Energy Probe Interrogatory #40

Interrogatory

Reference:
Exhibit D2, Tab 2, Schedule 11, Attachment 1, pages 6, 7 and 15

Has the risk that the Darlington Refurbishment Program will not be completed on schedule or on budget increased, stayed the same or decreased from the time of the previous review by Pegasus-Global in 2016? Please explain your answer.

Response

This response was prepared by Pegasus-Global Holdings Inc. ("Pegasus-Global"):

An assessment of individual risks, such as the risks with potential cost and/or schedule impacts, was not part of Pegasus-Global's scope in either its EB-2016-0152 Unit 2 or its current assessment. However, as discussed in each assessment, OPG has developed and implemented a robust set of policies, procedures, and tools that will continue to assist in the execution of the Program. Additionally, in the current assessment, it was identified that the cost and schedule estimates for the Remaining Units have gone through thorough reviews by OPG and its partners, including incorporation of actual performance and lessons learned from the Unit 2 execution, that reduces the uncertainty that existed at the onset of the Program and provides confidence in OPG successfully completing the Program.