UNDERTAKING J2.3

Undertaking

TO DETERMINE IF WHAT WAS INCLUDED IN THE 5,000 METRES OF PIPE THAT WAS SPECIFIED IN THAT EARLIER BUSINESS CASE AND WHETHER THAT WAS THE ENTIRE AMOUNT OF PIPING IN THE FACILITY, OR A SUBSET OF PIPING; IF IN THIS UNDERTAKING OPG DETERMINES THAT THE 5,000 WAS A SUBSET OF PIPING, OPG WILL PROVIDE THAT SAME SUBSET IN THE FINAL BUILD

Response

The 2018 Superseding Release Execution BCS at Ex. D2-2-10, Attachment 2q, p. 3, states: “The actual design requires over 5km of piping (including all relocates, process and non-process piping)…” This is a reference to all piping in the facility, not a subset of piping.

The statement in OPG’s pre-filed evidence at Ex. D2-2-10, p. 85, line 11, regarding “…installation of almost 10,000 m of piping.” is similarly a reference to all piping installed in the facility and accurately reflects the total amount of piping (9,616 m as stated in the Bill of Quantities at Ex. J3.6, Attachment 1, p. A-1).

The length of piping in the facility did not in fact increase by almost 5km between 2018 and 2020. For example, the 2015 Superseding Release Execution BCS also referred to “over 5km of piping” (Ex. D2-2-10, Attachment 2p, p. 3). In both BCSs, the sentence is included in the section setting out major contributors to cost variances and is used to exemplify the growth in material requirements as a result of design evolution.