Energy Probe Interrogatory #37

Interrogatory

Reference:
Exhibit D2, Tab 2, Schedule 11, page 2

Preamble: "In September 2019, Bates White Economic Consulting ("Bates White") was retained to complete an estimate of the cost to design, engineer, construct and commission the as-built Heavy Water Storage and Drum Handling Facility ("D2O Storage Project") at OPG's Darlington Nuclear Generating Station taking into consideration:…"

a) Please confirm that D2O Storage Project was completed when Bates White was hired.

b) Why did OPG authorize Torys LLP to hire Bates White to complete a cost estimate of the D2O Storage Project after the project was completed.?

c) What was the actual cost of the D2O Storage Project in September 2019?

d) Was Bates White provided information about the actual cost of the D2O Storage Project?

e) Did Bates White make any site visits to the D2O Storage Project and take any measurements?

Response

a) Not confirmed. Bates White was retained in September 2019 and the facility was declared capable of accepting heavy water in March 2020.

b) See part a).

c) The life to date cost of the D2O Storage Project in September 2019 was $496.4M.

d) See Ex. L-D2-02-CCC-033 part a).

e) As stated in Ex. D2-2-11, Attachment 3, p. 17, the Bates White team members toured the D2O Storage Project in October 2019 and were able to observe and experience the project site and physical layout first-hand. Bates White did not take measurements.