CCC Interrogatory #37

Interrogatory

Reference: Exhibit D2/T2/S 10/ p. 79

The increased weighting of technical merit in this work request, as compared to the first work request issued in 2012, reflected the fact that as design, engineering and construction progressed, the project's complexity was better understood. As a result, OPG assigned greater weight to the technical aspects of the work request.

a) Please explain why it would not be the case that the less a project's complexity was understood by OPG, the more important the technical aspects in a work request would be.

Response

As discussed extensively throughout Ex. D2-2-10, the project's complexity became more apparent as the design progressed and the various construction challenges detailed in the evidence emerged. By the time of the second work request under the ESMSA, OPG had been overseeing the project for more than two years and experienced first-hand the challenges in designing the D2O Storage Project facility, integrating it with the HWMB/TRF and constructing it. Based on this experience, OPG determined to adjust the technical factor/price weighting from 50/50 to 75/25.