

1 **UNDERTAKING JT3.9**

2

3 **Undertaking**

4

5 To go through the report and identify anything that is not Mr. Gould's work.

6

7

8 **Response**

9

10 The response to this undertaking was provided on Day 2 of the Technical Conference, at

11 Technical Conference transcript, July 9, 2014, page 3, lines 11-27, as follows:

12

13 "MR. GOULD: So, yes, in response to Undertaking JT3.9 I went back -- I wanted to

14 make sure that I was being fully accurate, so I went back through the report, and Mr.

15 Shepherd identified two graphics that were created by OPG. Those are correctly

16 identified as OPG's work product.

17 There is also a chart that we have looked at multiple times in this hearing that's

18 on page 16, and you will see in that table that refers to the campus plan budget -- it's

19 under paragraph B, "overall cost impact" -- you will see that the footnote refers to the

20 fact that these numbers are current forecast amounts provided by the DR team.

21 So that, like every other number that would be within this document, would be

22 sourced from the project, but in terms of your question, Mr. Shepherd, I can state for the

23 record that that is the only thing -- those are the only elements within this report or any of

24 our reports consistently through that would have been provided by OPG."