CCC Interrogatory #34

Interrogatory

Reference: Exhibit D2/T2/S 11/ Attachment 3, pp. 5, 44

This report presents our cost estimate for the engineering design, procurement, construction, and commissioning of the D2O Storage Project, as it would have been calculated before construction began. The cost estimate assumes what might be called "perfect knowledge" with respect to project scope, design requirements, and actual site conditions encountered. The estimate comprises the cost to pay a construction contractor to engineer, procure, and construct ("EPC") the D2O Storage Project, and OPG's in-house cost ("owner's cost") for contract administration, procurement support, and engineering oversight and approval through project turnover, commissioning, and contract close-out, but does not include any costs associated with post-commissioning operations and maintenance ("O&M").

a) Please confirm that Bates White Economic Consulting was provided with full details of OPG's actual costs to bring the D20 Storage Project into service and a full description of the issues experienced by OPG during the course of bringing the D20 Storage Project into service as a result of having received the 507 documents listed at Appendix B of its study prior to Bates White Economic Consulting developing its own cost estimate.
b) Please confirm that Bates White Economic Consulting was not asked to and did not consider alternatives to the D20 Storage Project in order to determine whether there were alternatives that, in light of Bates Economic Consulting's cost estimate of the D20 Storage Project, may have been preferable.

Response

a) – b)

This question duplicates Ex. L-D2-02-CCC-033 a) and b). See OPG's response there.