AMPCO Interrogatory #102

Interrogatory

Reference: Ex D2 T2 S10 P45

OPG decided to undertake the D2O Storage Project on an Engineer, Procure, and Construct ("EPC") basis within the ESMSA framework. This approach was chosen to enable OPG to gain operational experience with both EPC contracting and the ESMSA framework on a large and complex project prior to starting unit refurbishment. The D2O Storage Project was OPG's first large and complex EPC project to be executed under the ESMSA.

a) Did OPG apply the same mandatory criteria as the RFP issued in late 2011? If not, why not?

b) Please provide the criteria used to evaluate the proposals of ES Fox and B&M.

c) Please identify any criteria that could not be met by ES Fox or B&M.

Response

a) No because they were not applicable. The cancelled RFP was for engineering services only. The work request was for an EPC contractor.

b) – c)

Criteria used to evaluate the ES Fox and B&M proposals for award of the EPC contract for the D2O Storage Project under the ESMSA framework were: (i) technical expertise; risk management and schedule; overall quality of the proposal, and; pricing. There were no criteria that could not be met by either of ES Fox or B&M.