. A. FitzPatrick *</u></b>						
	354 Towers & Fixtures	10,051,183	0	1.95%	195,615	195,615
	356 Overhead Conductors & Devices	5,926,677	-1	2.23%	132,302	132,303
	359 Roads & Trails	80,335	0	0.13%	108	108
	Total J. A. Fitzpatrick	16,058,195	-1		328,025	328,026
* There is no 2015 accrual since assets in J.A. FitzPatrick were fully accrued in last depreciation study						
<b><u>Marcy South</u></b>						
	353 Station Equipment	23,088,723	524,109	1.29%	298,768	(225,341)
	354 Towers & Fixtures	75,439,776	1,621,961	2.71%	2,040,834	418,873
	355 Poles & Fixtures	210,096,383	5,405,407	2.43%	5,115,401	(290,006)
	356 Overhead Conductors & Devices	105,799,660	2,285,265	2.69%	2,845,218	559,953
	357 Underground Conduit	43,951,419	615,321	1.23%	542,354	(72,967)
	358 Underground Conductors & Devices	12,314,493	279,540	1.86%	229,581	(49,959)
	359 Roads & Trails	22,421,909	224,220	0.90%	202,137	(22,083)
	Total Marcy South	493,112,363	10,955,823		11,274,292	318,469
<b><u>Marcy Massena</u></b>						
	352 Structures & Improvements	40,268,127	717,623	0.92%	370,188	(347,435)
	353 Station Equipment	191,779,559	3,516,913	1.21%	2,323,860	(1,193,053)
	354 Towers & Fixtures	64,465,654	1,373,119	2.66%	1,716,446	343,327
	355 Poles & Fixtures	19,615,058	504,107	2.22%	435,641	(68,466)

**NEW YORK POWER AUTHORITY  
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES  
AT DECEMBER 31, 2015**

<b>Account</b>	<b>Account Description</b>	<b>Plant Balance at 12/31/2015 \$</b>	<b>2015 Surviving Balance Annual Accrual Amount \$</b>	<b>Proposed Accrual Rate %</b>	<b>Proposed Accrual Amount \$</b>	<b>Difference \$</b>
	356 Overhead Conductors & Devices	42,480,940	904,835	3.24%	1,374,802	469,967
	359 Roads & Trails	5,105,433	51,055	0.73%	37,255	(13,800)
	Total Marcy Massena	363,714,771	7,067,652		6,258,193	(809,459)
<b><u>Niagara</u></b>						
	352 Structures & Improvements	24,449,344	422,977	0.73%	178,618	(244,359)
	353 Station Equipment	93,379,948	1,576,809	1.32%	1,236,826	(339,983)
	354 Towers & Fixtures	18,743,984	188,081	3.32%	621,770	433,689
	355 Poles & Fixtures	19,726	224	3.25%	641	417
	356 Overhead Conductors & Devices	28,672,314	659,740	3.77%	1,079,756	420,016
	359 Roads & Trails	42,797	533	0.28%	122	(411)
	Total Niagara	165,308,113	2,848,364		3,117,733	269,368
<b><u>St. Lawrence</u></b>						
	352 Structures & Improvements	12,343,417	233,977	0.96%	119,106	(114,871)
	353 Station Equipment	137,716,425	3,429,096	1.27%	1,752,454	(1,676,642)
	354 Towers & Fixtures	15,185,237	350,788	4.63%	702,672	351,885
	355 Poles & Fixtures	6,427,665	52,824	3.65%	234,325	181,501
	356 Overhead Conductors & Devices	15,472,585	345,040	4.54%	702,921	357,881
	357 Underground Conduit	61,047	60	0.18%	110	50
	358 Underground Conductors & Devices	1,186,661	27,778	0.41%	4,917	(22,861)
	359 Roads & Trails	193,299	3,037	0.55%	1,070	(1,967)
	Total St. Lawrence	188,586,336	4,442,599		3,517,576	(925,024)
<b>Total Transmission</b>						
		1,316,960,353	27,000,357		26,167,088	(833,269)

**GENERAL PLANT****Blenheim Gilboa**

390 Structures and Improvements	30,224,468	419,815	1.85%	559,464	139,648
392 Transportation Equipment	5,338,747	483,375	9.23%	492,846	9,470

**NEW YORK POWER AUTHORITY**  
**COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES**  
**AT DECEMBER 31, 2015**

<b>Account</b>	<b>Account Description</b>	<b>Plant Balance at 12/31/2015 \$</b>	<b>2015 Surviving Balance Annual Accrual Amount \$</b>	<b>Proposed Accrual Rate %</b>	<b>Proposed Accrual Amount \$</b>	<b>Difference \$</b>
	393 Stores Equipment	379,493	13,412	3.21%	12,185	(1,227)
	394 Tools, Shop, and Garage Equipment	1,809,969	63,058	3.67%	66,422	3,365
	395 Laboratory Equipment	819,371	11,526	2.30%	18,850	7,324
	396 Power Operated Equipment	2,497,644	187,949	7.23%	180,512	(7,437)
	398 Miscellaneous Equipment	1,896,665	84,210	3.67%	69,617	(14,593)
<b><u>Headquarters</u></b>						
	390 Structures and Improvements	74,177,492	2,118,744	1.53%	1,136,559	(982,185)
	392 Transportation Equipment	11,806,296	902,082	6.48%	765,188	(136,894)
	394 Tools, Shop, and Garage Equipment	766,953	43,664	2.88%	22,104	(21,560)
	395 Laboratory Equipment	2,961,576	270,673	4.82%	142,839	(127,834)
	398 Miscellaneous Equipment Note (2)	22,316,280	538,556	0.002%	396	(538,160)
<b><u>Marcy South</u></b>						
	396 Power Operated Equipment	763	0	Note (1)	0	0
<b><u>Massena Marcy</u></b>						
	390 Structures and Improvements	2,602,692	207,384	1.62%	42,168	(165,216)
	392 Transportation Equipment	6,522,896	640,162	8.65%	564,204	(75,958)
	393 Stores Equipment	129,292	4,220	3.33%	4,306	86
	394 Tools, Shop, and Garage Equipment	742,377	11,924	1.20%	8,888	(3,036)
	395 Laboratory Equipment	959,056	31,501	1.52%	14,605	(16,896)
	396 Power Operated Equipment	3,739,914	263,180	4.81%	179,718	(83,462)
	398 Miscellaneous Equipment	991,162	991	0.02%	212	(779)
<b><u>Niagara</u></b>						
	390 Structures and Improvements	29,145,371	885,931	1.34%	390,987	(494,943)
	392 Transportation Equipment	8,453,942	478,980	7.12%	601,871	122,891
	393 Stores Equipment	315,500	2,195	Note (1)		(2,195)
	394 Tools, Shop, and Garage Equipment	5,171,828	175,632	4.14%	214,178	38,546
	395 Laboratory Equipment	1,722,115	48,456	1.57%	27,089	(21,367)
	396 Power Operated Equipment	4,288,696	338,571	6.51%	279,335	(59,236)

**NEW YORK POWER AUTHORITY  
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES  
AT DECEMBER 31, 2015**

Account	Account Description	Plant Balance at 12/31/2015 \$	2015 Surviving Balance Annual Accrual Amount \$	Proposed Accrual Rate %	Proposed Accrual Amount \$	Difference \$
	398 Miscellaneous Equipment	7,415,152	54,551	0.86%	63,800	9,249
<b><u>St. Lawrence</u></b>						
	390 Structures and Improvements	20,710,197	632,194	1.82%	376,935	(255,259)
	392 Transportation Equipment	12,984,613	857,668	9.83%	1,276,434	418,766
	393 Stores Equipment	317,287	7,332	2.65%	8,417	1,085
	394 Tools, Shop, and Garage Equipment	6,073,189	221,237	6.45%	391,682	170,445
	395 Laboratory Equipment	2,119,586	67,181	5.48%	116,119	48,938
	396 Power Operated Equipment	5,159,241	402,714	5.47%	282,161	(120,553)
	398 Miscellaneous Equipment	16,718,022	610,843	11.04%	1,845,607	1,234,763
Note 1: Fully accrued. If plant is added to Marcy South Account 396, the recommended accrual rate is				8.33%		
If plant is added to Niagara Account 393, the recommended accrual rate is				3.33%		
Note 2: Nearly Fully accrued. If new plant is added to 398 Headquarters, the recommended				5.00%		
Accrual rate is						
<b>Amortized Accounts after Retirement of Fully Accrued Assets</b>						
<b><u>Blenheim Gilboa</u></b>						
	391 Office Furniture and Equipment	38,398	3,842	10.00%	3,840	(2)
	391.2 Computer Equipment 5 yr	130,982	16,129	20.00%	26,196	10,068
	391.3 Computer Equip 10 Yr	236,190	47,238	10.00%	23,619	(23,619)
	397 Communication Equipment	7,003	467	6.67%	467	(0)
	399 Other Tangible Property	0	0	6.67%	0	0
<b><u>Headquarters</u></b>						
	391 Office Furniture and Equipment	10,417,362	1,145,708	10.00%	1,041,736	(103,971)
	391.2 Computer Equipment 5 yr	15,698,134	2,144,897	20.00%	3,139,627	994,730
	391.3 Computer Equip 10 Yr	50,072,107	7,778,625	10.00%	5,007,211	(2,771,414)
	397 Communication Equipment	553,697	56,554	6.67%	36,913	(19,641)
<b><u>Marcy South</u></b>						
	397 Marcy South	0	0	6.67%	0	0

**NEW YORK POWER AUTHORITY**  
**COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES**  
**AT DECEMBER 31, 2015**

<b>Account</b>	<b>Account Description</b>	<b>Plant Balance at 12/31/2015 \$</b>	<b>2015 Surviving Balance Annual Accrual Amount \$</b>	<b>Proposed Accrual Rate %</b>	<b>Proposed Accrual Amount \$</b>	<b>Difference \$</b>
<b><u>Massena Marcy</u></b>						
	391 Office Furniture and Equipment	41,182	3,812	10.00%	4,118	306
	391.2 Computer Equipment 5 yr	356,802	37,412	20.00%	71,360	33,948
	391.3 Computer Equip 10 Yr	2,213,258	297,532	10.00%	221,326	(76,207)
	397 Communication Equipment	113,375	7,560	6.67%	7,558	(2)
<b><u>Niagara</u></b>						
	391 Office Furniture and Equipment	14,895	2,643	10.00%	1,489	(1,154)
	391.2 Computer Equipment 5 yr	204,980	18,695	20.00%	40,996	22,301
	391.3 Computer Equip 10 Yr	0	0	10.00%	0	0
	397 Communication Equipment	1,144,762	59,558	6.67%	76,317	16,759
	399 Other Tangible Property	3,201,209	42,683	6.67%	213,414	170,731
<b><u>St. Lawrence</u></b>						
	391 Office Furniture and Equipment	24,050	1,109	10.00%	2,405	1,296
	391.2 Computer Equipment 5 yr	235,825	13,509	20.00%	47,165	33,656
	391.3 Computer Equip 10 Yr	7,081,808	1,389,179	10.00%	708,181	(680,998)
	397 Communication Equipment	5,457,758	257,196	6.67%	363,851	106,655
	399 Other Tangible Property	1,126,419	15,019	6.67%	75,095	60,076
	Accrual for Reserve Imbalance				(631,766)	(631,766)
	Total General	389,648,042	24,419,280		20,636,816	(3,782,464)
	Total NYPA	1,706,608,395	51,419,637		46,803,904	(4,615,733)

**APPENDIX C**  
**Proposed Depreciation Parameters**

**New York Power Authority**  
**Comparison of Existing and Proposed Depreciation Parameters**  
**At December 31, 2015**

Acct	Description	Existing			Proposed		
		Life	Curve	Net Salvage	Life	Curve	Net Salvage
352	Structures & Improvements	75	R5	-25%	75	R5	-3%
353	Station Equipment	50	R5	-15%	60	R5	-3%
354	Towers & Fixtures	65	R5	-40%	80	SQ	-100%
355	Poles & Fixtures	55	R4	-40%	80	SQ	-100%
356	Overhead Conductors & Devices	55	R5	-20%	80	SQ	-100%
357	Underground Conduit	75	R5	-5%	75	R5	-5%
358	Underground Conductors & Devices	50	R5	-15%	50	R5	-5%
359	Roads & Trails	100	SQ	0%	100	SQ	0%
390	Structures and Improvements	50	R3	0%	50	R3	0%
391	Office Furniture and Equipment	30	S2	5%	10	SQ	0%
391.2	Computer Equipment	30	S2	5%	5	SQ	0%
391.3	Computer Equipment 10 Year	30	S2	5%	10	SQ	0%
392	Transportation Equipment	10	L2	5%	7	L2	0%
393	Stores Equipment	30	R2.5	0%	30	SQ	0%
394	Tools, Shop, and Garage Equipment	20	R1.5	0%	20	SQ	0%
395	Laboratory Equipment	25	S3	0%	20	SQ	0%
396	Power Operated Equipment	10	L3	5%	12	S2.5	0%
397	Communication Equipment	15	S3	0%	15	SQ	0%
398	Miscellaneous Equipment	25	S2	0%	20	SQ	0%
399	Other Tangible Property	15	SQ	0%	15	SQ	0%



**New York Power Authority**  
**Comparison of Existing and Proposed Depreciation Parameters**  
**At December 31, 2015**

<b>Transmission Line</b>	<b>Existing</b>		<b>Proposed</b>	
	<b>Retirement Date</b>		<b>Retirement Date</b>	
	<b>In Service Yr</b>	<b>Ret Yr</b>	<b>In Service Yr</b>	<b>Ret Yr</b>
Massena- Marcy Project	1981	NA	1981	2061
Marcy-South Project	1988	NA	1988	2068
St Lawrence/FDR Project	1960	2043	1960	2040
Niagara Project	1963	2047	1963	2043
Blenheim-Gilboa Project	1981	2059	1981	2061
J A FitzPatrick Project	1975	2014	1975	2055

**Excluded Projects:**

Indian Point No. 3 Nuclear Power Project  
Charles Poletti Power Project  
Long Island Sound Cable Project

**APPENDIX D**  
**Net Salvage Analysis**

Asset Class	FERC	FERC Description	%	Estimated Project Cost	Estimated Retirement	Estimated Dismantling	Estimated Net Salv% (1)	Current Net Salv%
TRANS52S	352	Structures & Improvements	7%	15,975,177	1,323,910			-25
TRANS53S	353	Station Equipment	74%	178,236,240	18,951,701	600,000	-2.96%	-15
TRANS54S	354	Towers & Fixtures	8%	19,653,135	1,608,276			-40
TRANS55S	355	Poles & Fixtures	3%	8,318,854	616,211			-40
TRANS56S	356	Overhead Conductors & Devices	8%	20,025,029	1,944,768	32,000,000	-767.52%	-20
			<b>100%</b>	<b>242,208,434.8</b>	<b>24,444,866</b>	<b>32,600,000</b>		
	357	Underground Conduit						-5
	358	Underground Conductors & Devices						-15

(1) Estimated Net Salvage calculated separately for 352/353 and 354/355/356.