Board Staff Interrogatory #166

Interrogatory

Reference: Exhibit D2 / Tab 2 / Schedule 11 / Attachment 3

a) Please advise whether Bates White Economic Consulting (Bates White) has ever completed a cost estimate of a similar nature to the one filed in the current proceeding (i.e. estimating the cost of a project after it has been completed assuming "perfect knowledge"). If so, please provide references to those studies and advise if those studies were ever filed for regulatory / legal purposes.

Response

This response was prepared by Bates White:

a) Yes. Members of the Bates White team have performed cost estimates of a similar or analogous nature in a variety of contexts, including in some instances for forensic purposes. These efforts include the following: the U.S. Department of Energy Low Activity Waste Pre-Treatment Facility at the Hanford Site; the U.S. Department of Energy Salt Waste Processing Facility at the Savannah River Site; the U.S. Department of Energy Low Activity Waste Pre-Treatment Facility at the Hanford Site; the South Texas Project Electric Generating Station units 1 and 2, in the context of a rate case and prudence review; the U.S. Department of Energy Yucca Mountain Repository Project, on behalf of the U.S. Department of Justice; the Desert Sunlight and Silver State South solar power projects, which are the subject of litigation in the U.S. Court of Federal Claims; the Olkiluoto 3 nuclear power plant in Finland, the subject of a confidential international arbitration proceeding; and the U.S. Army Corps of Engineers Olmstead Locks and Dam Refurbishment Project.