

BOARD STAFF - 01

Reference: Exhibit A / Tab 2 / Schedule 1 / page 3

Preamble: WPLP states that under its current project schedule, the Line to Pickle Lake is expected to come into service in August 2022. WPLP proposes that the OEB incorporate the associated revenue requirement for the Line to Pickle Lake into the updated UTRs for existing transmitters effective January 1, 2023.

Question(s):

- a) Please confirm when the Line to Pickle Lake comes into service. If the line does not come into service during the proceeding, please advise when it is expected to come into service.
-

Response:

- a) WPLP confirms that the Line to Pickle Lake went into service on August 12, 2022.

BOARD STAFF - 02

Reference: Exhibit A / Tab 4 / Schedule 1 / page 1
Exhibit A / Tab 5 / Schedule 2 / pages 2-3

Preamble: Based on the current project schedule, it is anticipated that the Pikangikum First Nation will be connected to WPLP's transmission system mid to late August 2022, at which point the Pikangikum distribution line will form part of the Transmission System that is the subject of WPLP's electricity transmission licence. Once this conversion takes place, WPLP intends to request cancellation of its electricity distribution licence.

Question(s):

- a) Please advise whether the Pikangikum First Nation has been connected to WPLP's Transmission System. If it has not been connected, please provide an updated schedule.

Response:

- a) The Pikangikum First Nation has not been connected to WPLP's Transmission System. As explained in WPLP's September 9, 2022 application to extend its electricity distribution licence (EB-2022-0244), conversion of the distribution line to form part of WPLP's Transmission System was rescheduled to September 4, 2022 as a result of third-party delays in establishing various telecommunication circuits. As further explained in EB-2022-0244, in the lead-up to the rescheduled conversion WPLP experienced complications in certain testing and commissioning activities between its Red Lake SS and Hydro One's Ear Falls TS as a result of issues outside of its control. These complications require changes to Hydro One's SCADA database that cannot be completed until October 2022. WPLP is therefore working towards converting the Pikangikum distribution line to form part of its Transmission System in October 2022. However, as the final stage in the conversion process requires an extended community outage, conversion may need to be deferred until the spring of 2023 to mitigate outage risk to the community during the winter months. On September 22, 2022, the OEB approved an extension of WPLP's distribution licence to June 30, 2023 in EB-2022-0244 so that the company continues to be appropriately authorized to own and operate the distribution system throughout this period.

BOARD STAFF - 03

Reference: Exhibit B / Tab 1 / Schedule 1 / page 10
Exhibit B / Tab 1 / Schedule 3 / page 6

Preamble: WPLP states that it has made certain routing refinements, primarily in five locations increasing the line length from 1736 km to 1744 km.

WPLP states the risk that further routing changes are required based on cultural or environmental sensitivities or constraints identified during ongoing engagement activities, or through field observations leading up to construction in each area has been significantly mitigated as most of the final routing has been determined and agreed to by the relevant stakeholders and First Nation communities. There only remain a couple of outstanding routing refinements, primarily around the 25kV and 44kV lines.

Question(s):

- a) Please provide a full list of routing changes that have been made.
- b) What has been the impact, if any, of the routing changes on the substations?
- c) Please clarify whether the routing changes outlined in a) have been made to address concerns raised by Indigenous communities, to address concerns raised by other stakeholders or to address construction related challenges.
- d) What is the total cost impact associated with the routing changes? Please provide a breakdown aligning with the list provided in a).
- e) Please provide detailed information of the outstanding routing refinements under consideration.
- f) Please provide any additional forecasted costs including use of contingency amounts for each of the outstanding line sections and stations.
- g) Please provide any expected impacts on energization dates for each of the outstanding line sections and stations.

Response:

- a) The table below identifies all executed routing changes that have been made between execution of the EPC contract (September 10, 2019) and September 30, 2022.

Route Change	Driver of Change	Cost Impact (\$ 000's)
Line-w54w-Route change PH1-275 (Km 280-285)	Community Driven	382
Line-JI-Route change Km 15-20	Community Driven	367
Line-VY-Route change PH2-R7 km 5-15	Community Driven	(449)
Line-G1-Route change PH2-PL5 - Substation G	Community Driven	0
Line-KM-Route change PH2-PL6 km 55-61	Community Driven	60
Line-EF-Route change PH2-PL9. Str. 152-261	Community Driven	17
Line-BC-Route change PH2-PL10 km 48-49	Community Driven	(125)
Line-QR-Route change PH2-RL14 - Berens River str. 1-9	Community Driven	(35)
Line-W54W-Route change PH1-102 km 102	Construction Driven	64
Line AB S 104	Construction Driven	0
Additional Land Required. Substation S expansion and ingress.	Construction Driven	0
Line AB- Route Change to avoid MTO quarry S215-233	Stakeholder Driven	147
Line KM route change PH2-PL13 S16-33	Community Driven	(411)
Sachigo Lake (Line EG) North - route change. Str 190-220	Community Driven	(1,471)
Line AB Route Change - S270	Construction Driven	0
Line AB S 392	Community Driven	0
Line AB S835	Construction Driven	0
Line BC 111-119	Construction Driven	(3)
Line CD - Route Change - S300-315 - Wabbit Trail	Construction Driven	(243)
Line-JI-Route Changes(S338-356)	Construction Driven	42
Substation M- Ingress changes.	Construction Driven	0
Line-JK-Route Change 45-59; 91-103; 233-234	Construction Driven	(265)
Line-RT-Route Change (km 38-42) - Critchell Lake	Community Driven	1,684
Line-RT-Route Change (km 28-32) - McInnes Lake	Community Driven	(533)
Line-KM-Route Change (Str 12-13)	Construction Driven	0
Line-TU-Route Change (Structure 31-32)	Construction Driven	0
Line-AB-Route Change (Str 247-251)	Construction Driven	0
Sachigo Lake (Line EG) South 80-144	Community Driven	451
Substation I - Expansion and relocation	Community Driven	0
Line CJ - 93 &114	Construction Driven	0
Line RT - A frame re-route Sub R	Construction Driven	0
Line RT - A frame re-route Sub T	Construction Driven	0
25 kV re-route Line J1	Construction Driven	0
Line VY Route Change - Winter Road Conflicts str 109-113; 195-198	Construction Driven	6

Line ZW Route Change - Winter Road Conflicts Str 139-141	Construction Driven	0
Line QR ingress change into R	Construction Driven	0
Line RS egress change from R	Construction Driven	0
S1 Reroute - 25 kV Reroute Str. 4-10	Construction Driven	115
G1 Reroute- 25 kV	Community Driven	553
Line EG- Ingress to sub G	Community Driven	12
Line ZW Route Change Str. 139-141	Construction Driven	(35)
Line DE Route Change (Str 195-Sub E)	Community Driven	8,000*
I1 Reroute - 25 kV Reroute	Community Driven	11**
Station I - ingress	Community Driven	59***
Total		8,398¹

*Reflective of forecasted value at time of filing. Change order was executed subsequent to rate application filing for \$9 million cost increase.


** Reflective of forecasted value at time of filing. Change order was executed subsequent to rate application filing for nil value.

***Executed subsequent to rate application filing at value presented in table.

- b) The routing changes have resulted in minor location changes for various substations. No substation location changes resulted in impacts to any new landowners. WPLP has secured all land rights and required permits for its substations.
- c) Please refer to the “Driver of Change” column in the table provided in response to part (a) above.
- d) Please refer to the “Cost Impact” column in the table provided in response to part (a) above.
- e) The table below identifies all outstanding routing changes that are under consideration, along with the relevant driver and the estimated cost impact. Note that although these changes remain under consideration, WPLP has already assumed they will be implemented so they are reflected in the amount of contingency that has been used per B-1-5, Table 3.

Route Change	Driver of Change	Cost Impact (000's)
Line - TZ - Route Change (str 40-44)	Construction Driven	
Sub V - Line VY- Ingress	Construction Driven	
Sub V - V1 - Egress	Construction Driven	
Substation KL - Relocation - Reroute	Community Driven	
Substation L1 - 25 kV Reroute	Community Driven	
E1 Reroute - 25 kV Reroute	Community Driven	
Line KM - A Frame to S 7	Construction Driven	

¹ The total may not add due to rounding.

K1- 25 kv - Entire Line	Construction Driven	
ZV Reroute	Construction Driven	

- f) Please refer to the response to part (e) above.
- g) WPLP does not anticipate any impacts on energization dates for any of the line sections or stations resulting from the outstanding routing changes. Note that adjustments to 2022 energization date forecasts, which are not related to routing changes, are addressed in response to OEB Staff IR 2(a) (for Pikangikum), and in response to OEB Staff IR 6(c) and HONI IR 6(a) (for North Caribou Lake First Nation and Kingfisher Lake First Nation).

² The total may not add due to rounding.

BOARD STAFF - 04

Reference: Exhibit B / Tab 1 / Schedule 2 / pages 12-13

Preamble: The reference outlines WPLP’s efforts in regard to Indigenous and Métis engagement.

Question(s):

- a) Please provide a detailed breakdown of WPLP’s 2023 costs in relation to Indigenous and Métis engagement (including training). Please note whether the cost category is related to capital, OM&A or overhead. Also provide as much detail as possible associated with each cost category, including, number of in-person meetings, number of community radio shows, number of training sessions, number of trained individuals and other relevant details.

Response:

- a) The table below provides a breakdown of WPLP’s 2023 costs in relation to Indigenous and Métis Engagement (including training). Given these costs are considered overhead costs, in accordance with WPLP’s Overhead Cost Allocation methodology, found in Appendix A of Exhibit B-1-5, the table below also provides the allocation between Capital and Indirect Operating costs.

			Capital (\$000's)	Indirect Operating (\$000's)	Total (\$000's)
Indigenous Engagement & Communications					
	Affiliate Costs (Labour)	(A)	570	662	1,232
	Community and Tribal Council Support	(B)	789	916	1,705
	Environmental Communications	(C)	139	161	300
	Communications	(D)	42	48	90
	Software	(E)	6	8	14
	Events/Meetings	(F)	256	297	553
	Travel	(G)	70	82	152
	Other		87	101	188
			1,959	2,275	4,234
Indigenous Participation					
	Affiliate Costs (Labour)	(A)	732	850	1,582
	Community and Tribal Council Support	(B)	68	78	146
	Training Programs	(H)	720	836	1,556
	Events/Meetings	(F)	140	163	303
	Travel	(G)	80	92	172
	Other		120	123	243
			1,859	2,142	4,002

- (A) OSLP services related to administering project and programs for WPLP relating to community engagement, community readiness, education and training, business readiness, stakeholder engagement, communications and capacity building.
- (B) Community Liaison and Tribal Council support to aid in information sharing and ensuring appropriate communication with communities. These services mitigate access related risk for the project.
- (C) Indigenous knowledge advisory services for environmental and land use monitoring.
- (D) Communications and publication costs including, social medial integration/promotion, brochures and radio ads on positive Indigenous impacts of the Project.
- (E) Engagement tracking software for records of engagement.
- (F) Includes 2 in-person community meetings per community (48 meetings), 27 Project specific meetings/events on unique issues facing the Project and/or ceremonies, and 3 regional events for Community Liaisons on environmental monitoring, business readiness and Indigenous participation. These costs include travel for participants, room and incidental costs and elder services.
- (G) Travel costs associated with OSLP employees to administer project and programs described in A above. Employee travel is not included in point (F) or (H), only travel costs for participants.
- (H) Training programs include 7 programs with anticipated 118 participants. Programs include Powerline Construction and Work Readiness training, Line Crew Ground Support training, Project Management training and Operation Education and Awareness training. Costs include tuition/program delivery, accommodations, transportation, training facilities and other participant incidentals/support services. Refer to the response to HONI-01 for further details on WPLP's efforts in regard to Indigenous and Métis engagement.

BOARD STAFF - 05

Reference: Exhibit B / Tab 1 / Schedule 3 / Table 2 / pages 3-4
 Exhibit B / Tab 2 / Schedule 1 / Appendix B / page 3

Preamble: WPLP’s current in-service schedule by line segment and station is presented in Table 2. Table 2 includes the in-service schedule for 9 line segments of the Red Lake Remote Connection Lines.

Appendix B includes a summary of WPLP line segments which includes 15 line segments for the Red Lake Remote Connection Lines.

Question(s):

- a) Please update Table 2 to include the in-service schedule for the 15 line segments of the Red Lake Connection Lines shown in Appendix B.

Response:

- a) The table below updates Exhibit B-1-3, Table 2 to show the in-service schedule for all 15 line segments associated with the Red Lake Connection Lines.

Asset Designation	Description	Current Forecast In-Service Date
Red Lake Remote Connection Lines		
WPQ ¹	115 kV - Red Lake SS to Existing Pikangikum 44 kV Line	12-Oct-22
Q1	25 kV - Pikangikum TS to HORCI 25 kV	In-Service ²
WQR	115 kV - Pikangikum TS to Poplar Hill SS	18-Apr-24
WRS	115 kV - Poplar Hill SS to Poplar Hill TS	18-Apr-24
S1	25 kV - Poplar Hill TS HORCI 25 kV	18-Apr-24
WRT	115 kV - Poplar Hill SS to Deer Lake SS	16-May-24
WTU	115 kV - Deer Lake SS to Deer Lake TS	16-May-24
U1	25 kV - Deer Lake TS to HORCI 25 kV	16-May-24
WTZ	115 kV - Deer Lake SS to Sandy Lake SS	16-Jun-24
WZW	115 kV - Sandy Lake SS to Sandy Lake TS	16-Jun-24
W1	25 kV - Sandy Lake TS to HORCI 25 kV	16-Jun-24
WZV	115 kV - Sandy Lake SS to North Spirit Lake TS	14-Jul-24
V1	25 kV - North Spirit Lake TS to HORCI 25 kV	14-Jul-24
WVY	115 kV – North Spirit Lake TS to Keewaywin TS	11-Aug-24
Y1	25 kV - Keewaywin TS to HORCI 25 kV	11-Aug-24

¹ WPLP has changed the name of this designation, previously known as Line P1P2.

² This 25 kV line segment was placed in service in 2018.

BOARD STAFF - 06

Reference: Exhibit B / Tab 1 / Schedule 3 / pages 2-3

Preamble: The reference outlines expected energization dates by community for the project. The reference notes that delays in certain of the community energization are primarily driven by: (1) multiple forest fires in the summer of 2021 within project site, (2) cumulative COVID-19 impacts and (3) delays in construction progress in the 2022 winter construction season.

Further, the reference specifically notes that the Kasabonika Lake community and the Wunnumin Lake community are currently expected to be energized months and 12 months earlier than previously expected, respectively.

Question(s):

- a) Specific to energization dates noted in Table 1, please explain the assumptions made with regards to forest fires during Summer 2022 and Summer 2023. In the response, please detail the extent to which the possibility of forest fires has been incorporated into the schedule. If applicable, please identify the source of information.
- b) Specific to energization dates noted in Table 1, please explain the assumptions made with regards to potential delays in construction due to the winter seasons in 2023 and 2024. In the response, please detail the extent to which construction delays have been incorporated into the schedule. If applicable, please identify the source of information.
- c) Please explain the reasons for earlier than expected energization of the Kasabonika Lake community and the Wunnumin Lake community.

Response:

- a) Valard updated its construction schedule as of May 30, 2022. The May 30, 2022, schedule reflects Valard's construction plan based on its experience and planned construction activities. WPLP's understanding is that Valard has planned for a normal level of forest fire activity, which reflects a degree of risk that Valard is able to manage with fire protection measures and no extended work outage. As a result, a normal level of forest fires during the Summer of 2022 and the Summer of 2023 would result in no impact on the May 30, 2022 schedule.
- b) It is WPLP's understanding that Valard planned for a normal level of winter construction delays in its May 30, 2022 schedule, which reflects a degree of risk that Valard is able to manage with no extended work outage. As a result there are not any specific delays related to winter construction in 2023 and 2024.

- c) When preparing the May 30, 2022 schedule, Valard took into account the respective First Nation energization needs along with available construction resources. As a result, the Kasabonika Lake First Nation and the Wunnumin Lake First Nation energization dates were moved to 2023 and Sachigo Lake First Nation was moved to 2024.

BOARD STAFF - 07

Reference: Exhibit B / Tab 1 / Schedule 3 / pages 2-3

Preamble: WPLP states that on May 30, 2022, it received a further updated project schedule from its EPC Contractor reflecting all factors known as of that date. That schedule represents the most current available project schedule and has therefore been used as the basis for this Application.

Question(s):

- a) In consideration of the significant amount of construction activity and associated capital spending that is forecasted to take place between May 30, 2022, and the expected date of the OEB's decision, does WPLP intend to update its capital cost forecasts, OM&A forecasts, in-service additions (and the impacts of changes to in-service additions on the calculation of rate base and load forecast), or any other material changes, at any time during the remainder of the proceeding? If so, please specify when WPLP anticipates filing its update.
-

Response:

- a) Construction of the planned 2023 in-service rate base additions is proceeding according to the May 30, 2022 construction schedule. Any changes in relation to the planned 2022 in-service rate base additions will be captured in the OEB-approved In-Service Date Variance Account. As a result, WPLP does not plan on updating its capital cost forecasts, OM&A forecasts, in-service additions (or the impacts of changes to in-service additions on the calculation of rate base and load forecast) during the remainder of the proceeding.

BOARD STAFF - 08

Reference: Exhibit B / Tab 1 / Schedule 3 / pages 5-6
Exhibit B / Tab 1 / Schedule 5 / pages 16-17

Preamble: In the first reference, WPLP states that risks from material and equipment delivery and from routing changing have been significantly mitigated.

In the second reference, WPLP states that based on the Owner's Engineer's latest Quantitative Risk Analysis (QRA), no change to contingency requirements has been made for the remaining construction period at this time.

Question(s):

- a) Please provide the latest report or analysis related to the Owner's Engineer's QRA.
- b) Please provide a breakdown of the contingency category and for each sub-category, please indicate the specific allocation and how much of it has been used to date.
- c) Please elaborate on why the contingency category cannot be further reduced given WPLP has indicated that the risks associated with material and equipment delivery and with routing changes have been significant mitigated.

Response:

- a) Attachments 1 and 2 hereto contain the latest Owner's Engineer's QRA reports for the Project. The report in Attachment 1 covers Owner and EPC Costs. The report in Attachment 2 covers COVID-19 risks. The reports were prepared as of July 1, 2022. Please note that Attachments 1 and 2 are being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.
- b) WPLP uses the QRA analysis prepared by the Owner's Engineer to allocate the contingency to 13 EPC Risk categories, 1 Non-EPC risk category and COVID-19. The table below provides the requested breakdown of the contingency category and for each sub-category the specific allocation amount and how much of it has been used to date. Please note that part of this response is being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.

		Contingency	Utilization	Remaining
EPC Contingency				
1	Line route change			
2	Substation location change			
3	Owner Permit delays			

4	Onerous (new) permit conditions	
5	LiDAR data error	
6	HONI-HORCI delays	
7	Archeological finding (major)	
8	Pre-existing hazardous material	
9	Review delays	
10	Forest fire (major)	
11	Work stoppage – access issue (major)	
12	Additional scope	
13	Design requirements/code change	
Total EPC Contingency		
Non-EPC Contingency		
Total Project Contingency		

A separate table has been provided for COVID-19 contingency. Given the COVID-19 risk was not foreseen, the full forecast is reflected in contingency.

	Contingency	Utilization	Remaining
COVID-19 Contingency			

- c) Notwithstanding that the risks associated with material and equipment delivery and routing changes have been significantly mitigated, it is not appropriate for WPLP to reduce contingency at this time because there are a number of potential claims being discussed with the EPC contractor (Forest Fire, Access and COVID-19). WPLP also notes that, as described in Exhibit H-1-1, p. 8, it is not seeking to add contingency to its rate base in this application consistent with the approach that was approved in EB-2021-0134. As a result, there is no impact on ratepayers other than potentially increasing the cap on the Deferred Contingency Deferral Account, which would enable incremental amounts to be recorded that would be subject to consideration in a future OEB rate proceeding.

Attachment 1

**Wataynikaneyap Power Transmission Project QRA Results
August 10, 2022**

+ Wataynikaneyap Power Transmission Project

Quantitative Risk Analysis (QRA) Results



August 10, 2022

HATCH

Owner's Cost
[Excluding Spent Cost and EPC Cost]

Owner's Remaining Construction Cost Base Estimate and Associated Ranges

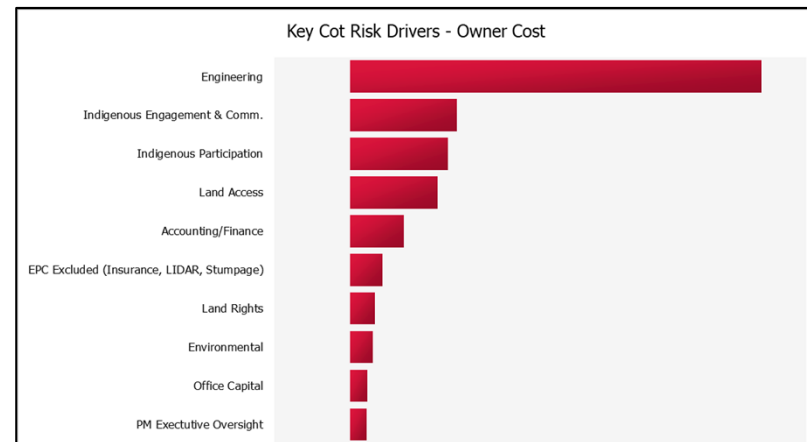
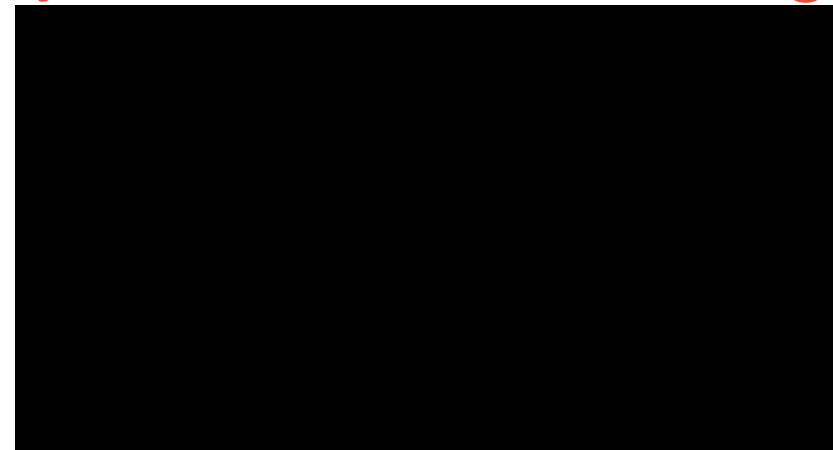
Cost Category	Total Remaining Spend	Price					Quantity				
		Min (P1)	Low (P10)	Det	High (P90)	Max (P99)	Min (P1)	Low (P10)	Det	High (P90)	Max (P99)
EPC Excluded (Insurance, LIDAR, Stumpage)	\$ 1,329,254	0.80	0.90	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
Other Infrastructure	\$ 9,294,608	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Office Capital	\$ 714,540	0.80	0.90	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
HONI Interconnection	\$ 3,913,000	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Non EPC Costs											
Engineering	\$ 28,405,614	1.00	1.00	1.00	1.03	1.05	0.90	0.95	1.00	1.10	1.15
Health and Safety	\$ 620,981	1.00	1.00	1.00	1.03	1.05	1.00	1.00	1.00	1.00	1.00
Permitting	\$ 603,444	1.00	1.00	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
Environmental	\$ 1,565,572	1.00	1.00	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
Land Rights	\$ 1,503,999	0.85	0.95	1.00	1.10	1.20	1.00	1.00	1.00	1.00	1.00
Land Access	\$ 3,601,608	0.80	0.90	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
Aboriginal Engagement	\$ 150,357	0.80	0.90	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
Communications	\$ 595,009	1.00	1.00	1.00	1.03	1.05	1.00	1.00	1.00	1.10	1.15
Regulatory	\$ 851,465	0.95	0.97	1.00	1.05	1.10	1.00	1.00	1.00	1.00	1.00
Accounting/Finance	\$ 4,350,393	1.00	1.00	1.00	1.03	1.05	1.00	1.00	1.00	1.10	1.15
Executive Oversight	\$ 898,529	1.00	1.00	1.00	1.03	1.05	1.00	1.00	1.00	1.10	1.15
PM Executive Oversight	\$ 444,043	1.00	1.00	1.00	1.03	1.05	1.00	1.00	1.00	1.10	1.15
Human Resources	\$ 483,309	1.00	1.00	1.00	1.03	1.05	1.00	1.00	1.00	1.10	1.15
Information Technology	\$ 329,621	0.85	0.95	1.00	1.10	1.20	1.00	1.00	1.00	1.00	1.00
Aboriginal Land Rights	\$ 62,405	0.95	0.97	1.00	1.03	1.05	1.00	1.00	1.00	1.00	1.00
Aboriginal Participation	\$ 145,393	0.80	0.90	1.00	1.15	1.25	1.00	1.00	1.00	1.00	1.00
OSLP Costs											
Indigenous Engagement & Comm.	\$ 4,402,633	0.75	0.85	1.00	1.10	1.20	1.00	1.00	1.00	1.00	1.00
Stakeholder Engagement	\$ 100,198	0.75	0.85	1.00	1.10	1.20	1.00	1.00	1.00	1.00	1.00
Indigenous Participation	\$ 4,027,112	0.75	0.85	1.00	1.10	1.20	1.00	1.00	1.00	1.00	1.00
Regulatory	\$ 36,883	0.75	0.85	1.00	1.10	1.20	1.00	1.00	1.00	1.00	1.00
Land Access	\$ -										
Administration	\$ 1,568,963	1.00	1.00	1.00	1.00	1.05	1.00	1.00	1.00	1.00	1.00
Total	69,998,931										

- Owner's Remaining Cost : Estimate developed based on Owner's experience with other projects (in-house data), budgetary estimates and inputs from service providers.
- Owner's cost updated in July 2022 and reflect construction continuing into 2024.
- Estimate ranges updates provided by the Owner team

Owner's Cost - Contingency Values and Percentages

- Base estimate of remaining cost \$69,998,931
- P50 Contingency (50/50 chance of being underspent/overspent): [REDACTED]
- P99 Contingency: [REDACTED]

Percentile	Total Owner's Cost	Contingency \$	Contingency %
1%	\$64,693,592	[REDACTED]	[REDACTED]
5%	\$66,208,801	[REDACTED]	[REDACTED]
10%	\$67,237,255	[REDACTED]	[REDACTED]
15%	\$67,971,624	[REDACTED]	[REDACTED]
20%	\$68,631,525	[REDACTED]	[REDACTED]
25%	\$69,177,850	[REDACTED]	[REDACTED]
30%	\$69,740,999	[REDACTED]	[REDACTED]
35%	\$70,269,861	[REDACTED]	[REDACTED]
40%	\$70,804,974	[REDACTED]	[REDACTED]
45%	\$71,263,872	[REDACTED]	[REDACTED]
50%	\$71,822,335	[REDACTED]	[REDACTED]
55%	\$72,336,871	[REDACTED]	[REDACTED]
60%	\$72,856,238	[REDACTED]	[REDACTED]
65%	\$73,321,949	[REDACTED]	[REDACTED]
70%	\$73,861,171	[REDACTED]	[REDACTED]
75%	\$74,379,857	[REDACTED]	[REDACTED]
80%	\$74,953,116	[REDACTED]	[REDACTED]
85%	\$75,739,706	[REDACTED]	[REDACTED]
90%	\$76,595,931	[REDACTED]	[REDACTED]
95%	\$77,800,202	[REDACTED]	[REDACTED]
99%	\$79,796,670	[REDACTED]	[REDACTED]



The tornado graph shows the cost items the Owner's team should focus their mitigation efforts on in order to reduce contingency.

Project's EPC Cost

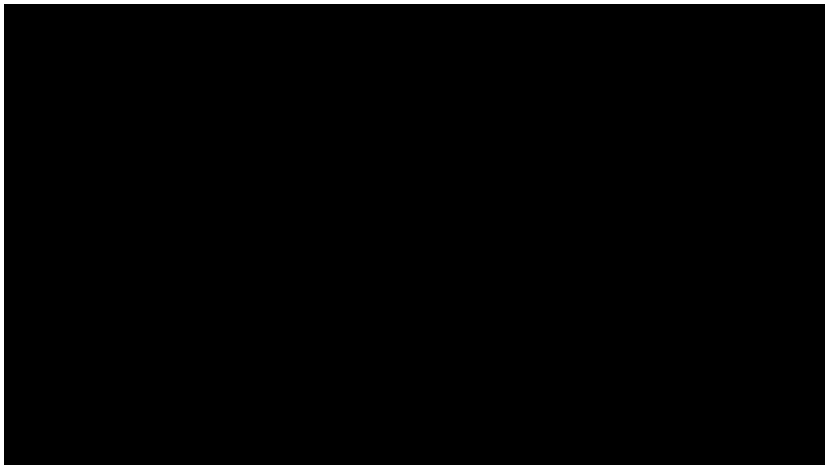
Contingency Category-1

Contingency Category -1 (Formerly “75% & 90% probability of occurrence risk events”)

This amount to be added to the QRA based contingencies calculated in subsequent slides.

Risk	Contingency \$
G1_Forest fire impacts – full Group (4-weeks)	
G2_Forest fire impacts – full Group (4-weeks)	
G3_Forest fire impacts – full Group (8-weeks)	
Contingency Category 1 Total	

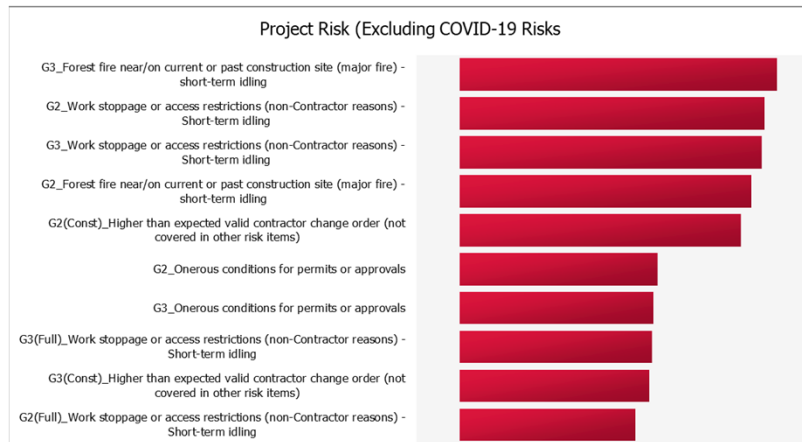
Project Risk Events for Contingency Category-2



Contingency for Project Risk Events :

- P50 Contingency: [REDACTED]
- P99 Contingency: [REDACTED]

1%	[REDACTED]
5%	[REDACTED]
10%	[REDACTED]
15%	[REDACTED]
20%	[REDACTED]
25%	[REDACTED]
30%	[REDACTED]
35%	[REDACTED]
40%	[REDACTED]
45%	[REDACTED]
50%	[REDACTED]
55%	[REDACTED]
60%	[REDACTED]
65%	[REDACTED]
70%	[REDACTED]
75%	[REDACTED]
80%	[REDACTED]
85%	[REDACTED]
90%	[REDACTED]
95%	[REDACTED]
99%	[REDACTED]



The tornado graph (left) shows the risk events the Owner's team should assign mitigation efforts to in order to reduce contingency.

Project Risk Events Ranges – 1/4

No.	Risk Event - Category 2	% Probability		Cost Risk			Notes
		Will Happen	Will Not Happen	Min	ML	Max	
1	G1_Work stoppage or access restrictions (non-Contractor reasons) - Short-term idling						
2	G2_Work stoppage or access restrictions (non-Contractor reasons) - Short-term idling						
3	G3_Work stoppage or access restrictions (non-Contractor reasons) - Short-term idling						
4	G1_Work stoppage or access restrictions (non-Contractor reasons) - crew shifting						
5	G2_Work stoppage or access restrictions (non-Contractor reasons) - crew shifting						
6	G3_Work stoppage or access restrictions (non-Contractor reasons) - crew shifting						
7	G1(Full)_Work stoppage or access restrictions (non-Contractor reasons) - Short-term idling						
8	G2(Full)_Work stoppage or access restrictions (non-Contractor reasons) - Short-term idling						
9	G3(Full)_Work stoppage or access restrictions (non-Contractor reasons) - Short-term idling						
10	G1_Work stoppage or access restrictions (non-Contractor reasons) - Long-term delay						
11	G2_Work stoppage or access restrictions (non-Contractor reasons) - Long-term delay						
12	G3_Work stoppage or access restrictions (non-Contractor reasons) - Long-term delay						
13	G1_Forest fire near/on current or past construction site (major fire) - short-term idling						
14	G2_Forest fire near/on current or past construction site (major fire) - short-term idling						
15	G3_Forest fire near/on current or past construction site (major fire) - short-term idling						

Project Event Risks Ranges – 2/4

No.	Risk Event - Category 2	% Probability		Cost Risk			Notes
		Will Happ	Will Not Happen	Min	ML	Max	
16	G1_Forest fire near/on current or past construction site (major fire) - crew shifting						
17	G2_Forest fire near/on current or past construction site (major fire) - crew shifting						
18	G3_Forest fire near/on current or past construction site (major fire) - crew shifting						
19	G1(Design)_Higher than expected valid contractor change order (not covered in other risk items)						
20	G2(Design)_Higher than expected valid contractor change order (not covered in other risk items)						
21	G3(Design)_Higher than expected valid contractor change order (not covered in other risk items)						
22	G1(Material)_Higher than expected valid contractor change order (not covered in other risk items)						
23	G2(Material)_Higher than expected valid contractor change order (not covered in other risk items)						
24	G3(Material)_Higher than expected valid contractor change order (not covered in other risk items)						
25	G1(Const.)_Higher than expected valid contractor change order (not covered in other risk items)						
26	G2(Const)_Higher than expected valid contractor change order (not covered in other risk items)						
27	G3(Const)_Higher than expected valid contractor change order (not covered in other risk items)						
28	G1_Potential archaeological findings (Major)						
29	G2_Potential archaeological findings (Major)						
30	G3_Potential archaeological findings (Major)						

Project Event Risks Ranges – 3/4

No.	Risk Event - Category 2	% Probability		Cost Risk			Notes
		Will Happ	Will Not Happen	Min	ML	Max	
31	G1_Unmanageable submittals schedule of contractor						
32	G2_Unmanageable submittals schedule of contractor						
33	G3_Unmanageable submittals schedule of contractor						
34	G1_Onerous conditions for permits or approvals						
35	G2_Onerous conditions for permits or approvals						
36	G3_Onerous conditions for permits or approvals						
37	G1_Change in line route						
38	G2_Change in line route						
39	G3_Change in line route						
40	G1_Change in sub-station location						
41	G2_Change in sub-station location						
42	G3_Change in sub-station location						
43	G1_Change in line route - [Owner permitting cost]						
44	G2_Change in line route - [Owner's permitting cost]						
45	G3_Change in line route - [Owner's permitting cost]						
46	G1_HONI-HORCI delays in commissioning						
47	G2_HONI-HORCI delays in commissioning						
48	G3_HONI-HORCI delays in commissioning						
49	G1_Delay in Watay permits (e.g. Water crossings) that cause Contractor delays						
50	G2_Delay in Watay permits (e.g. Water crossings) that cause Contractor delays						
51	G3_Delay in Watay permits (e.g. Water crossings) that cause Contractor delays						

Project Event Risks Ranges – 4/4

No.	Risk Event - Category 2	% Probability		Cost Risk			Notes
		Will Happ	Will Not Happen	Min	ML	Max	
52	G1 Error in LiDAR data						
53	G2 Error in LiDAR data						
54	G3 Error in LiDAR data						
55	G1_Idling of Skycrane helicopter due to non-Contractor reasons						
56	G2_Idling of Skycrane helicopter due to non-Contractor reasons						
57	G3_Idling of Skycrane helicopter due to non-Contractor reasons						
58	G1_Long-term stranded cranes due to non-Contractor reasons						
59	G2_Long-term stranded cranes due to non-Contractor reasons						
60	G3_Long-term stranded cranes due to non-Contractor reasons						
61	G1_Major forest fire (impacting full group)						
62	G2_Major forest fire (impacting full group) - inadequate provision in Contingency Category-1						
63	G3_Major forest fire (impacting full group) - inadequate provision in Contingency Category-1						

Notes

- 1 COVID-19 impacts are not included in the above QRA.
- 2 Cost items that are already being included in the forecast or in the Change Orders are not included in this QRA.
- 3 Any Owner initiated schedule compressions are not included in the above QRA.
- 4 Any Owner initiated work stoppages are not included in the above QRA.
- 5 Extra works (not directly required for the Project) but may have to be executed (e.g. All-season roads where not required for Project construction) are not included.
- 6 Pre-existing contaminations at locations other than Pickle Lake are not included. Low probability.
- 7 Future changes in CSA specifications are not included. [Not applicable retroactively; but can be considered, if occurs].
- 8 Owner cost due to project delays are not included.
- 9 Valard has issued notice related to access issues in the Whitefeather Forest area. The corresponding impacts are not included.
- 10 Group-1 is mostly completed and that is accounted for in the analysis.
- 11 Crew strengths and camp costs are increased to account for the increased number of work fronts expected to be active; and the activity-types (e.g. stringing) which require more personnel.

Recommendations and Next Steps

- Recommendations are as follows:
 - Total project contingency to be calculated as the sum of Owner's cost contingency, EPC Cost Contingency Category 1 and EPC Cost Contingency Category 2.
 - Regular QRA assessments and updates during the course of Project.



HATCH

Attachment 2

**Wataynikaneyap Power Transmission Project COVID-19 Risks
August 10, 2022**

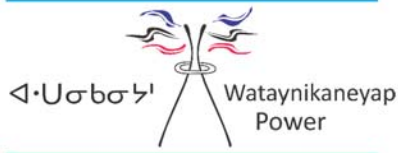
+ Wataynikaneyap Power Transmission Project

Quantitative Risk Analysis (QRA) Results



August 10, 2022

[COVID-19 Risks Only for Project EPC Cost]



HATCH

Project Risk Events (COVID-19 Risks only) for Contingency Category-2

Contingency for COVID Risks:

- P50 Contingency: [REDACTED]
- P99 Contingency: [REDACTED]

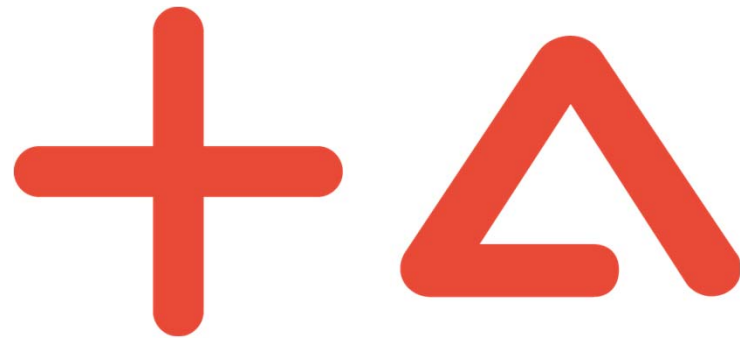
Risk Ranges:

Percentile	Contingency
1%	[REDACTED]
5%	[REDACTED]
10%	[REDACTED]
15%	[REDACTED]
20%	[REDACTED]
25%	[REDACTED]
30%	[REDACTED]
35%	[REDACTED]
40%	[REDACTED]
45%	[REDACTED]
50%	[REDACTED]
55%	[REDACTED]
60%	[REDACTED]
65%	[REDACTED]
70%	[REDACTED]
75%	[REDACTED]
80%	[REDACTED]
85%	[REDACTED]
90%	[REDACTED]
95%	[REDACTED]
99%	[REDACTED]

No.	Risk Event	Will Happen	Will Not Happen	Min	ML	Max	Notes
C1	COVID-19 Vaccination costs - July to December 2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C2	COVID-19 Testing costs - July to December 2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C3	COVID-19 Quarantine costs - July to December 2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C4	COVID-19 Variable costs (productivity only) - July to December 2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C5	COVID-19 Variable costs (excluding productivity) - July to December 2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C6	COVID-19 Vaccination costs - January to June 2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C7	COVID-19 Testing costs - January to June 2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C8	COVID-19 Quarantine costs - January to June 2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C9	COVID-19 Variable costs (productivity only) - January to June 2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C10	COVID-19 Variable costs (excluding productivity) - January to June 2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Notes

1. Only variable costs are considered.
2. Cost for major delays are not considered.
3. Potential credit for early resolution of COVID-19 impacts on flight costs are not considered.



HATCH

BOARD STAFF - 09

Reference: Exhibit B / Tab 1 / Schedule 4 / page 13

Preamble: WPLP states that further to the ongoing inspection, maintenance and emergency response procurement process, to satisfy the immediate need for 24/7 control operations, WPLP is in the process of negotiating an agreement for Hydro One Networks Inc. to provide control room services for an interim period until such time that WPLP develops its own control room.

Question(s):

- a) Please advise when the control room services are expected to come into service.
- b) What is the expected duration and annual cost of the interim control room services?
- c) When does WPLP anticipate having its own control room in service?

Response:

- a) The control room service agreement with HONI was executed on August 18, 2022, with an effective service date of August 18, 2022.
- b) The initial term of the agreement runs until December 31, 2022. The agreement shall thereafter be automatically renewed for successive periods of one year upon the same terms and conditions. The annual cost of the interim control room service is determined based on a number of factors: (1) Circuit Kilometers Operated, (2) Auto-Transformers included, (3) Transformers Operated, and (4) Network Management System (“NMS”) Points associated with equipment. For the 2023 Test Year, the estimated cost of interim control services is \$3.12 million as provided for in Table 2 - 2023 OM&A Cost Drivers (Exhibit F-2-1).
- c) WPLP has not set a fixed date for having its own control room.

BOARD STAFF - 10

Reference: Exhibit B / Tab 1 / Schedule 5 / page 3

Preamble: WPLP cost categories include EPC-Contract costs (including incremental construction costs related to COVID-19), Non-EPC Capital costs, overhead costs, direct O&M costs, and contingency costs. Through a changing order process, these costs are updated to reflect changes impacting the overall project execution. In reference to incremental COVID-19 costs, change orders and contingency costs:

Question(s):

- a) Please explain how these costs are categorized, identified, and accounted for to avoid duplication.
- b) Please elaborate on the contingency costs and how these costs are identified.

Response:

- a) WPLP has a robust budgeting, forecasting and accounting process to ensure its costs are identified, categorized, and accounted for in a manner that avoids duplication. WPLP uses SAP (System Applications and Products in Data Processing), Docusign and Ipas (to track and categorize costs) software to manage these processes. In addition, these software packages are subject to internal audit and SAP processes are also tested as a part of WPLP's external audit. The costs are accounted for as follows:
 - EPC-Contract Costs are provided from the EPC Contractor and are subject to the terms and conditions of the EPC Contract. To the extent there are realized incremental EPC-Contract Costs they are captured via a change order. The executed change order allocates the costs to the appropriate cost categories within the EPC Contract.
 - Non-EPC Capital Costs are incurred directly by WPLP and are not included in the EPC Contract. When incurring Non-EPC Capital Costs, WPLP may procure the relevant services through Valard via a change order to minimize costs. In those circumstances, WPLP separately tracks the Non-EPC Capital Costs incurred from Valard and allocates the costs to the appropriate Non-EPC Capital Costs to ensure the costs are categorized, identified, and accounted for without duplication.
 - Non-EPC Costs (overhead costs, direct O&M costs) are incurred by WPLP, either directly or indirectly through WPPM or OSLP, and are tracked accordingly to avoid

- duplication. These costs follow WPLP's robust, bottom-up budgeting approach with process controls reviewed by internal audit.
- Contingency utilization is determined through a comprehensive risk management system that tracks all known project risks. WPLP assigns a provisional value to a project risk once any such risk is determined to be the responsibility of WPLP. To the extent the utilization of a contingency is realized, the cost is tracked within the applicable cost category noted above. To the extent the contingency utilization has not been realized, WPLP separately tracks the contingency utilization and allocates the contingency to EPC-Contract Costs or Non-EPC Capital Costs, as appropriate, to ensure the costs are categorized, identified, and accounted for without duplication.
- b) WPLP has implemented a comprehensive risk management system to track all known project risks. WPLP identifies project risks through: (1) Contractor Change Requests submitted by the Contractor (where Contractor is requesting a change), (2) Contemplated Change Order provided by WPLP (where WPLP is requesting a change), or (3) by internally (but not officially communicated to Valard via a Contemplated Change Order) identifying risks that have not been identified through a Contractor Change Request or Contemplated Change Order. Once a risk is identified to be WPLP's responsibility, WPLP, with assistance from its Owner's Engineer, Hatch, assigns a provisional monetary value to a project risk. WPLP and Hatch meet bi-weekly to review the provisional values and make adjustments based on the best available information. When a change order is executed, or the costs are incurred, WPLP adjusts the provisional value to reflect actual costs. WPLP does not record reductions in project costs unless a Change Order is executed pursuant to the EPC contract.

BOARD STAFF - 11

Reference: Exhibit B / Tab 1 / Schedule 2 / pages 11-12

Preamble: In the context of Independent Power Authorities (IPAs), WPLP states that target completion dates for all construction activities and other transfer requirements and conditions are aligned with the target in-service dates for each community. WPLP further states that Asset Transfer Agreements and Section 28 (2) permits will be finalized on a rolling basis in parallel with the completion of those activities for each community.

Question(s):

- a) Please provide an update on the timing of when the Asset Transfer Agreements and Section 28(2) permits will be finalized. Please also explain whether there is any risk these items will not be finalized prior to the scheduled in-service dates for the IPA communities. If so, please outline the potential implications of such a risk materializing.
- b) Are there any other outstanding items, including permits and approvals required, that may impact the timing of the construction of the Transmission System? If so, please specify which ones and the expected timeframe for acquiring them.

Response:

- a) As indicated in Exhibit B-1-2, pp. 11-12, the conversion of the IPA communities is outside the scope of WPLP's responsibility. WPLP nevertheless monitors the progress of the IPA conversions through OSLP, and reports provided by Indigenous Services Canada. WPLP is not aware of any risk items that will not be finalized prior to the scheduled in-service dates for the IPA communities. Attachment 1 hereto is a copy of the most recent IPA update, which has been provided by Indigenous Services Canada. The attached IPA update includes the best information available.
- b) WPLP is not aware of any outstanding items, such as permits or approvals, that may impact the timing of the construction of the Transmission System.

Attachment 1

ISC IPA Upgrades and Transfer Projects Report



Status Update: Watay Project Parallel Process Projects September 2022



IPA Upgrades & Transfer Projects

Overview: In six communities currently serviced by Independent Power Authorities (IPA), bring local distribution (Dx) systems up to provincial standards, construct Compound (C) sites for Hydro One Remote Communities Inc. (REMOTES), collection customer information for REMOTES, and execute Transfer Agreements and permits.

COMMUNITY	PROJECT ACTIVITIES AND STATUS					OVERALL STATUS
	DESIGN, TENDER & PRE-CONSTRUCTION	CONSTRUCTION	CUSTOMER INFO COLLECTION	AGREEMENTS / PERMITS (✓ Executed)	GRID CONNECTION DATE***	
Wunnumin	✓	Dx: ESA** inspected (passed); project close-out underway	Underway	Transfer Agreement 28(2) permit	May 2023	✓ On track
		C: substantial completion targeted fall 2022				
Muskrat Dam	✓	Dx: ESA inspected (passed); project close-out underway	Forthcoming	✓ MNRF Land Use Permit (C) Transfer Agreement 28(2) Permit (Dx)	June 2023	✓ On track
		C: substantial completion targeted fall 2022				
Wawakapewin	✓	Dx: ESA inspected (passed); project close-out underway	Forthcoming	Transfer Agreement 28(2) permit	July 2023	✓ On track
		C&H: substantial completion targeted fall 2022				
Poplar Hill	✓	Dx: ESA inspected (passed); project close-out underway	Underway	✓ MNRF Land Use Permit (C) Transfer Agreement 28(2) Permit (Dx)	April 2024	✓ On track
		C: substantial completion targeted fall 2022				
North Spirit Lake	✓	Dx: ESA inspected (passed); project close-out underway	Forthcoming	Transfer Agreement 28(2) permit	July 2024	✓ On track
		C: Substantially complete				
Keewaywin	✓	Dx: ESA inspected; minor deficiencies being addressed	Forthcoming	Transfer Agreement 28(2) permit	August 2024	✓ On track
		C: Substantially complete				

***Connection dates are from Watay Power's semi-annual update to the OEB in June 2022 <https://www.rds.oeb.ca/CMWebDrawer/Record?q=casnumber:EB-2022-0149&sortBy=recRegisteredOn-&pageSize=400#form1>

Green = Complete / Yellow = Underway / Red = To be completed
GCDOCS # 87251332

BOARD STAFF - 12

Reference: Exhibit B / Tab 1 / Schedule 5 / pages 8-10

Preamble: EPC costs for transmission line facilities are \$18.3 million higher when compared with WPLP’s 2022 rate application forecast, while EPC costs for station facilities are \$6.4 million higher.

WPLP states that the difference is attributable to executed and expected change orders related to forest fire impacts and route changes for the remainder of the construction period.

Question(s):

- a) Please provide a breakdown of the increase in EPC costs associated with the transmission line facilities and station facilities separately for the Line to Pickle Lake and the Remote Connection Lines. Below is a sample template to provide the information.

	Total Variance(\$000s)	Variance Attributable to Forest Fire Impacts	Variance Attributable to Route Changes
Transmission Line Facilities- Line to Pickle Lake	1,861		
Transmission Line Facilities- Remote Connection Lines	16,434		
Station Facilities- Line to Pickle Lake	1,783		
Station Facilities- Remote Connection Lines	4,612		

- b) What steps did WPLP and its Owner’s Engineer take to satisfy themselves that the increase in EPC costs for transmission line facilities are appropriate? Please also provide any available reports that discuss or analyze the cost increases.

- c) For each of the 10 transmission line sections going into service in 2023, please provide in table format the 2022 rate application as amended estimate compared to the current cost forecast. For any transmission line segments with cost increases of more than 5%, please briefly explain the reasons for the cost increase and whether it is related to forest fire impacts, route changes or other factors.
- d) What steps did WPLP and its Owner’s Engineer take to satisfy themselves that the increase in EPC costs for station facilities are appropriate? Please also provide any available reports that discuss or analyze the cost increases.
- e) For each of the 5 stations going into service in 2023, please provide in table format the 2022 rate application as amended estimate compared to the current cost forecast. For stations with cost increases of more than 5%, please briefly explain the reasons for the cost increase and whether it is related to forest fire impacts, route changes or other factors.

Response:

- a) Please see table below with the breakdown of the increase in EPC costs associated with the transmission line facilities and station facilities. Please note part of this response is being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.

	Total Variance	Forest Fire Impacts	Route Changes	Additional Scope	Design Changes
Transmission Line Facilities- Line to Pickle Lake	1,861				
Transmission Line Facilities- Remote Connection Lines	16,434				
Station Facilities- Line to Pickle Lake	1,783				
Station Facilities- Remote Connection Lines	4,612				
Total	24,690				

- b) Consistent with the process described in Staff-10(b), the increase in EPC costs for transmission line facilities was initially considered through WPLP’s risk management process. WPLP with assistance from its Owner’s Engineer, Hatch, analyzed the risk to

determine the provisional value, and subsequently requested that Valard provide change order details as required under the EPC Contract. Once received, WPLP with assistance from Hatch utilized the unit pricing included in the EPC Contract and their previous experience to determine if the costs were reasonable. To the extent the risks were not identified by Valard or Valard did not provided an estimate, WPLP with the assistance of Hatch used unit pricing in the contract and their past experience to determine the proper value.

Attachment 1 contains all available reports completed by Hatch to support the cost increases to transmission line facilities provided in response (a) above. The forest fire report attached therein, is applicable to cost increases for both transmission line and substation facilities. Please note that portions of Attachment 1 is being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.

- c) The following table compares EPC costs between the 2022 rate application as amended and the current forecast for the 10 transmission lines coming into service in 2023.

Asset Designation	Description	EPC Costs		Variance (\$000)	
		2022 Rate Application as Amended	Current Cost Forecast		
Line WJK	115 kV - Kingfisher Lake TS to Wawakapewin TS			-1%	
Line WK1 (25kV)	25 kV - Wawakapewin TS to HORCI Wawakapewin			0%	
Line DE	115 kV - North Caribou Lake TS to Muskrat Dam TS			16%	(A)
Line E1 (25kV)	25 kV - Muskrat Dam TS to HORCI Muskrat Ram			17%	(B)
Line EF	115 kV - Muskrat Dam TS to Bearskin Lake TS			0%	
Line F1 (25kV)	25 kV - Bearskin Lake TS to HORCI Bearskin Lake			0%	
Line JI	44 kV - Kingfisher TS to Wunnumin TS			2%	
Line I1 (25kV)	25 kV - Wunnumin TS to HORCI Wunnumin			1%	
Line KL	44 kV - Wawakapewin TS to Kasabonika TS			2%	
Line L1 (25kV)	25 kV - Kasabonika TS to HORCI Kasabonika			0%	
				5%	

(A) This is a community driven route change (structure 195-substation E). The change was

made to address environmental concerns with the initial route and to allow for a potential community road in future, located within the initial right of way.

(B) This is a community driven route change to the 25kV segment to accommodate community road locations near the initial right of way.

For additional information on route changes please refer to OEB Staff IR 3 (e).

- d) The response to (b), above, also applies to the increase in EPC costs for station facilities.

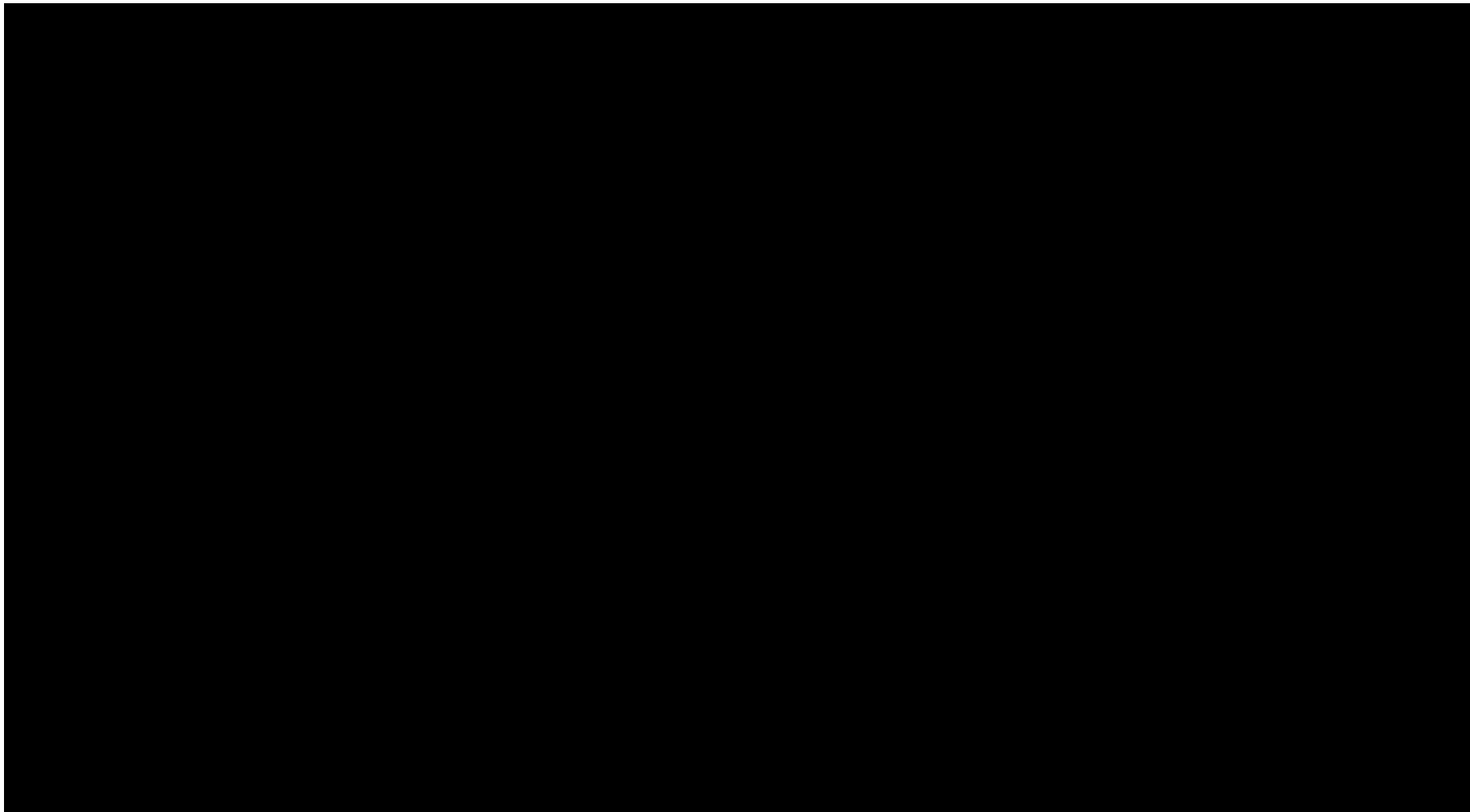
Attachment 2 contains copies of the available reports that discuss or analyze the referenced cost increases related to substation facilities. Please refer to the forest fire report provided in response to part (b), above, as applicable to the substation facilities cost increase. Please note that Attachment 2 is being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.

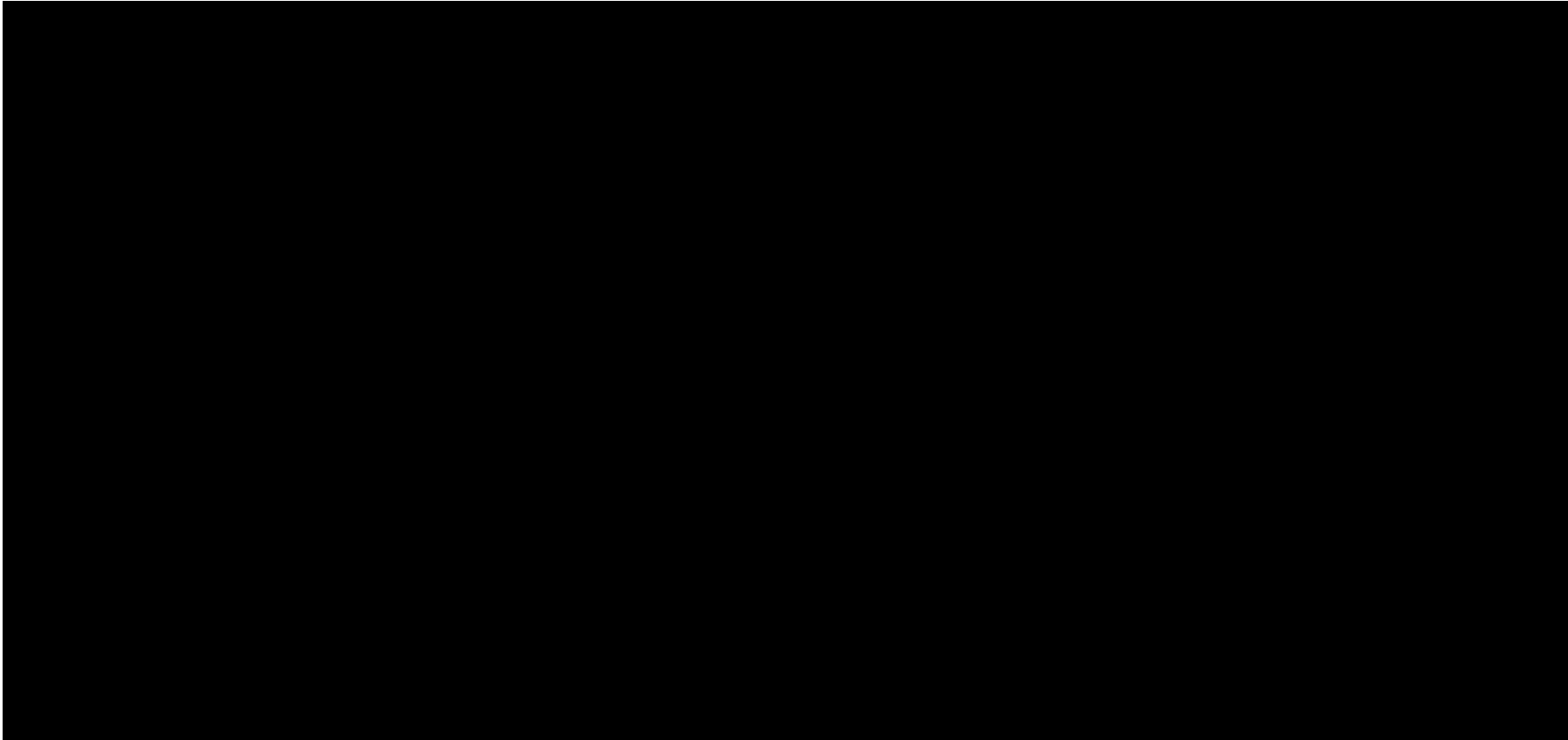
- e) The following table compares EPC costs between the 2022 rate application as amended and the current forecast for the 5 stations coming into service in 2023.

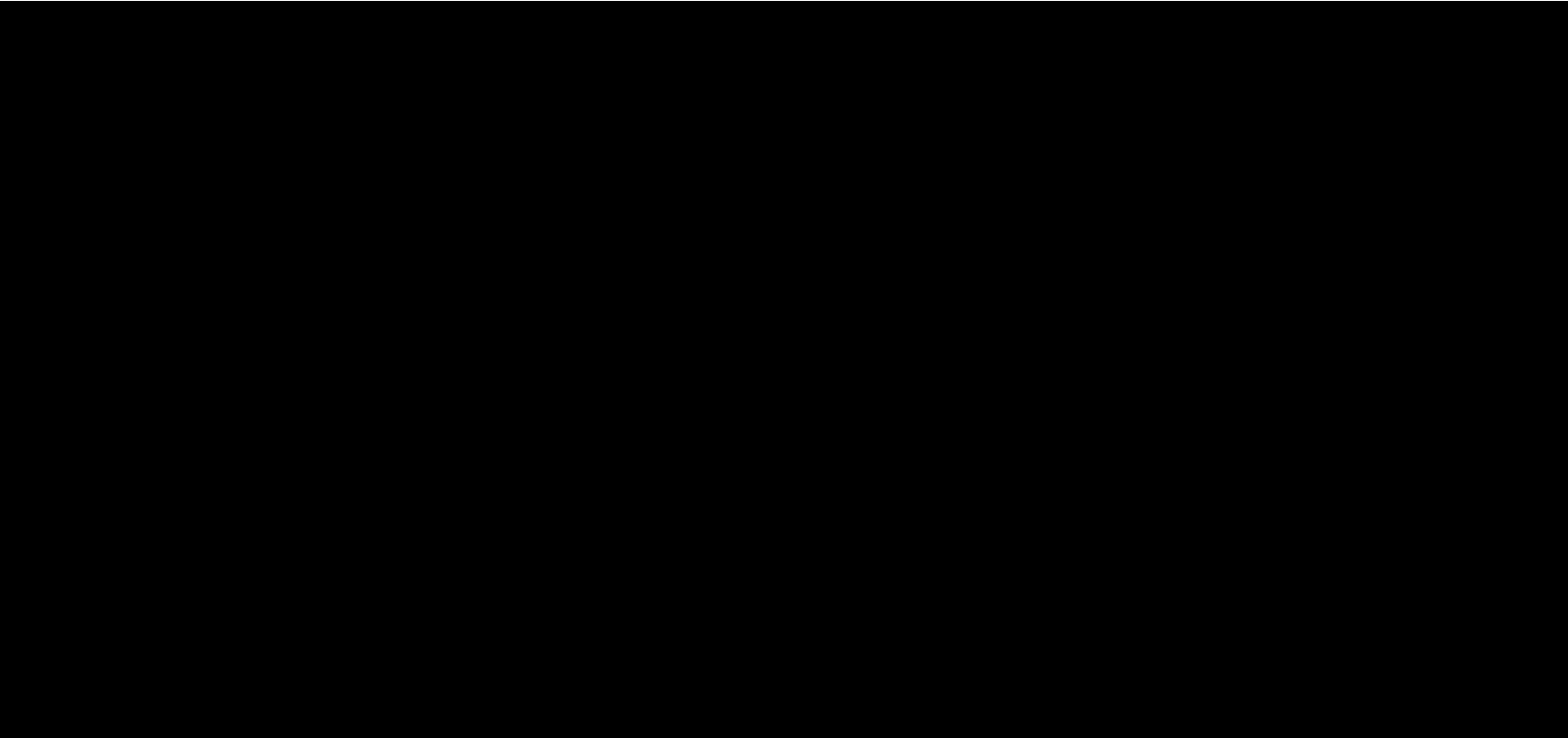
Asset Designation	Description	EPC Costs		Variance (\$000)
		2022 Rate Application as Amended	Current Cost Forecast	
Station E	Muskrat Dam TS			1%
Station F	Bearskin Lake TS			2%
Station K	Wawakapewin TS			0%
Station I	Wunnumin Lake TS			1%
Station L	Kasabonika Lake TS			1%
				1%

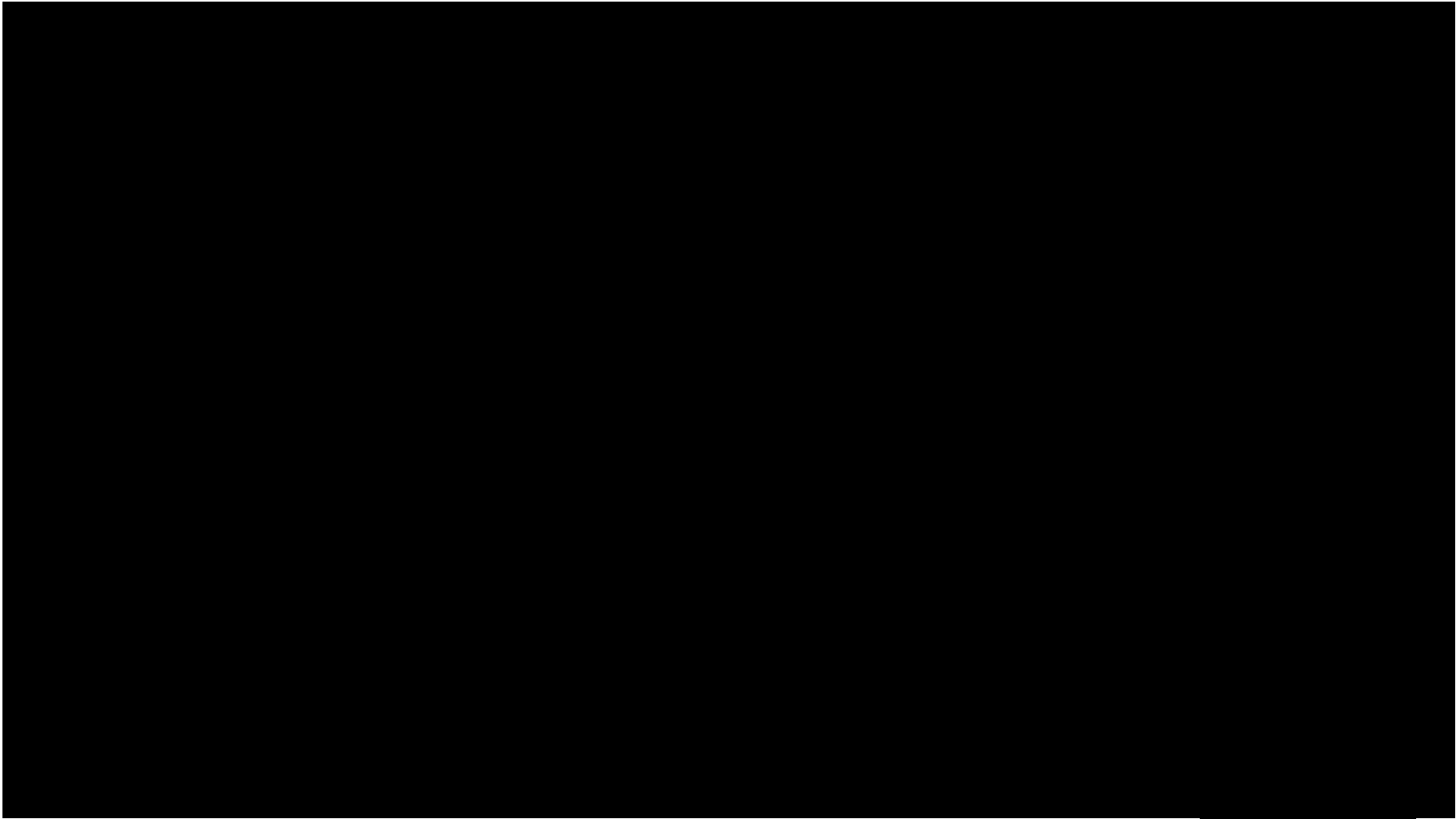
Attachment 1

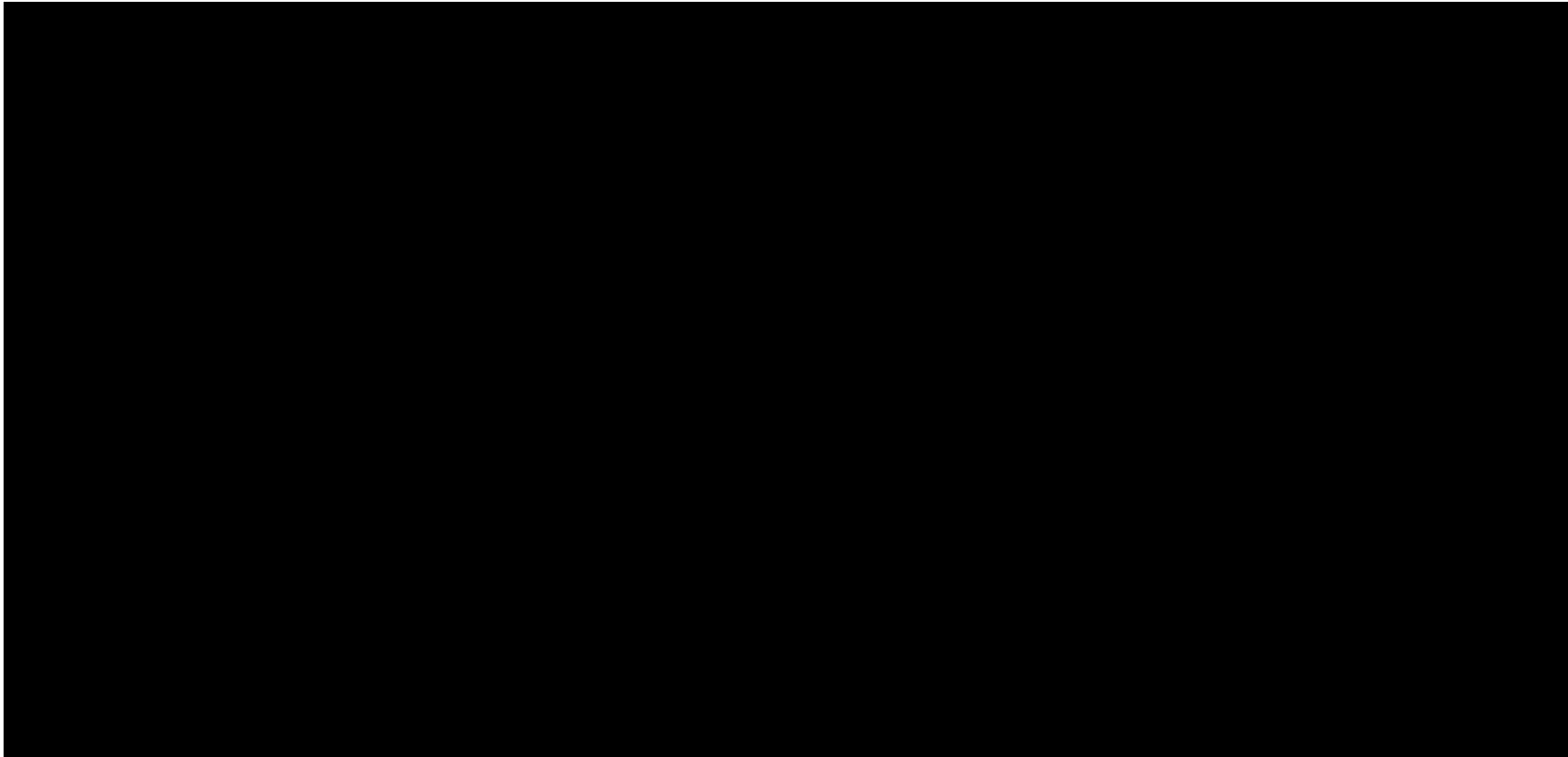
Hatch's Reports re Transmission Line Facilities

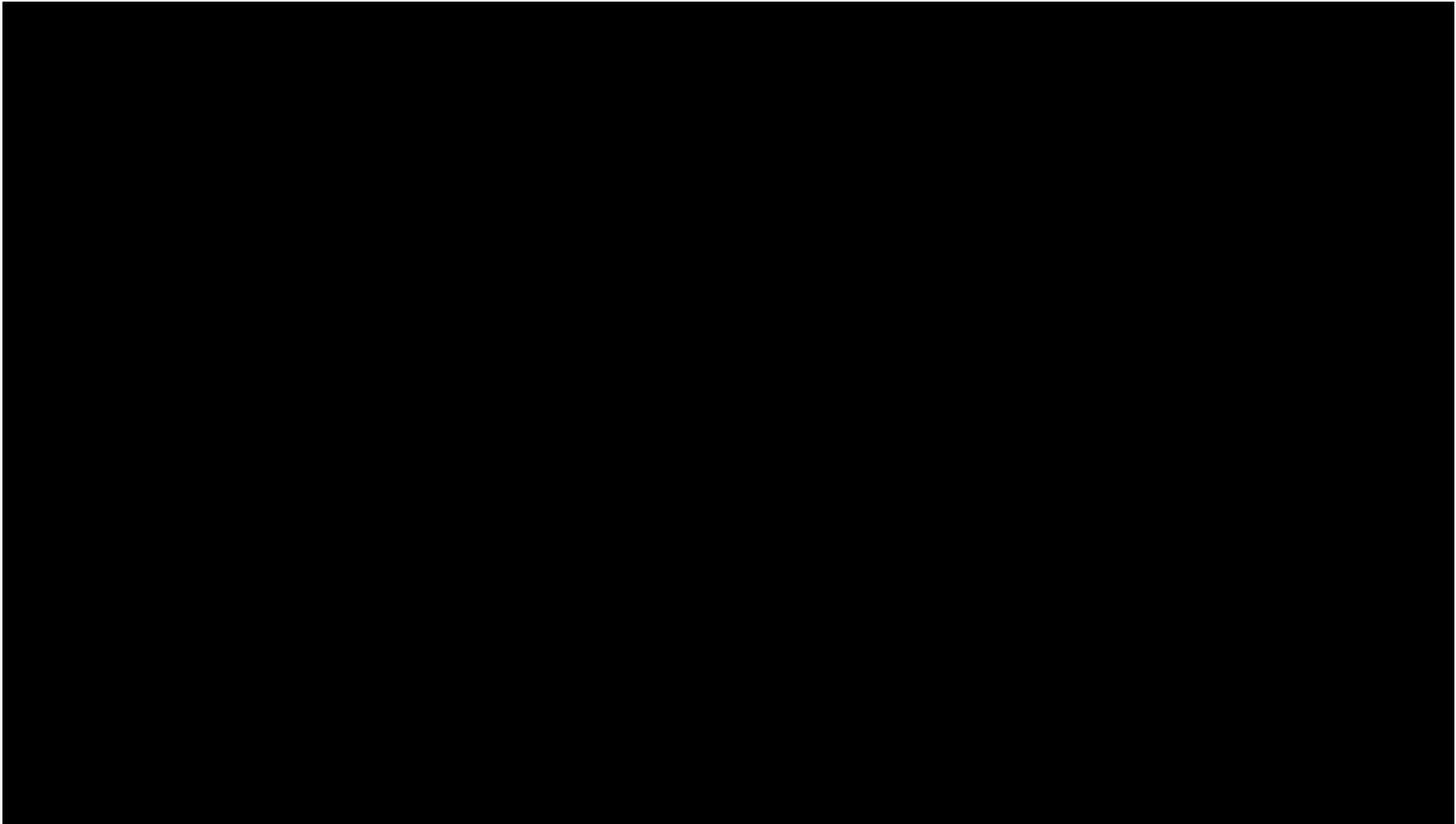


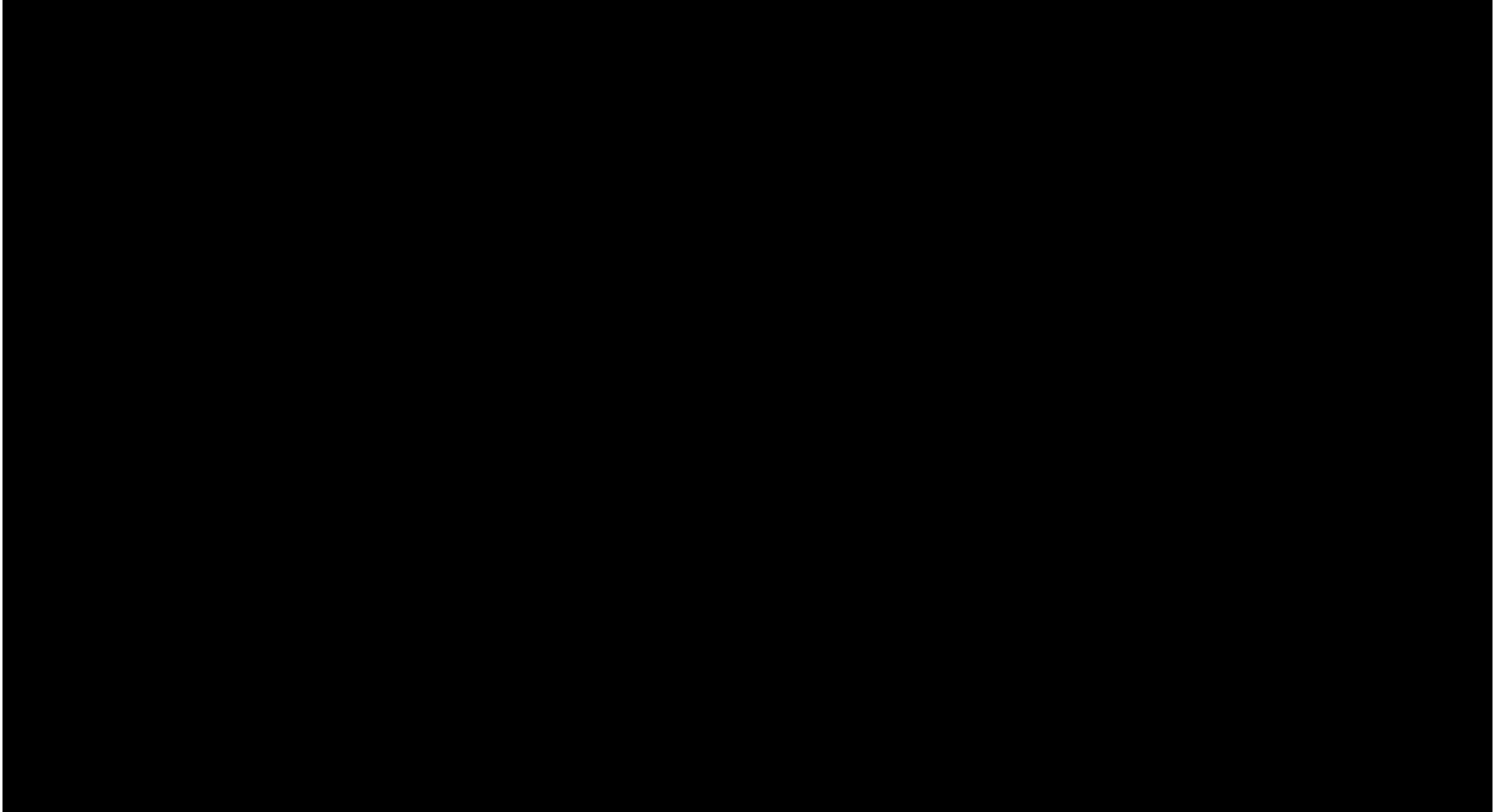


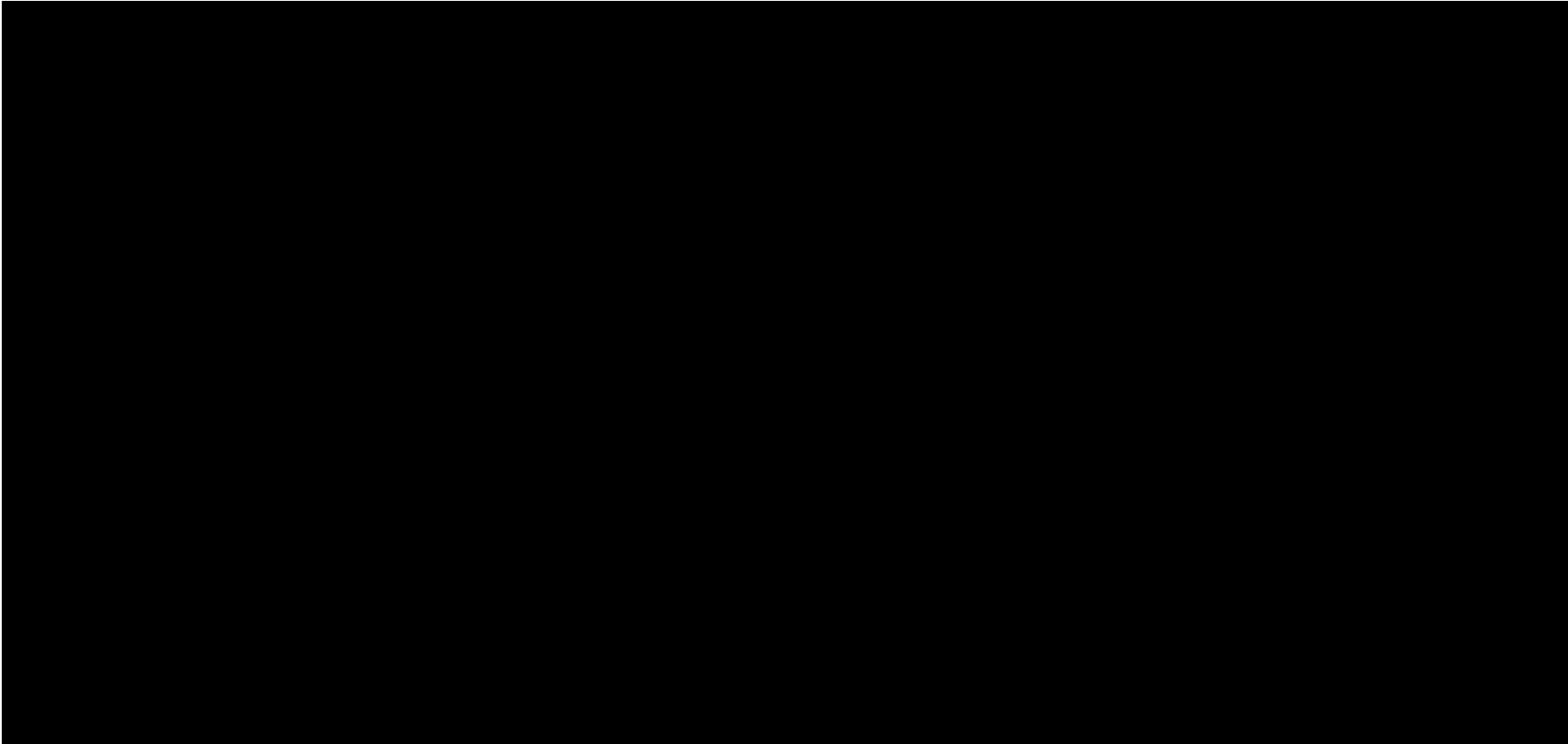


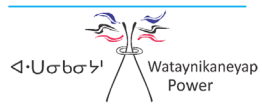
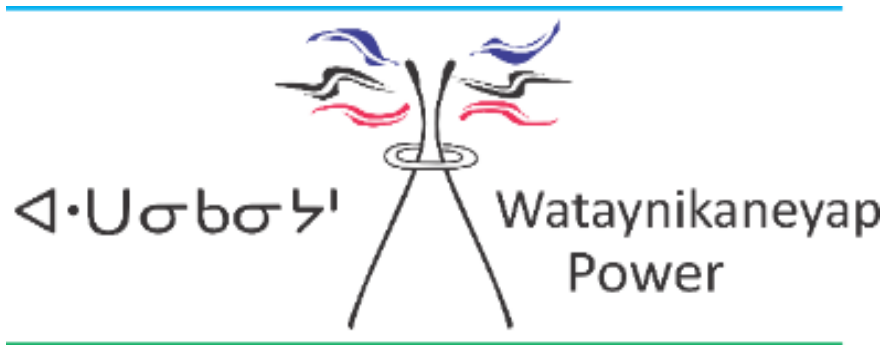












HATCH

Cost Estimate Comparison-Route Change

Register ID	ID-18
RFI Number	RFI-0169
Segment	JI

Previous Alignment Proposed by Valard

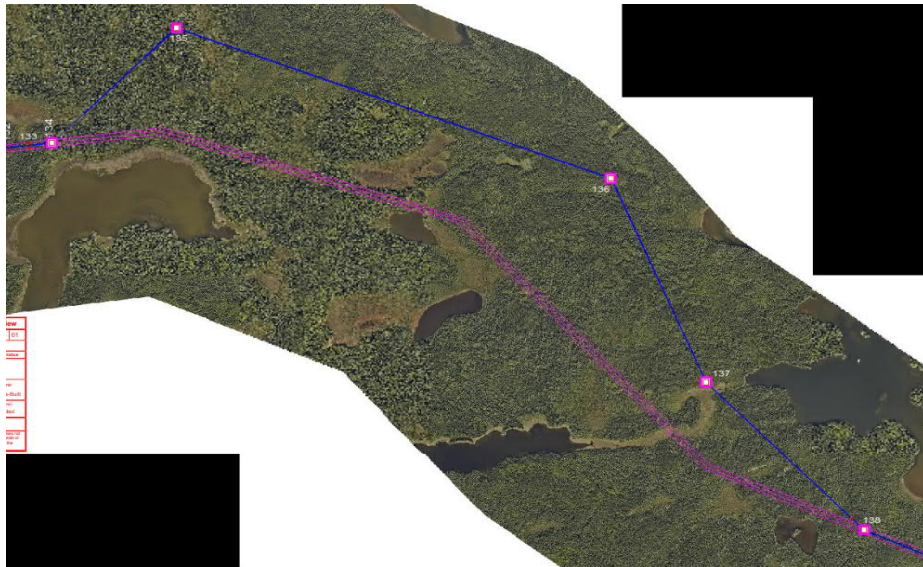
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
A-frame 1	A-frame	707181.197	5878978.462	267.024	44.96		
1	H-frame DDE	707308.057	5878962.488	269	127.86	13.08	
2	Tangent	707418.874	5878948.533	269.063	111.69		
3	Tangent	707531.119	5878934.399	270.019	113.13		
4	Tangent	707650.828	5878919.325	268.571	120.65		
5	Tangent	707754.977	5878906.21	268.295	104.97		
6	Tangent	707899.191	5878888.051	269.417	145.35		
7	Tangent	708014.818	5878873.491	270.591	116.54		
8	Tangent	708156.88	5878855.602	268.894	143.18		
9	Tangent	708291.586	5878838.639	271.554	135.77		
10	Tangent	708380.849	5878827.399	272.305	89.97	17.43	

Item	Description	Unit	Qty	Material/ Equipment	Construction	Unit Total	Total
C.1	Clearing RoW	km	4.8303				
C.2	Timber management of above	km	2.9711				
C.5	Clearing off-RoW access	km	0.0729				
C.7	ROW Management	Lump sum	0.0911				
D.1	Winter-only Access	km	5.1493				
D.4	Trail	km	4.9853				
D.11	Access road gates	EA	1.1028				
D.12	Signage	EA	11.0277				
	Lump sum Total for D						
F.14	Average Pole Foundation	Str.	40				
F.15	Average Anchor	Anchor	18				
H.1	44-SP-TANG	Str.	37				
H.4	44-SP-HADE	Str.	3				
J.1	Counterpoise	km	5.0126				
J.4	1-pole structure	Str	40				
M.1	OPGW&ADSS accessories - Vibration Damper	EA	80				
N.1c	Conductor Stringing 44kV - 477 ACSR Hawk	cct-km	5.0126				
P.1b	OPGW Stringing 44kV - 96 fibre	km	5				

Re-Alignment Vs Previous Alignment Proposed By Watay

Re-Alignment-Proposed by Valard

A-frame 1	A-frame				44.96		
1	H-frame DDE	707308.057	5878962.488	269	147	13.08	
2	Light angle (l)	707418.874	5878948.533	269.063	111.69	-13.08	
3	Tangent	707531.119	5878934.399	270.019	113.13		
4	Tangent	707650.828	5878919.325	268.571	120.65		
5	Tangent	707754.977	5878906.21	268.295	104.97		
6	Tangent	707899.191	5878888.051	269.417	145.35		
7	Tangent	708014.818	5878873.491	270.591	116.54		
8	Tangent	708156.88	5878855.602	268.894	143.18		
9	Tangent	708291.586	5878838.639	271.554	135.77		
10	Tangent	708380.849	5878827.399	272.305	89.97	17.43	
11	Light angle (R)				125.84		
Item	Description	Unit	Qty	Material/ Equipment	Construction	Unit Total	Total
A.1	Design and Engineering	Lump sum	0				
C.1	Clearing RoW	km	6				
C.2	Timber management of above	km	3				
C.5	Clearing off-RoW access	km	0				
C.7	ROW Management	Lump sum	0				
D.1	Winter-only Access	km	6				
D.4	Trail	km	6				
D.11	Access road gates	EA	1				
D.12	Signage	EA	13				
F.14	Average Pole Foundation	Str.	46				
F.15	Average Anchor	Anchor	30				
H.1	44-SP-TANG	Str.	41				
H.4	44-SP-HADE	Str.	5				
J.1	Counterpoise	km	5.7705				
J.4	1-pole structure	Str	46				
M.1	OPGW&ADSS accessories - Vibration Damper	EA	92				
N.1c	Conductor Stringing 44kV - 477 ACSR Hawk	cct-km	5.7705				
P.1b	OPGW Stringing 44kV - 96 fibre	km	5.7705				



Cost Estimate Comparison-Route Change

Register ID	26
RFI Number	RFI-0322
Segment	EF

Previous Alignment Provided By Valard

Structure Number	Station (m)	X Easting Centerline (m)	Y Northing Centerline (m)	Z Elevation Centerline (m)	Ahead Span (m)	Line Angle (deg)	Structure Type
152	57012.574	627544.644	5973580.211	242.82	423.255		W1A
153	57435.829	627918.492	5973778.66	239.904	363.909		W1A
154	57799.738	628239.923	5973949.284	236.434	393.84		W1A
155	58193.578	628587.79	5974133.941	231.082	404.926		W1A
156	58598.504	628945.449	5974323.796	242.424	327.785		W1B
157	58926.289	629234.971	5974477.483	251.483	305.712	-74.1339	W1E
158	59232.001	629170.917	5974776.409	236.288	381.77		W1A
159	59613.771	629090.927	5975149.705	232.334	405.42		W1A
160	60019.191	629005.982	5975546.126	238.693	340.971		W1A
161	60360.162	628934.54	5975879.529	236.566	346.091		W1A
162	60706.253	628862.025	5976217.938	233.987	282.485		W1A
163	60988.737	628802.838	5976494.152	231.704	279.005	52.1546	W1E

Coste Estimate-Previous Alignment

Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	4.3	
Access			per Str	12	
Foundation (W1A)	Normal Instalation		per Str	9	
Foundation (W1B)	Normal Instalation		per Str	1	
Foundation (W1C)	Normal Instalation		per Str		
Foundation (W1D)	Normal Instalation		per Str		
Foundation (W1E)	Normal Instalation		per Str	2	
Foundation Heli (W1A)			per Str		
Foundation Heli (W1B)			per Str		
Foundation Heli (W1C)			per Str		
Foundation Heli (W1D)			per Str		
Foundation Heli (W1E)			per Str		
Str. Assembly (W1A)	Normal Instalation		per Str	9	
Str. Assembly (W1B)	Normal Instalation		per Str	1	
Str. Assembly (W1C)	Normal Instalation		per Str		
Str. Assembly (W1D)	Normal Instalation		per Str		
Str. Assembly (W1E)	Normal Instalation		per Str	2	
Str. Assembly Heli (W1A)			per Str		
Str. Assembly Heli (W1B)			per Str		
Str. Assembly Heli (W1C)			per Str		
Str. Assembly Heli (W1D)			per Str		
Str. Assembly Heli (W1E)			per Str		
Grounding			per Str	12	
Dampers			per Str	12	
OPGW Accessories			per Str	12	
OPGW Installation & Testing			per km	4.3	
Conductor Installation			per km	4.3	
Structure Accessories			per Str	12	
Total				Total=	

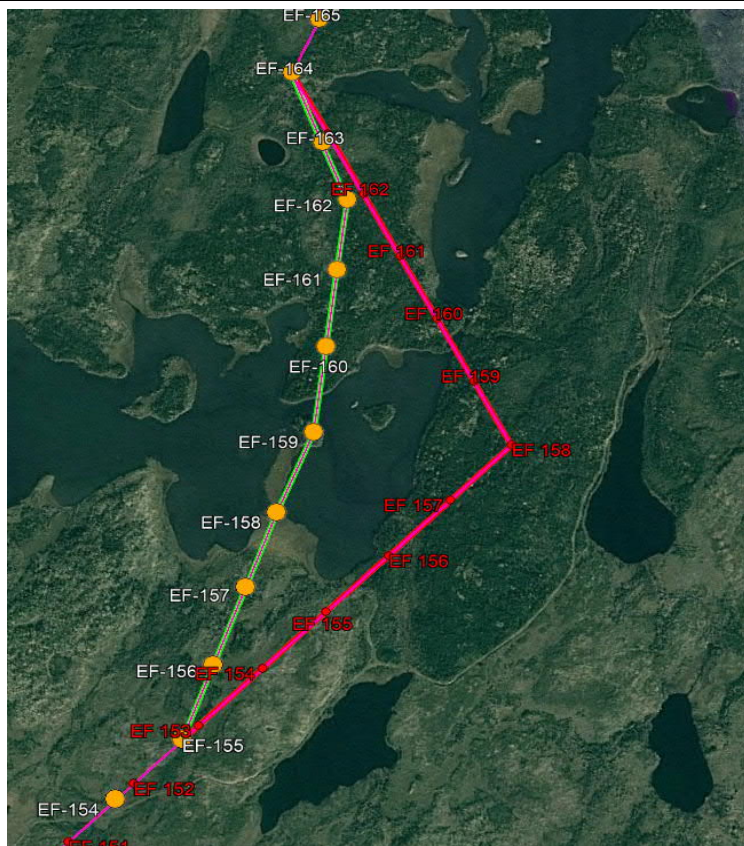
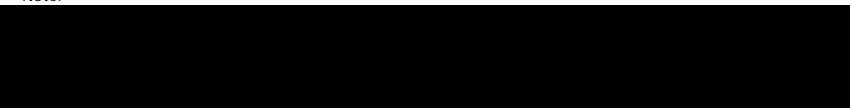
Previous Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z	Ahead Span (m)	Line Angle (deg)	Structure
CEF-155	57080.515	627544.306	5973580.02	242.824	352.279	-26.096	W1D
CEF-156	57432.794	627751.089	5973865.224	237.084	375.162		W1A
CEF-157	57807.956	627971.304	5974168.954	229.923	364.387		W1A
CEF-158	58172.343	628185.194	5974463.96	229.802	403.049	2.3357	W1D
CEF-159	58575.392	628434.88	5974780.354	231.466	407.541	-15.3729	W1D
CEF-160	58982.933	628593.505	5975155.757	230.716	370.241		W1A
CEF-161	59353.174	628737.612	5975496.802	229.908	343.282		W1A
CEF-162	59696.095	628871.085	5975812.681	234.344	308.941	-28.6547	W1C
CEF-163	60004.673	628840.177	5976119.708	235.913	376.142		W1A
CEF-164	60386.283	628802.502	5976493.958	231.66	289.006	45.8086	W1E

Coste Estimate-Re-Alignment

Item	Tower Type	Average Price	Unit	Quantity	Cost	Column1
RoW Clearing			per km	3.6		
Access			per Str	10		
Foundation (W1A)	Normal Instalation		per Str	5		
Foundation (W1B)	Normal Instalation		per Str			
Foundation (W1C)	Normal Instalation		per Str	1		
Foundation (W1D)	Normal Instalation		per Str	3		
Foundation (W1E)	Normal Instalation		per Str	1		
Foundation Heli (W1A)			per Str			
Foundation Heli (W1B)			per Str			
Foundation Heli (W1C)			per Str			
Foundation Heli (W1D)			per Str			
Foundation Heli (W1E)			per Str			
Str. Assembly (W1A)	Normal Instalation		per Str	5		
Str. Assembly (W1B)	Normal Instalation		per Str			
Str. Assembly (W1C)	Normal Instalation		per Str	1		
Str. Assembly (W1D)	Normal Instalation		per Str	3		
Str. Assembly (W1E)	Normal Instalation		per Str	1		
Str. Assembly Heli (W1A)			per Str			
Str. Assembly Heli (W1B)			per Str			
Str. Assembly Heli (W1C)			per Str			
Str. Assembly Heli (W1D)			per Str			
Str. Assembly Heli (W1E)			per Str			
Grounding			per Str	10		
Dampers			per Str	10		
OPGW Accessories			per Str	10		
OPGW Installation & Testing			per km	3.6		
Conductor Installation			per km	3.6		
Structure Accessories			per Str	10		
Total				Total=		
Cost Difference						

Note:



Cost Estimate Comparison-Route Change

Register ID	24
RFI Number Segment	RFI-0305 & RFI-202 QR

Previous Alignment Provided By Valard

Structure Number	Station (m)	X Easting Centerline (m)	Y Northing Centerline (m)	Z Elevation Centerline (m)	Ahead Span (m)	Line Angle (deg)	Structure Type
2	83.592	442425.393	5735852.63	343.775	132.929	-44.7939	W1D
3	216.521	442555.057	5735881.911	341.657	244.237	8.4498	W1B
4	460.759	442798.615	5735900.119	340.129	225.181	5.1832	W1B
5	685.939	443023.767	5735896.551	338.995	225.18		W1A
6	911.12	443248.919	5735892.984	338.165	312.612	-11.506	W1B
7	1223.732	443556.198	5735950.48	334.329	335.893	-27.7046	W1C
8	1559.625	443819.789	5736158.673	337.643	210.583		W1A
9	1770.208	443985.044	5736289.196	339.998	244.882	-32.5938	W1D
10	2015.09	444065.187	5736520.592	349.369	226.085	26.8585	W1D

Coste Estimate-Previous Alignment

Total	Installation Type	Average Price	Unit	Quantity	Cost
Access			per Str		
Foundation (W1A)	Normal Instalation		per Str	2	
Foundation (W1B)	Normal Instalation		per Str	3	
Foundation (W1C)	Normal Instalation		per Str	1	
Foundation (W1D)	Normal Instalation		per Str	3	
Foundation (W1E)	Normal Instalation		per Str		
Foundation Heli (W1A)			per Str		
Foundation Heli (W1B)			per Str		
Foundation Heli (W1C)			per Str		
Foundation Heli (W1D)			per Str		
Foundation Heli (W1E)			per Str		
Str. Assembly (W1A)	Normal Instalation		per Str	2	
Str. Assembly (W1B)	Normal Instalation		per Str	3	
Str. Assembly (W1C)	Normal Instalation		per Str	1	
Str. Assembly (W1D)	Normal Instalation		per Str	3	
Str. Assembly (W1E)	Normal Instalation		per Str		
Str. Assembly Heli (W1A)			per Str		
Str. Assembly Heli (W1B)			per Str		
Str. Assembly Heli (W1C)			per Str		
Str. Assembly Heli (W1D)			per Str		
Str. Assembly Heli (W1E)			per Str		
Grounding			per Str		
Dampers			per Str		
OPGW Accessories			per Str		
OPGW Installation & Testing			per km	1.972	
Conductor Installation			per km	1.972	
Structure Accessories			per Str	9	
Total			Total=		

Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
1	116.147	442463.005	5735841.151	342.739	305.579	-37.0333	W1E
2	421.726	442768.049	5735859.228	339.758	307.089		W1A
3	728.815	443074.6	5735877.394	339.681	317.544		W1A
4	1046.359	443391.588	5735896.178	277.25	263.652	-22.2309	W1D
5	1310.012	443629.314	5736010.191	334.677	287.17	-12.5358	W1D
6	1597.182	443855.119	5736187.614	338.299	164.606		W1A
7	1761.788	443984.551	5736289.313	340.009	245.222	-32.7386	W1D
8	2006.67	444064.694	5736520.709	349.346	226.426	26.8586	W1C

Coste Estimate-Re-Alignment						
Item	Tower Type	Average Price	Unit	Quantity	Cost	
RoW Clearing			per km	1.969		
Access			per Str			
Foundation (W1A)	Normal Instalation		per Str	3		
Foundation (W1B)	Normal Instalation		per Str			
Foundation (W1C)	Normal Instalation		per Str	1		
Foundation (W1D)	Normal Instalation		per Str	3		
Foundation (W1E)	Normal Instalation		per Str	1		
Foundation Heli (W1A)			per Str			
Foundation Heli (W1B)			per Str			
Foundation Heli (W1C)			per Str			
Foundation Heli (W1D)			per Str			
Foundation Heli (W1E)			per Str			
Str. Assembly (W1A)	Normal Instalation		per Str	3		
Str. Assembly (W1B)	Normal Instalation		per Str			
Str. Assembly (W1C)	Normal Instalation		per Str	1		
Str. Assembly (W1D)	Normal Instalation		per Str	3		
Str. Assembly (W1E)	Normal Instalation		per Str	1		
Str. Assembly Heli (W1A)			per Str			
Str. Assembly Heli (W1B)			per Str			
Str. Assembly Heli (W1C)			per Str			
Str. Assembly Heli (W1D)			per Str			
Str. Assembly Heli (W1E)			per Str			
Grounding			per Str			
Dampers			per Str			
OPGW Accessories			per Str			
OPGW Installation & Testing			per km	1.97		
Conductor Installation			per km	1.969		
Structure Accessories			per Str			
Total				Total=		
Cost Difference						

Note:

This estimate has been revised according to the following informatino provided by Valard;



Cost Estimate Comparison Route Change

Register ID	8
RFI Number	RFI-
Segment	AB

1. Previous Route Alignment Provided by Valard

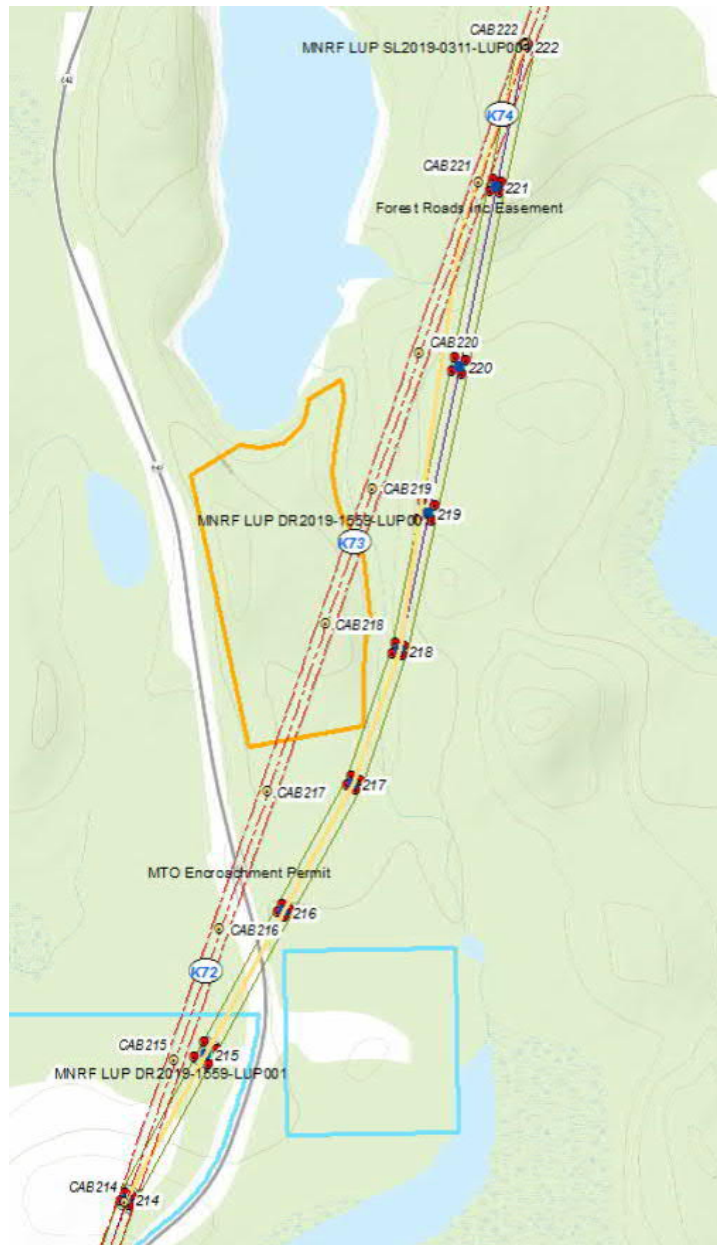
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
CAB213	K71.1	593794.74	5540466.79	361.53			W2A
CAB214	K71.5	593920.04	5540805.91	331.25			W2A
CAB215	K71.8	594034.84	5541116.63	307.23			W2A
CAB216	K72.1	594141.31	5541404.83	320.15			W2A
CAB217	K72.4	594252.27	5541705.14	392.02			W2A
CAB218	K72.8	594388.13	5542072.87	315.46			W2A
CAB219	K73.1	594497.46	5542368.78	315.99			W2A
CAB220	K73.5	594606.97	5542665.19	400.51			W2A
CAB221	K73.9	594745.77	5543040.87	317.75			W2A
CAB222	K74.2	594855.89	5543338.93				W2D

Coste Estimate-Previous Alignment					
	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km		
Access			per Str	10	
Foundation W2A	W2A		per Str	9	
Foundation W2B	W2B		per Str		
Foundation W2D/W2E	W2D		per Str	1	
Foundation W2D/W2E	W2E		per Str		
Str. Assembly W2A	W2A		per Str	9	
Str. Assembly W2B	W2B		per Str		
Str. Assembly W2D	W2D		per Str	1	
Str. Assembly W2E	W2E		per Str		
Grounding			per Str	10	
Dampers			per Str	10	
OPGW Accessories			per Str	10	
OPGW Installation & Testing			per km		
Conductor Installation			per km		
Structure Accessories			per Str	10	
Total					

2. Re-Alignment Provided By Hatch

Re-Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
CAB213		593794.742	5540466.79	370.62			W2A
CAB214		593923.186	5540814.44	350.94	9.9106		W2B
CAB215				350.94			W2A
CAB216				350.94			W2A
CAB217		594452.588	5541724.48	310.76	-10.2092		W2B
CAB218		594558.767	5542016.54	304.56	-11.0301		W2B
CAB219		594700.889	5542919.09	304.56			W2A
CAB220		594855.891	5543338.93	304.56			W2A
CAB221		5542919.093		223.77	11.3154		W2B
CAB221A				223.77			W2D
CAB222		5543338.927					

Re-Alignment Provided By Valard



Coste Estimate-Re-Alignment					
	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	0.0	
Access			per Str	10	
Foundation W2A	W2A		per Str	5	
Foundation W2B	W2B		per Str	4	
Foundation W2D/W2E	W2D		per Str	1	
Foundation W2D/W2E	W2E		per Str		
Str. Assembly W2A	W2A		per Str	5	
Str. Assembly W2B	W2B		per Str	4	
Str. Assembly W2D	W2D		per Str	1	
Str. Assembly W2E	W2E		per Str		
Grounding			per Str	10	
Dampers			per Str	10	
OPGW Accessories			per Str	10	
OPGW Installation & Testing			per km	0.0	
Conductor Installation			per km	0.0	
Structure Accessories			per Str	10	
				Total	
				Cost Difference	

3. Cost Comparison



Cost Estimate Comparison-Route Change

Register ID	9						
RFI Number	RFI-0331						
Segment	EG						
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
189	72629.36	543165.692	5971993.918	280.623	316.676		W1A
190	72946.036	543325.738	5972267.174	283.407	326.34		W1A
191	73272.376	543490.668	5972548.769	282.11	389.968	1.6768	W1A
192	73662.343	543697.517	5972879.357	276.871	373.794		W1A
193	74036.138	543895.788	5973196.234	265.534	422.244		W1A
194	74458.382	544119.758	5973554.183	270.785	400.074		W1A
195	74858.455	544331.967	5973893.337	275.341	353.91		W1A
196	75212.365	544519.691	5974193.358	280.774	378.063		W1A
197	75590.428	544720.225	5974513.853	282.556	379.38		W1A
198	75969.808	544921.459	5974835.465	288.952	357.614		W1A
199	76327.423	545111.147	5975138.626	288.945	337.673	-14.0473	W1B
200	76665.095	545215.421	5975459.796	278.548	372.966		W1A
201	77038.061	545330.593	5975814.533	279.36	311.759		W1A
202	77349.82	545426.865	5976111.056	279.621	328.295		W1A
203	77678.116	545528.243	5976423.306	275.511	330.796	26.3225	W1C
204	78008.912	545759.315	5976660.016	278.176	338.252		W1A
205	78347.164	545995.596	5976902.061	269.98	313.204	47.8114	W1E
206	78660.367	546308.585	5976890.469	269.119	342.496		W1A
207	79002.863	546650.847	5976877.794	268.229	345.13		W1A
208	79347.994	546995.74	5976865.021	270.388	348.561		W1A
209	79696.555	547344.063	5976852.121	269.333	276		W1A
210	79972.555	547619.874	5976841.906	268.861	291	52.3073	W1E
211	80263.555	547789.155	5976605.21	267.74	385.966		W1A
212	80649.522	548013.68	5976291.27	266.793	395.188		W1A
213	81044.709	548243.569	5975969.829	265.793	368.275		W1A
214	81412.985	548457.803	5975670.278	263.854	392.48	-10.762	W1B
215	81805.465	548741.713	5975399.287	262.69	362.255		W1A
216	82167.72	549003.758	5975149.166	260.658	360.938		W1A
217	82528.658	549264.851	5974899.954	257.117	366.207		W1A
218	82894.865	549529.756	5974647.103	259.297	352.47		W1A
219	83247.335	549784.723	5974403.738	259.703	408.195	-4.477	W1B
220	83655.53	550101.1	5974145.806	261.126	397.822		W1A
221	84053.352	550409.436	5973894.428	259.8	408.338		W1A
222	84461.69	550725.924	5973636.405	257.558	422.925	-14.1887	W1B

Coste Estimate-Previous Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	12.26	
Access			per Str	34	
Foundation (W1A)	Normal Instalation		per Str	27	
Foundation (W1B)	Normal Instalation		per Str	4	
Foundation (W1C)	Normal Instalation		per Str	1	
Foundation (W1D)	Normal Instalation		per Str		
Foundation (W1E)	Normal Instalation		per Str	2	
Str. Assembly (W1A)	Normal Instalation		per Str	27	
Str. Assembly (W1B)	Normal Instalation		per Str	4	
Str. Assembly (W1C)	Normal Instalation		per Str	1	
Str. Assembly (W1D)	Normal Instalation		per Str		
Str. Assembly (W1E)	Normal Instalation		per Str	2	
Grounding			km	12.26	
Dampers			per Str	34	
OPGW Accessories			per Str	34	
OPGW Installation & Testing			per km	12.26	
Conductor Installation			per km	12.26	
Structure Accessories			per Str	34	
Total=					

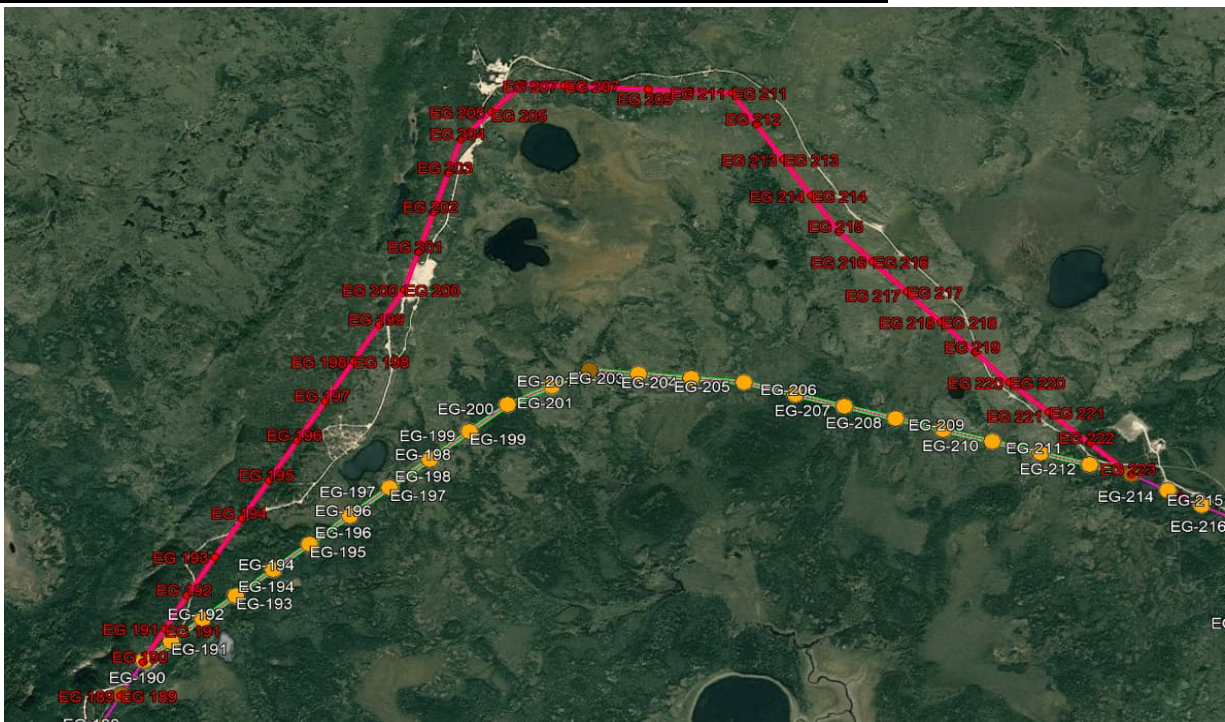
Re-alignment Provided by Valard on 2020-11-17 for Re-route 3

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
190	73322.193	543167.768	5971997.92	280.632	262.631	21.2695	W1C
191	73584.552	543373.454	5972160.787	282.751	305.596		W1A
192	73890.148	543613.037	5972350.495	286.418	315.299		W1A
193	74205.447	543860.227	5972546.225	269.489	358.594		W1A
194	74564.041	544141.36	5972768.833	268.44	347.177		W1A
195	74911.218	544413.542	5972984.353	264.149	391.459		W1A
196	75302.677	544720.441	5973227.362	258.972	383.301		W1A
197	75685.978	545020.943	5973465.307	259.537	389.688		W1A
198	76075.666	545326.453	5973707.216	260.742	384.374		W1A
199	76460.04	545627.797	5973945.827	261.607	370.204		W1A
200	76830.243	545918.032	5974175.642	263.928	375.1	12.9887	W1B
201	77205.344	546256.917	5974336.442	262.054	318.474		W1A
202	77523.818	546544.644	5974472.968	260.831	378.946	29.7363	W1D
203	77902.764	546922.497	5974444.212	261.579	409.191		W1A
204	78311.955	547330.508	5974413.161	260.504	408.135		W1A
205	78720.089	547737.466	5974382.191	257.622	408.345	9.6648	W1B
206	79128.435	548133.653	5974283.287	259.72	390.972		W1A
207	79519.407	548512.984	5974188.59	257.189	408.427		W1A
208	79927.834	548909.249	5974089.667	255.14	377.718		W1A
209	80305.552	549275.721	5973998.181	255.297	391.125		W1A
210	80696.677	549655.2	5973903.448	255.879	384.488		W1A
211	81081.165	550028.24	5973810.322	256.042	388.778		W1A
212	81469.943	550405.442	5973716.157	259.939	329.948		W1A
213	81799.891	550725.566	5973636.242	257.563	309.091	10.9838	W1B

Cost Estimate-Re-Alignment					
	Tower Type	Average Price	Unit	Quantity	Cost
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	8.79	
Access			per Str	24	
Foundation (W1A)	Normal Instalation		per Str	19	
Foundation (W1B)	Normal Instalation		per Str	3	
Foundation (W1C)	Normal Instalation		per Str	1	
Foundation (W1D)	Normal Instalation		per Str	1	
Foundation (W1E)	Normal Instalation		per Str		
Str. Assembly (W1A)	Normal Instalation		per Str	19	
Str. Assembly (W1B)	Normal Instalation		per Str	3	
Str. Assembly (W1C)	Normal Instalation		per Str	1	
Str. Assembly (W1D)	Normal Instalation		per Str	1	
Str. Assembly (W1E)	Normal Instalation		per Str		
Grounding			per km	8.79	
Dampers			per Str	24	
OPGW Accessories			per Str	24	
OPGW Installation & Testing			per km	8.79	
Conductor Installation			per km	8.79	
Structure Accessories			per Str	24	
				Total=	
				Difference	

-221914.5

3. Cost Comparison



Cost Estimate Comparison-Route Change

Register ID	50 (CCR-033)						
RFI Number	RFI-0201						
Segment	BC						
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
WBC-110					251	21.35	W1D
WBC-111					340		W1A
WBC-112					296		W1A
WBC-113					233	0	W1A
WBC-114					207	29.39	W1D
WBC-115					273	-	W1A
WBC-116					323		W1A
WBC-117					292	18.72	W1D

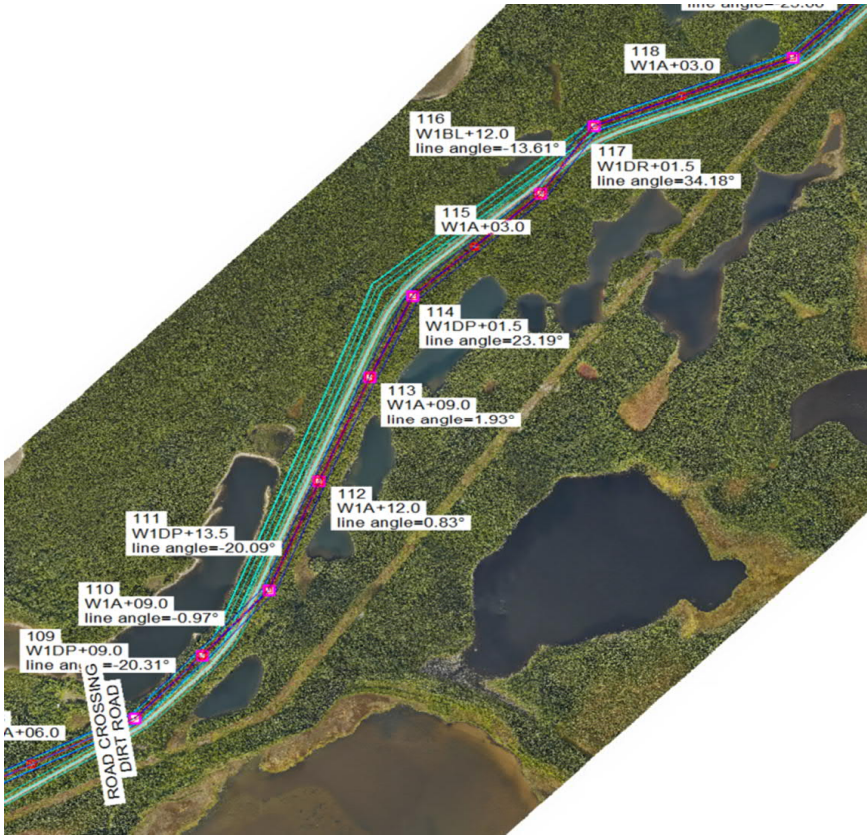
Coste Estimate-Previous Alignment

	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	2.5	
Access			per Str	8	
Foundation (W1A)	W1A		per Str	5	
Foundation (W1B)	W1B		per Str	0	
Foundation (W1D/W1E)	W1D		per Str	3	
Foundation (W1D/W1E)	W1E		per Str	0	
Str. Assembly (W1A)	W1A		per Str	5	
Str. Assembly (W1B)	W1B		per Str	0	
Str. Assembly (W1D)	W1D		per Str	3	
Str. Assembly (W1E)	W1E		per Str	0	
Grounding			per Str	8	
Dampers			per Str	8	
OPGW Accessories			per Str	8	
OPGW Installation & Testing			per km	2.5	
Conductor Installation			per km	2.5	
Structure Accessories			per Str	8	
Total					

Re-Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
WBC-110	40564.495	345.606	345.606	133.38	309.937	-	W1A
WBC-111	40874.432	348.795	348.795	123.63	410.933	-19.503	W1D
WBC-112	41285.365	351.667	351.667	113.88	399	-	W1A
WBC-113	41684.365	357.041	357.041	113.88	316.222	0	W1A
WBC-114	42000.587	362.593	362.593	126.32	260.018	24.887	W1D
WBC-115	42260.605	358.789	358.789	138.77	278.948	-	W1A
WBC-116	42539.553	358.249	358.249	131.96	289.783	-13.609	W1B
WBC-117	42829.336	360.335	360.335	142.25	298.027	34.179	W1D

Re-Alignment Vs Previous Alignment Provided by Valard



Coste Estimate-Re-Alignment					
	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	2.6	
Access			per Str	8	
Foundation (W1A)	W1A		per Str	4	
Foundation (W1B)	W1B		per Str	1	
Foundation (W1D/W1E)	W1D		per Str	3	
Foundation (W1D/W1E)	W1E		per Str	0	
Str. Assembly (W1A)	W1A		per Str	4	
Str. Assembly (W1B)	W1B		per Str	1	
Str. Assembly (W1D)	W1D		per Str	3	
Str. Assembly (W1E)	W1E		per Str	0	
Grounding			per Str	8	
Dampers			per Str	8	
OPGW Accessories			per Str	8	
OPGW Installation & Testing			per km	2.6	
Conductor Installation			per km	2.6	
Structure Accessories			per Str	8	
				Total	
				Cost Difference	

Note:

1) Valard has not provided original structure list with RFI. The original structure list is from the below structure list

Job Name:	Wataynikaneyap Power Transmission Project
Subject:	Structure List
Drawing Number:	E353781-LBC01-230-250-0001
Coordinate System:	UTM15N
Horizontal Datum:	NAD83
Date:	11/19/2019

Cost Estimate Comparison-Route Change

Register ID	47 (part of CCR-034)
RFI Number	RFI-0223
Segment	CD

Previous Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
CCD-305	111493.98	611179.977	5852009.63	289.416	414.114	30.7153	W1D
CCD-306	111908.094	611422.911	5852345	289.731	379.351	0	W1A
CCD-307	112287.445	611645.452	5852652.22	293.269	418.986	0	W1A
CCD-308	112706.431	611891.244	5852991.54	290.439	430.152	0	W1A
CCD-309	113136.583	612143.587	5853339.9	292.433	424.112	0	W1A
CCD-310	113560.695	612392.386	5853683.36	293.963	426.892	0	W1A
CCD-311	113987.587	612642.816	5854029.08	291.644	431.471	0	W1A
CCD-312	114419.058	612895.933	5854378.51	293.645	373.435	0	W1A
CCD-313	114792.493	613115.003	5854680.94	303.306	334.64	0	W1A
CCD-314	115126.89	613310.155	5854952.78	300.688	343.892	19.0233	W1C

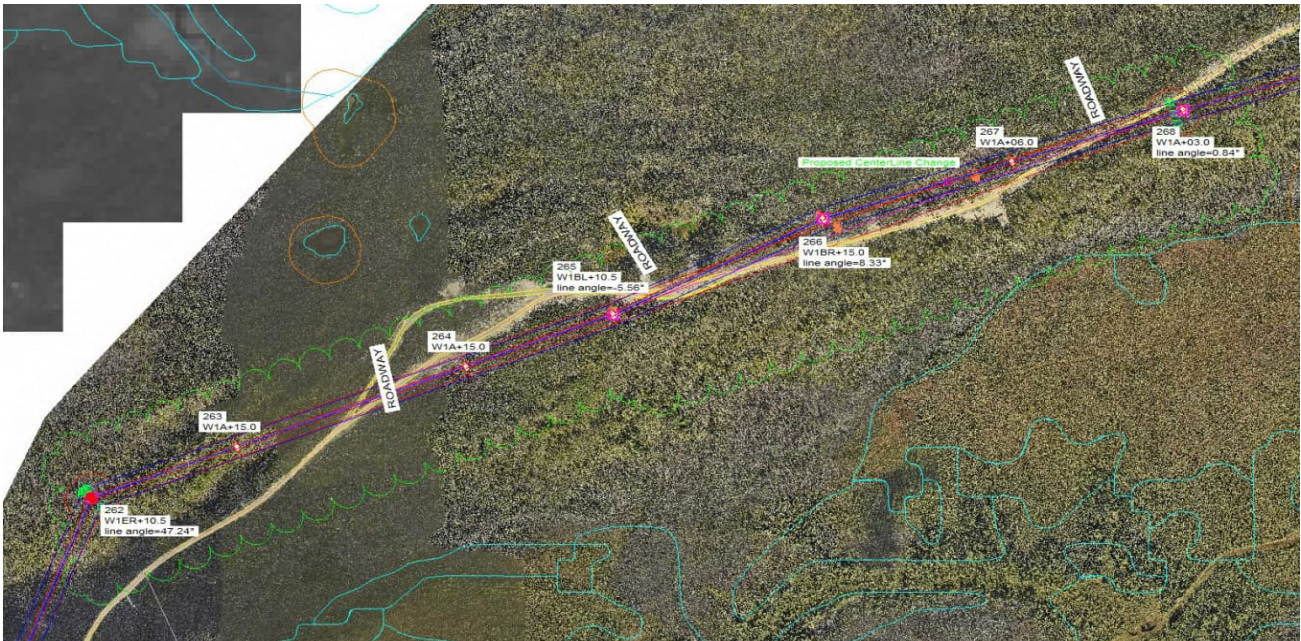
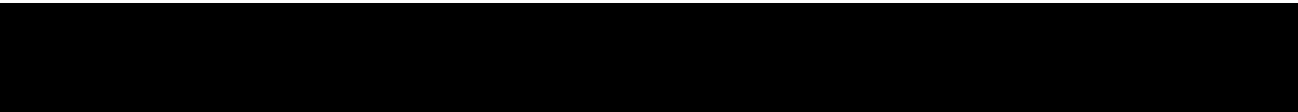
Coste Estimate-Previous Alignment

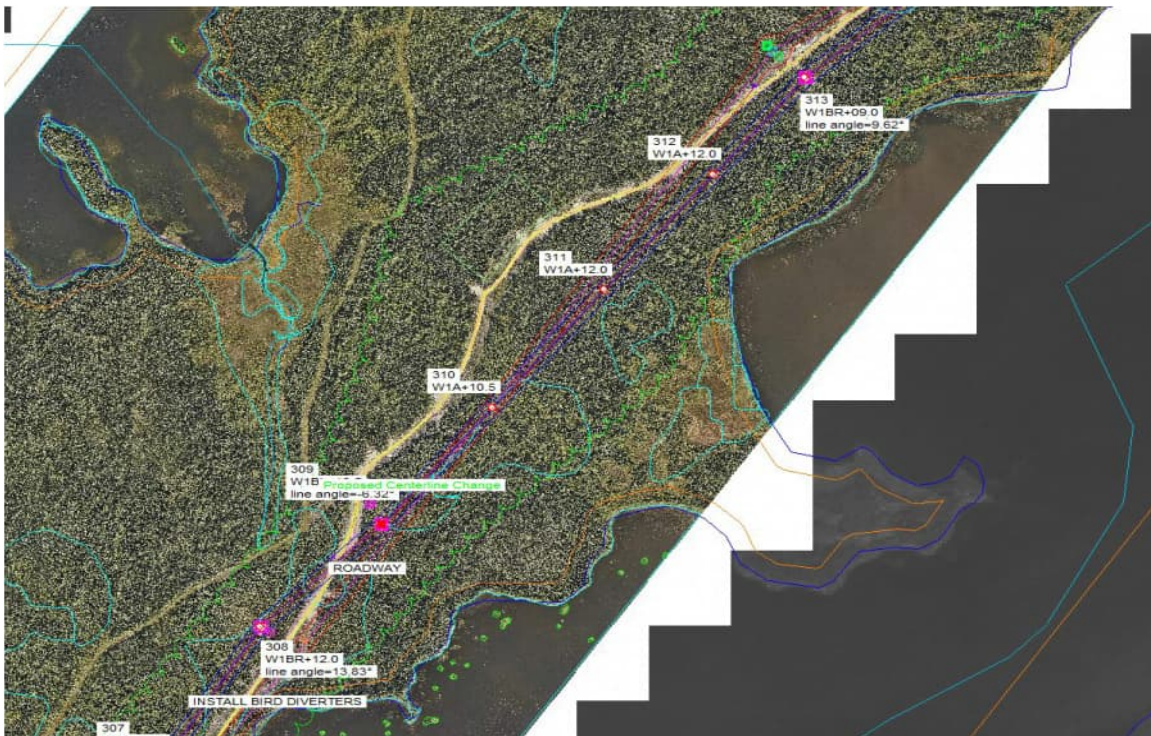
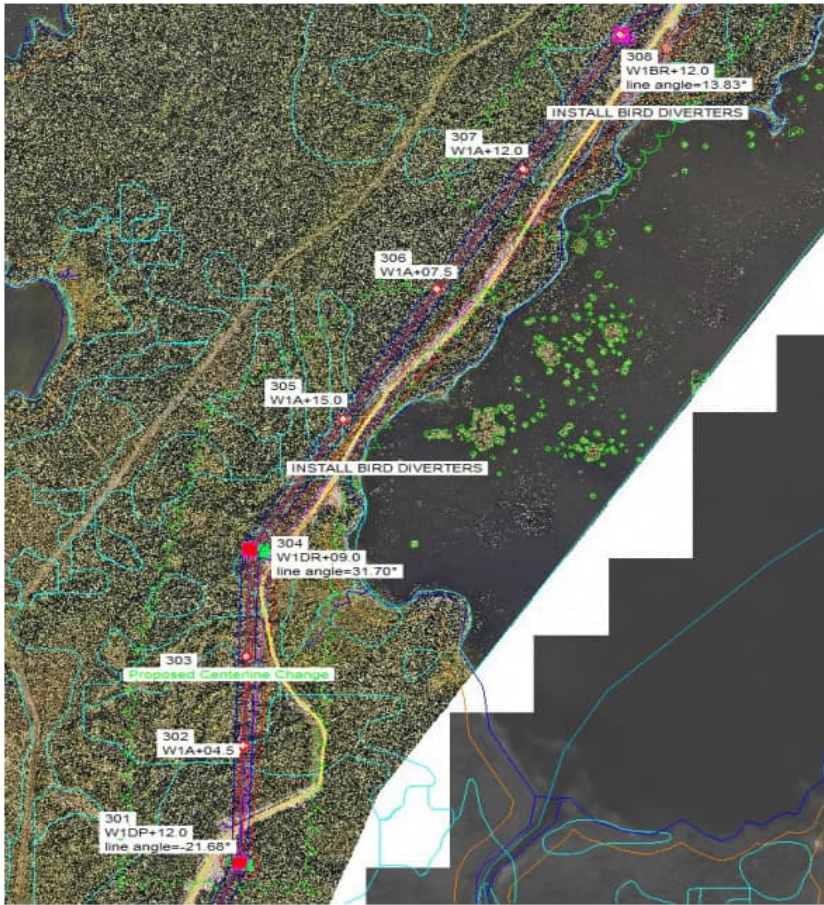
	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	4.0	
Access			per Str	10	
Foundation (W1A)	W1A		per Str	8	
Foundation (W1B)	W1B		per Str	0	
Foundation (W1C)	W1C		per Str	1	
Foundation (W1D/W1E)	W1D		per Str	1	
Foundation (W1D/W1E)	W1E		per Str	0	
Str. Assembly (W1A)	W1A		per Str	8	
Str. Assembly (W1B)	W1B		per Str	0	
Str. Assembly (W1C)	W1C		per Str	1	
Str. Assembly (W1D)	W1D		per Str	1	
Str. Assembly (W1E)	W1E		per Str	0	
Grounding			per Str	10	
Dampers			per Str	10	
OPGW Accessories			per Str	10	
OPGW Installation & Testing			per km	4.0	
Conductor Installation			per km	4.0	
Structure Accessories			per Str	10	
Total					

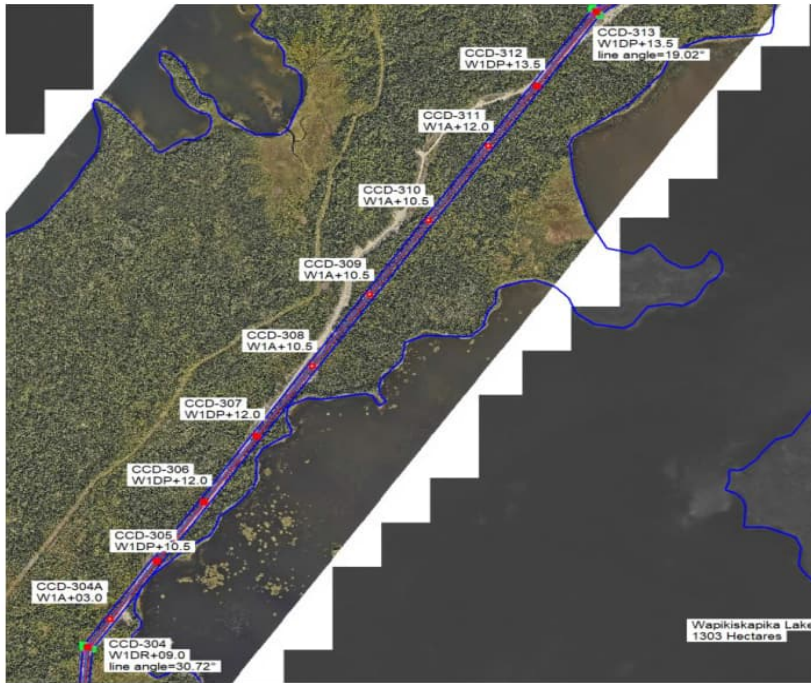
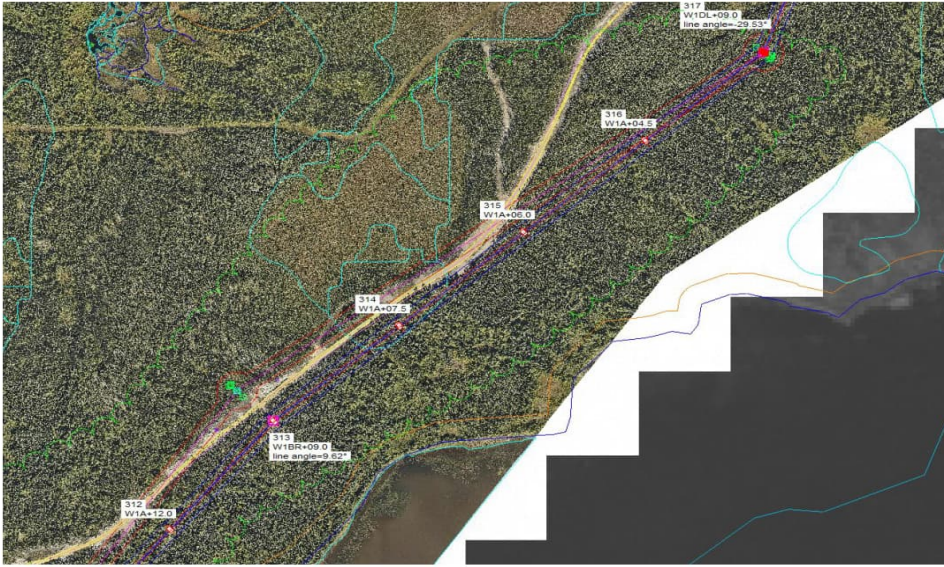
Re-Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
CCD-304	111497.524	611179.977	5852009.63	289.416	244.255	26.2297	W1D
CCD-304A	111741.78	611307.357	5852218.04	289.605	310.921	-0.4146	W1A
CCD-305	112052.701	611467.578	5852484.5	290.423	356.256	9.2115	W1B
CCD-306	112408.957	611697.669	5852756.49	292.705	361.028	-0.4934	W1A
CCD-307	112769.985	611928.459	5853034.12	290.198	433.912	-4.4267	W1B
CCD-308	113203.897	612179.259	5853388.21	293.143	401.531	0.5818	W1A
CCD-309	113605.428	612414.658	5853713.5	293.389	367.169		W1A
CCD-310	113972.597	612629.912	5854010.95	291.44	393.771		W1A
CCD-311	114366.368	612860.762	5854329.96	293.224	357.672	1.807	W1A
CCD-312	114724.04	613079.481	5854612.96	304.107	410.436	-3.3311	W1B
CCD-313	115134.476	613311.172	5854951.75	300.688	380.039	20.5745	W1D

Coste Estimate-Re-Alignment					
	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	4.0	
Access			per Str	11	
Foundation (W1A)	W1A		per Str	6	
Foundation (W1B)	W1B		per Str	3	
Foundation (W1C)	W1C		per Str	0	
Foundation (W1D/W1E)	W1D		per Str	2	
Foundation (W1D/W1E)	W1E		per Str	0	
Str. Assembly (W1A)	W1A		per Str	6	
Str. Assembly (W1B)	W1B		per Str	3	
Str. Assembly (W1C)	W1C		per Str	0	
Str. Assembly (W1D)	W1D		per Str	2	
Str. Assembly (W1E)	W1E		per Str	0	
Grounding			per Str	11	
Dampers			per Str	11	
OPGW Accessories			per Str	11	
OPGW Installation & Testing			per km	4.0	
Conductor Installation			per km	4.0	
Structure Accessories			per Str	11	
	Total			Total=	
				Cost Difference	

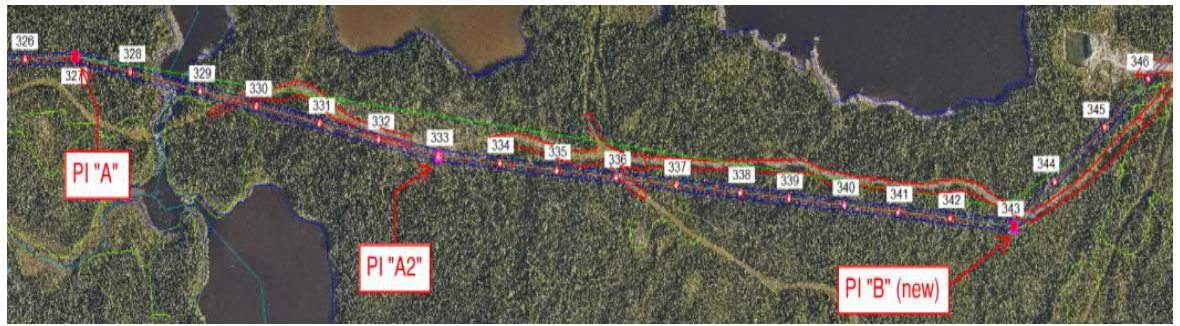






Cost Estimate Comparison - Route Change

Register ID	ID-54						
RFI Number	RFI-0248; CCR-030						
Segment	JI						
Previous Alignment Proposed by Valard							
Description	Unit	Qty	Material/ Equipment	Construction	Unit Cost	Total	
Row Clearing: <i>Including, but not limited to, on and off the RoW. Includes survey and flagging. Includes, but not limited to tree cutting, brush clearing, danger tree cutting, management and disposal of cut trees. Includes cleared till handover of line to Owner. Do not include Camps, laydown areas which should be included in the Group summary. Royalty or stumpage fees should not be included.</i>							
C.1	Clearing RoW	km				2.81	
Foundations and anchors for wood pole structures: <i>Including, but not limited to, survey and staking and all Materials, accessories and activities prior to installation of poles, testing. Excludes pole setting.</i>							
F.1	Foundation Overburden - Direct embed drill in soil 44kV	Str.				0.00	
Foundations and anchors for Lattice Steel structures: <i>Including, but not limited to, survey and staking and all Materials, accessories and activities prior to installation of towers. Excludes tower setting.</i>							
Wood pole structures: <i>Including, but not limited to, all steel items (framing), guy-wires, guy-wire insulators, guy-guards, pole bearing plates (if needed), bonding, down-lead and all accessories (excluding identification plates). Includes factory and field tests and inspections.</i>							
H.1	44-SP-TANG	Str.				0.00	
H.2	44-SP-LANG	Str.				0.0	
H.3	44-SP-MANG	Str.				0.0	
H.4	44-SP-HADE	Str.				0.00	
H.5	44-HF-ACAD	Str.				0.00	
Grounding of structures and Line Counterpoise: <i>Including, but not limited to, all grounding, Ground Enhancement Material and counterpoise items. Includes factory and field</i>							
J.1	Counterpoise	km				2.81	
J.2	2-pole structure	Str.				0.00	
J.3	3-pole structure	Str.				0.0	
J.4	1-pole structure	Str				0.00	
Conventional Shield-wire Fittings and Accessories <i>Including, but not limited to, assemblies, grounding and dampers. Includes damper study. Includes factory and field tests and inspections. Design/Type tests to be quoted as separate line items in below list.</i>							
Conductor and Neutral: <i>Including, but not limited to, conductor and neutral. Includes factory and field tests and inspections. Design/Type tests to be quoted as separate line items in below list.</i>							
N.1c	Conductor Stringing 44kV - 477 ACSR Hawk	cct-km				2.81	
Conventional Shield-wire: <i>Including, but not limited to, shield-wire. Includes factory and field tests and inspections. Design/Type tests to be quoted as separate line items in below list.</i>							
p.1a	OPGW Stringing 115kV - 96 fibre	km				0.0	
p.1b	OPGW Stringing 44kV - 96 fibre	km				2.81	
p.2	ADSS Stringing 25kV - 96 fibre	km				0.0	
Final Completion: Receipt of Final Completion Certificate							
GRAND TOTAL							
New Alignment Proposed by Valard							
Description	Unit	Qty	Material/ Equipment	Construction	Unit Cost	Total	
Row Clearing: <i>Including, but not limited to, on and off the RoW. Includes survey and flagging. Includes, but not limited to tree cutting, brush clearing, danger tree cutting, management and disposal of cut trees. Includes cleared till handover of line to Owner. Do not include Camps, laydown areas which should be included in the Group summary. Royalty or stumpage fees should not be included.</i>							
C.1	Clearing RoW	km				2.96	
Foundations and anchors for wood pole structures: <i>Including, but not limited to, survey and staking and all Materials, accessories and activities prior to installation of poles, testing. Excludes pole setting.</i>							
F.1	Foundation Overburden - Direct embed drill in soil 44kV	Str.				1.00	
Foundations and anchors for Lattice Steel structures: <i>Including, but not limited to, survey and staking and all Materials, accessories and activities prior to installation of towers. Excludes tower setting.</i>							
H.1	44-SP-TANG	Str.				0.00	
H.2	44-SP-LANG	Str.				0.0	
H.3	44-SP-MANG	Str.				1.0	
H.4	44-SP-HADE	Str.				0.00	
H.5	44-HF-ACAD	Str.				0.00	
J.1	Counterpoise	km				2.96	
J.2	2-pole structure	Str.				0.00	
J.3	3-pole structure	Str.				0.0	
J.4	1-pole structure	Str				1.00	
Conductor and Neutral: <i>Including, but not limited to, conductor and neutral. Includes factory and field tests and inspections. Design/Type tests to be quoted as separate line items in below list.</i>							
N.1c	Conductor Stringing 44kV - 477 ACSR Hawk	cct-km				2.96	
Conventional Shield-wire: <i>Including, but not limited to, shield-wire. Includes factory and field tests and inspections. Design/Type tests to be quoted as separate line items in below list.</i>							
p.1a	OPGW Stringing 115kV - 96 fibre	km				0.0	
p.1b	OPGW Stringing 44kV - 96 fibre	km				2.96	
p.2	ADSS Stringing 25kV - 96 fibre	km				0.0	
Final Completion: Receipt of Final Completion Certificate							
GRAND TOTAL							



Cost Estimate Comparison-Route Change

Regisger ID	59
RFI Number	RFI-0283 0261
Segment	JK

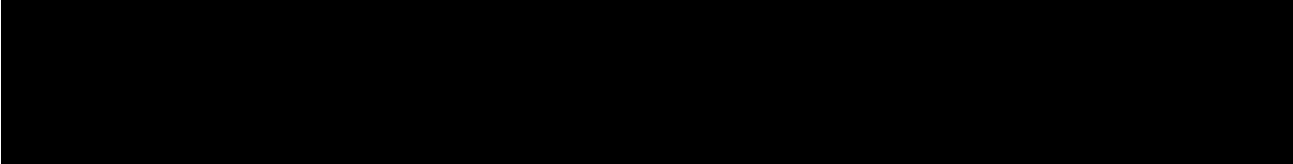
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m)	Ahead Span (m)	Line Angle (dJK)	Structure Type
42	14322.213	705678.381	5891575.224	258.347	370.939	42.3097	W1D
43	14693.151	705712.121	5891944.625	259.758	392.094		W1A
44	15085.246	705747.785	5892335.094	262.289	377.358		W1A
45	15462.603	705782.109	5892710.888	262.766	375.663		W1A
46	15838.266	705816.279	5893084.993	261.986	360.069		W1A
47	16198.335	705849.03	5893443.569	260.415	392.107	-6.5926	W1B
48	16590.441	705839.629	5893835.563	263.842	387.524	11.381	W1B
49	16977.965	705906.97	5894217.191	265.96	386.566		W1A
50	17364.531	705974.144	5894597.876	263.691	358.537		W1A
51	17723.068	706036.447	5894950.958	267.937	385.726	-14.426	W1B
52	18108.794	706006.728	5895335.537	259.592	402.981		W1A
53	18511.776	705975.679	5895737.321	250.515	400.687	41.9828	W1D
54	18912.462	706219.956	5896054.935	249.663	267.536	-29.1604	W1C
55	19179.999	706259.055	5896319.599	248.987	319.228	-49.5051	W1E
56	19499.227	706049.196	5896560.152	256.874	349.305	50.0202	W1E
88	30916.708	712644.326	5904310.052	258.82	374.555	27.1798	W1C
89	31291.264	712989.193	5904456.198	263.638	384.764		W1A
90	31676.028	713343.459	5904606.328	265.882	426.368		W1A
91	32102.396	713736.031	5904772.692	268.108	369.067		W1A
92	32471.463	714075.844	5904916.697	269.825	368.843		W1A
93	32840.305	714415.451	5905060.614	263.621	283.589	-25.2996	W1C
94	33123.894	714604.229	5905272.239	263.602	165.909		W1A
95	33289.803	714714.671	5905396.047	263.579	323.657	-27.3186	W1D
96	33613.46	714795.247	5905709.513	266.402	387.201		W1A
97	34000.661	714891.643	5906084.524	266.015	429.23		W1A
98	34429.891	714998.502	5906500.239	268.686	382.472		W1A
99	34812.363	715093.721	5906870.669	269.886	413.416		W1A
100	35225.779	715196.643	5907271.069	261.702	314.96		W1A
101	35540.739	715275.054	5907576.112	257.635	353.329	53.1305	W1E
224	81603.095	755896.699	5922730.69	217.494	430.832		W1A
225	82033.928	756155.521	5923075.113	215.526	408.742		W1A
226	82442.67	756401.073	5923401.877	216.073	425.596		W1A
227	82868.265	756656.749	5923742.114	209.497	440.108		W1A
228	83308.374	756921.144	5924093.954	215.094	363.732		W1A
229	83672.106	757139.656	5924384.735	220.025	321.151	-34.4073	W1D
230	83993.257	757153.755	5924705.576	221.749	367.115		W1A
231	84360.372	757169.873	5925072.337	222.108	343.008		W1A
232	84703.38	757184.932	5925415.015	225.428			W1D

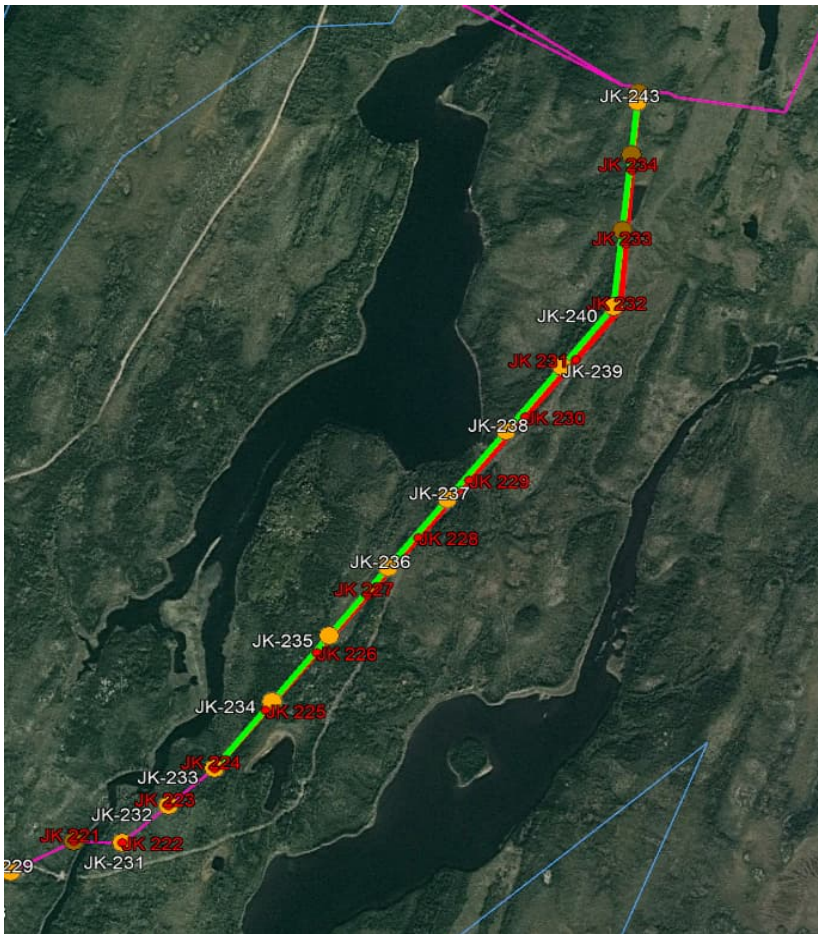
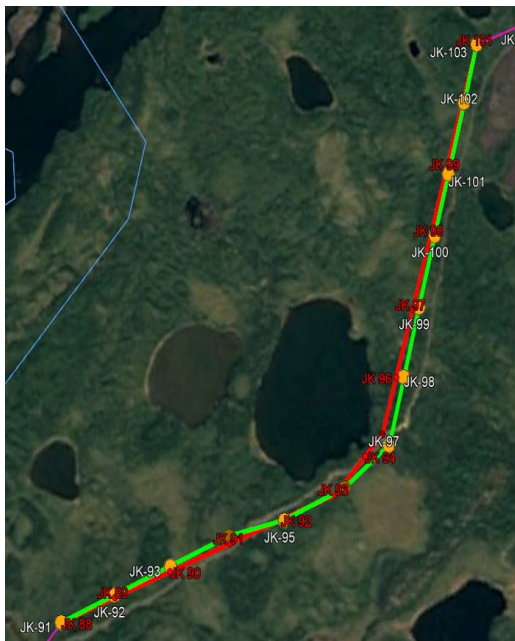
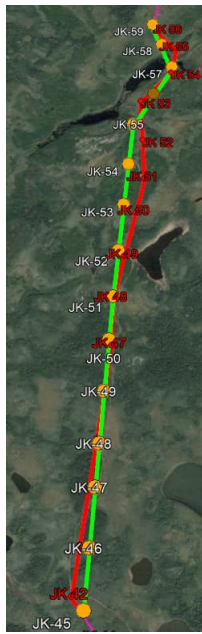
Coste Estimate-Previous Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	13.60	
Access			per Str		
Foundation (W1A)	Normal Instalation		per Str	24	
Foundation (W1B)	Normal Instalation		per Str	3	
Foundation (W1C)	Normal Instalation		per Str	3	
Foundation (W1D)	Normal Instalation		per Str	5	
Foundation (W1E)	Normal Instalation		per Str	3	
Str. Assembly (W1A)	Normal Instalation		per Str	24	
Str. Assembly (W1B)	Normal Instalation		per Str	3	
Str. Assembly (W1C)	Normal Instalation		per Str	3	
Str. Assembly (W1D)	Normal Instalation		per Str	5	
Str. Assembly (W1E)	Normal Instalation		per Str	3	
Grounding			km	13.60	
Dampers			per Str	38	
OPGW Accessories			per Str	38	
OPGW Installation & Testing			per km	13.6	
Conductor Installation			per km	13.6	
Structure Accessories			per Str	38	

Re-alignment Provided by Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (dJK)	Structure Description
CJK-045	14273.919	705763.729	5891463.098	258.89	422.454	38.8292	W1D
CJK-046	14696.373	705777.172	5891885.338	259.343	431.817		W1A
CJK-047	15128.19	705790.914	5892316.936	263.071	325.138		W1A
CJK-048	15453.328	705801.261	5892641.909	262.977	405.918		W1A
CJK-049	15859.246	705814.178	5893047.622	262.034	420.338		W1A
CJK-050	16279.584	705827.554	5893467.747	260.976	367.812		W1A
CJK-051	16647.396	705839.259	5893835.373	263.836	409.16	1.1121	W1A
CJK-052	17056.556	705860.214	5894243.996	266.486	427.475		W1A
CJK-053	17484.031	705882.107	5894670.91	264.098	395.015		W1A
CJK-054	17879.046	705902.337	5895065.406	260.175	404.843		W1A
CJK-055	18283.889	705923.071	5895469.718	256.129	360.759	23.119	W1D
CJK-056	18644.648	706081.527	5895793.815	256.049	328.654		W1A
CJK-057	18973.302	706225.881	5896089.069	250.118	266.785	-46.6608	W1E
CJK-058	19240.087	706131.988	5896338.786	251.041	236.665		W1A
CJK-059	19476.379	706048.828	5896559.96	256.903	316.976	29.5248	W1C
CJK-091	30893.861	712643.968	5904309.853	258.832	375.063	25.4068	W1D
CJK-092	31268.924	712984.609	5904466.811	263.645	397.074		W1A
CJK-093	31665.998	713345.241	5904632.981	266.534	415.106		W1A
CJK-094	32081.104	713722.25	5904806.697	268.275	376.015	9.3338	W1B
CJK-095	32457.119	714084.755	5904906.583	269.802	432.346	-10.4134	W1B
CJK-096	32889.465	714473.944	5905094.879	263.476	372.29	-14.4352	W1B
CJK-097	33261.755	714758.071	5905335.443	263.6	385.424	-36.7614	W1D
CJK-098	33647.179	714844.674	5905711.012	267.406	394.973		W1A
CJK-099	34042.152	714933.421	5906095.885	267.813	411.34		W1A
CJK-100	34453.491	715025.847	5906496.706	269.346	355.308		W1A
CJK-101	34808.799	715105.682	5906842.929	270.502	412.09		W1A
CJK-102	35220.889	715198.276	5907244.482	261.945	340.126		W1A
CJK-103	35561.015	715274.7	5907575.91	257.644	343.329	54.5614	W1E
CJK-233	80811.514	755408.716	5922081.534	212.015	411.352	-10.2992	W1B
CJK-234	81222.866	755652.228	5922413.064	213.68	408.244		W1A
CJK-235	81631.11	755893.901	5922742.089	218.17	423.919		W1A
CJK-236	82055.029	756144.853	5923083.747	214.912	425.39		W1A
CJK-237	82480.419	756396.676	5923426.591	215.367	424.239		W1A
CJK-238	82904.658	756647.817	5923768.507	209.192	403.599		W1A
CJK-239	83308.257	756886.74	5924093.788	214.841	374.068		W1A
CJK-240	83682.325	757108.181	5924395.269	219.856	380.498	-32.011	W1D
CJK-241	84062.823	757136.622	5924774.703	222.469	376.349		W1A
CJK-242	84439.172	757164.754	5925149.999	225.432	265.211	0.0689	W1A
CJK-243	84704.383	757184.896	5925414.444		44.248	-1.8243	W1D

Coste Estimate-Re-Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	14.47	
Access			per Str		
Foundation (W1A)	Normal Instalation		per Str	26	
Foundation (W1B)	Normal Instalation		per Str	4	
Foundation (W1C)	Normal Instalation		per Str	1	
Foundation (W1D)	Normal Instalation		per Str	6	
Foundation (W1E)	Normal Instalation		per Str	2	
Str. Assembly (W1A)	Normal Instalation		per Str	26	
Str. Assembly (W1B)	Normal Instalation		per Str	4	
Str. Assembly (W1C)	Normal Instalation		per Str	1	
Str. Assembly (W1D)	Normal Instalation		per Str	6	
Str. Assembly (W1E)	Normal Instalation		per Str	2	
Grounding			per km	14.5	
Dampers			per Str	39	
OPGW Accessories			per Str	39	
OPGW Installation & Testing			per km	14.5	
Conductor Installation			per km	14.5	
Structure Accessories			per Str	39	
					Difference

3. Cost Comparison





Cost Estimate Comparison-Route Change

Register ID	60
RFI Number	HATCH-VAL-RFI-0257
Segment	RT

Previous Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
108	37965.53	439729.241	5800235.198	372.15	419.439		W1A
109	38384.968	439458.718	5800555.74	352.822	295.86		W1A
110	38680.828	439267.9	5800781.84	369.818	297.639		W1A
111	38978.467	439075.934	5801009.3	357.152	352.43	36.4785	W1D
112	39330.897	439053.287	5801361.001	353.573	365.512		W1A
113	39696.409	439029.8	5801725.758	366.478	267.023		W1A
114	39963.432	439012.641	5801992.229	372.6	385.1		W1A
115	40348.532	438987.895	5802376.533	368.151	392.083		W1A
116	40740.615	438962.7	5802767.806	376.109	344.622	1.5706	W1A
117	41085.238	438949.99	5803112.194	380.534	354.589		W1A
118	41439.826	438936.911	5803466.541	379.709	424.033		W1A
119	41863.859	438921.272	5803890.286	381.76	274.689		W1A

Coste Estimate-Previous Alignment

Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	4.2	
Access			per Str		
Foundation (W1A)			per Str		
Foundation (W1B)			per Str		
Foundation (W1C)			per Str		
Foundation (W1D)			per Str		
Foundation (W1E)			per Str		
Foundation Heli (W1A)	Heli Installation		per Str	11	
Foundation Heli (W1B)	Heli Installation		per Str		
Foundation Heli (W1C)	Heli Installation		per Str		
Foundation Heli (W1D)	Heli Installation		per Str	1	
Foundation Heli (W1E)	Heli Installation		per Str		
Str. Assembly (W1A)			per Str		
Str. Assembly (W1B)			per Str		
Str. Assembly (W1C)			per Str		
Str. Assembly (W1D)			per Str		
Str. Assembly (W1E)			per Str		
Str. Assembly Heli (W1A)	Heli Installation		per Str	11	
Str. Assembly Heli (W1B)	Heli Installation		per Str		
Str. Assembly Heli (W1C)	Heli Installation		per Str		
Str. Assembly Heli (W1D)	Heli Installation		per Str	1	
Str. Assembly Heli (W1E)	Heli Installation		per Str		
Grounding			per Str	12	
Dampers			per Str	12	
OPGW Accessories			per Str	12	
OPGW Installation & Testing			per km	4.2	
Conductor Installation			per km	4.2	
Structure Accessories			per Str	12	
Total					

Final Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
108	37954.583	439733.23	5800232.131	372.382	315.658	-27.8548	W1C
109	38269.89	439439.996	5800348.982	363.904	336.838		W1A
110	38606.728	439127.646	5800475.068	374.741	384.328		W1A
111	38991.056	438771.259	5800618.929	373.475	407.496		W1A
112	39398.552	438393.388	5800771.463	377.355	294.378		W1A
113	39692.93	438120.412	5800881.655	376.133	340.495		W1A
114	40033.425	437804.67	5801009.109	366.067	375.717	57.5073	W1E
115	40409.142	437736.135	5801378.522	377.646	355.458		W1A
116	40764.6	437671.294	5801728.016	373.356	416.345		W1A
117	41180.945	437595.347	5802137.376	378.265	388.89		W1A
118	41569.835	437524.408	5802519.741	373.86	377.247	56.3496	W1E
119	41947.082	437795.04	5802782.559	374.758	401.291		W1A
120	42348.373	438082.921	5803062.129	373.466	335.23		W1A
121	42683.603	438323.411	5803295.675	379.462	416.651		W1A
122	43100.254	438622.311	5803585.945	367.055	416.785		W1A
123	43517.039	438921.308	5803876.308	381.221	288.721	-47.9529	W1E

Re-Alignment Vs Previous Alignment Provided By Valard

Coste Estimate-Re-Alignment

Item	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	5.9	
Access			per Str		
Foundation (W1A)			per Str		
Foundation (W1B)			per Str		
Foundation (W1C)			per Str		
Foundation (W1D)			per Str		
Foundation (W1E)			per Str		
Foundation Heli (W1A)	Heli Installation		per Str	12	
Foundation Heli (W1B)	Heli Installation		per Str		
Foundation Heli (W1C)	Heli Installation		per Str	1	
Foundation Heli (W1D)	Heli Installation		per Str		
Foundation Heli (W1E)	Heli Installation		per Str	3	
Str. Assembly (W1A)			per Str		
Str. Assembly (W1B)			per Str		
Str. Assembly (W1C)			per Str		
Str. Assembly (W1D)			per Str		
Str. Assembly (W1E)			per Str		
Str. Assembly Heli (W1A)	Heli Installation		per Str	12	
Str. Assembly Heli (W1B)	Heli Installation		per Str		
Str. Assembly Heli (W1C)	Heli Installation		per Str	1	
Str. Assembly Heli (W1D)	Heli Installation		per Str		
Str. Assembly Heli (W1E)	Heli Installation		per Str	3	
Grounding			per Str	16	
Dampers			per Str	16	
OPGW Accessories			per Str	16	
OPGW Installation & Testing			per km	5.9	
Conductor Installation			per km	5.9	
Structure Accessories			per Str	16	
				Total	
				Cost Difference	



Cost Estimate Comparison-Route Change

Register ID	61
RFI Number	HATCH-VAL-RFI-0257
Segment	RT

Previous Alignment Provided By Valard

Total	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
81	27768.252	437473.739	5791026.166	363.458	429.167		W1A
82	28197.419	437589.057	5791439.549	379.907	382.272		W1A
83	28579.691	437691.775	5791807.762	366.671	379.999		W1A
84	28959.69	437793.881	5792173.787	373.263	421.405		W1A
85	29381.095	437907.114	5792579.694	365.914	381.479		W1A
86	29762.574	438009.618	5792947.143	370.405	332.251	-15.0822	W1C
87	30094.824	438012.546	5793279.381	366.192	400.698		W1A
88	30495.522	438016.077	5793680.063	360.062	309.477		W1A
89	30804.999	438018.804	5793989.528	368.253	395.076		W1A
90	31200.075	438022.285	5794384.589	358.348	297.459		W1A
91	31497.534	438024.906	5794682.036	368.685	432.457	19.7471	W1C

Coste Estimate-Previous Alignment

Item	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km		4.2
Access			per Str		
Foundation Heli (W1A)	Heli Installation		per Str		9
Foundation Heli (W1B)	Heli Installation		per Str		
Foundation Heli (W1C)	Heli Installation		per Str		2
Foundation Heli (W1D)	Heli Installation		per Str		
Foundation Heli (W1E)	Heli Installation		per Str		
Str. Assembly Heli (W1A)	Heli Installation		per Str		9
Str. Assembly Heli (W1B)	Heli Installation		per Str		
Str. Assembly Heli (W1C)	Heli Installation		per Str		2
Str. Assembly Heli (W1D)	Heli Installation		per Str		
Str. Assembly Heli (W1E)	Heli Installation		per Str		
Grounding			per Str		11
Dampers			per Str		11
OPGW Accessories			per Str		11
OPGW Installation & Testing			per km		4.2
Conductor Installation			per km		4.2
Structure Accessories			per Str		11
Total					

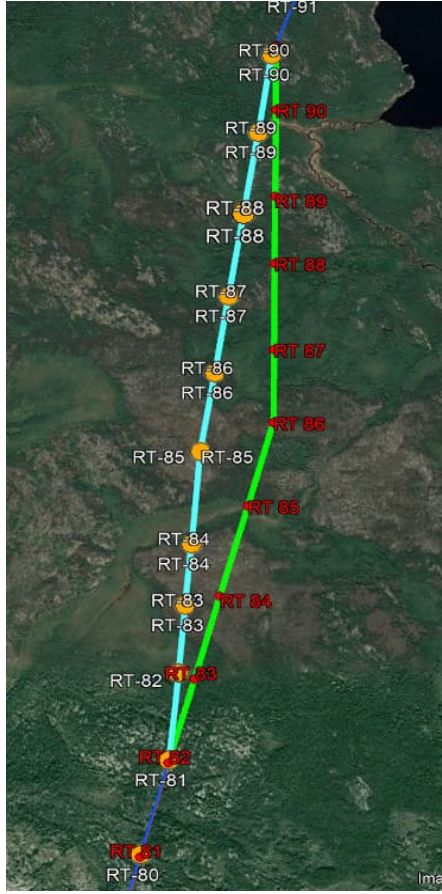
Final Alignment Provided By Valard

Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
80		437473.739	5791026.166	363.458	429.167		W1A
81	28220.56	437589.407	5791442.598	379.888	385.07	-10.376	W1B
82	28605.63	437624.381	5791826.077	366.115	302.97		W1A
83	28908.601	437651.898	5792127.795	370.792	274.673		W1A
84	29183.274	437676.845	5792401.333	367.941	417.463		W1A
85	29600.737	437714.761	5792817.071	374.602	360.485	3.9223	W1B
86	29961.222	437771.982	5793172.985	371.565	354.108		W1A
87	30315.33	437828.19	5793522.604	368.475	384.713		W1A
88	30700.043	437889.257	5793902.439	362.374	379.631		W1A
89	31079.674	437949.516	5794277.257	360.859	362.142		W1A
90	31441.816	438007	5794634.808	371.465	340.494	11.1151	W1B

Coste Estimate-Re-Alignment

Item	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km		4.0
Access			per Str		
Foundation Heli (W1A)	Heli Installation		per Str		8
Foundation Heli (W1B)	Heli Installation		per Str		3
Foundation Heli (W1C)	Heli Installation		per Str		
Foundation Heli (W1D)	Heli Installation		per Str		
Foundation Heli (W1E)	Heli Installation		per Str		
Str. Assembly Heli (W1A)	Heli Installation		per Str		8
Str. Assembly Heli (W1B)	Heli Installation		per Str		3
Str. Assembly Heli (W1C)	Heli Installation		per Str		
Str. Assembly Heli (W1D)	Heli Installation		per Str		
Str. Assembly Heli (W1E)	Heli Installation		per Str		
Grounding			per Str		11
Dampers			per Str		11
OPGW Accessories			per Str		11
OPGW Installation & Testing			per km		4.0
Conductor Installation			per km		4.0
Structure Accessories			per Str		11
Total					
Cost Difference				Cost Difference	





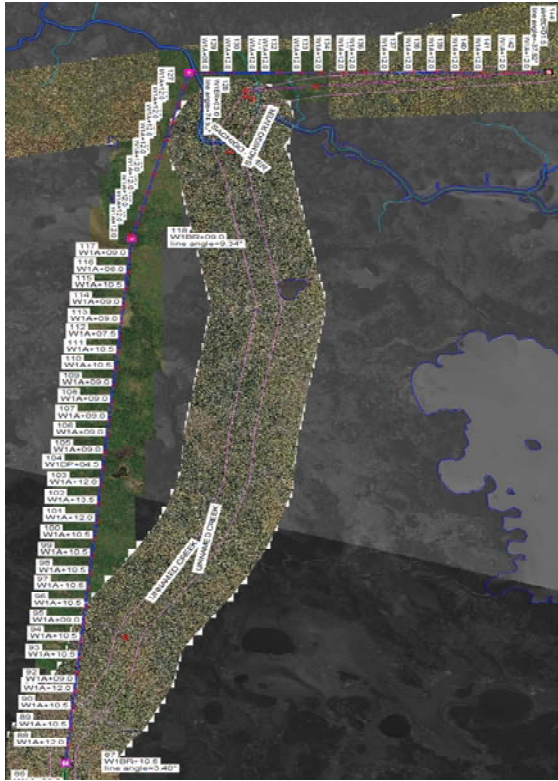
Cost Estimate Comparison-Route Change							
Register ID	9						
RFI Number	RFI-0294						
Segment	EG						
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
84	32455.977	562392.182	5948296.042	265.818	413.457		W1A
85	32869.434	561979.005	5948311.256	262.464	409.432		W1A
86	33278.866	561569.85	5948326.321	261.149	330.782		W1A
87	33609.648	561239.292	5948338.493	259.484	350.709	17.6992	W1C
88	33960.357	560909.333	5948457.337	258.845	439.043		W1A
89	34399.4	560496.267	5948606.115	257.653	439.715		W1A
90	34839.116	560082.567	5948755.121	257.413	374.39		W1A
91	35213.506	559730.328	5948881.99	258.769	388.33		W1A
92	35601.837	559364.974	5949013.583	268.929	411.478		W1A
93	36013.315	558977.841	5949153.02	257.357	421.036		W1A
94	36434.351	558581.717	5949295.696	256.433	411.674	12.4772	W1A
95	36846.025	558233.688	5949515.585	258.307	422.753		W1A
96	37268.777	557876.293	5949741.392	259.191	408.01		W1A
97	37676.787	557531.361	5949959.324	256.189	416.669		W1A
98	38093.457	557179.109	5950181.881	253.748	416.033		W1A
99	38509.49	556827.394	5950404.099	255.155	411.79		W1A
100	38921.28	556479.268	5950624.05	253.951	356.664		W1A
101	39277.944	556177.744	5950814.556	251.036	419.911		W1A
102	39697.855	555822.751	5951038.845	254.099	406.75		W1A
103	40104.605	555478.885	5951256.104	256.347	350.966		W1D
104	40455.571	555182.178	5951443.567	259.647	346.907	-24.5374	W1A
105	40802.477	554838.438	5951490.334	260.879	426.806		W1A
106	41229.284	554415.528	5951547.873	264.921	429.069		W1A
107	41658.353	553990.377	5951605.717	264.769	385.91		W1A
108	42044.263	553607.989	5951657.743	268.138	392.098		W1A
109	42436.361	553219.47	5951710.603	265.173	389.223		W1A
110	42825.584	552833.801	5951763.075	259.378	394.872		W1A
111	43220.456	552442.533	5951816.309	258.053	412.329		W1A
112	43632.785	552033.968	5951871.896	256.205	427.599		W1A
113	44060.385	551610.272	5951929.542	255.932	371.936		W1A
114	44432.321	551241.731	5951979.683	256.422	352.666		W1A
115	44784.987	550892.285	5952027.227	262.592	319.543	-19.637	W1C
116	45104.53	550579.597	5951961.395	262.668	420.527		W1A
117	45525.057	550168.091	5951874.758	269.19	400.106		W1A
118	45925.163	549776.568	5951792.328	267.87	409.356		W1A
119	46334.52	549375.993	5951707.992	270.005	381.409		W1A
120	46715.929	549002.766	5951629.414	264.787	390.193		W1A
121	47106.122	548620.944	5951549.026	263.524	347.381		W1A
122	47453.503	548281.015	5951477.458	264.119	423.715		W1A
123	47877.218	547866.39	5951390.164	266.801	325.988		W1A
124	48203.205	547547.395	5951323.004	268.162	240.04		W1A
125	48443.246	547312.504	5951273.551	252.134	353.094	22.2381	W1D
126	48796.34	546965.154	5951336.981	259.669	353.647		W1A
127	49149.986	546617.261	5951400.511	257.55	361.656		W1A
128	49511.643	546261.488	5951465.479	256.608	293.866		W1A
129	49805.509	545972.402	5951518.27	259.329	338.338	74.9576	W1E
130	50143.847	545944.717	5951855.473	256.206	356.432		W1A
131	50500.279	545915.552	5952210.71	258.296	411.875		W1A
132	50912.154	545881.849	5952621.204	257.152	423.91		W1A
133	51336.065	545847.163	5953043.693	259.012	388.083		W1A
134	51724.148	545815.407	5953430.475	260.159	402.472		W1A
135	52126.62	545782.474	5953831.597	262.445	381.474		W1A
136	52508.094	545751.26	5954211.792	263.464	391.138		W1A
137	52899.231	545719.255	5954601.618	259.934	425.229		W1A
138	53324.46	545684.46	5955025.42	257.776	425.59		W1A
139	53750.05	545649.635	5955449.583	259.612	398.787		W1A
140	54148.837	545617.004	5955847.034	263.914	370.687		W1A
141	54519.524	545586.672	5956216.477	267.095	372.158		W1A
142	54891.682	545556.22	5956587.387	264.349	310.536		W1A
143	55202.218	545530.81	5956896.882	261.666	300.093	-33.4491	W1D

Coste Estimate-Previous Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	23.0	
Access			per Str	60	
Foundation (W1A)	Normal Instalation		per Str	52	
Foundation (W1B)	Normal Instalation		per Str	1	
Foundation (W1C)	Normal Instalation		per Str	3	
Foundation (W1D)	Normal Instalation		per Str	3	
Foundation (W1E)	Normal Instalation		per Str	1	
Str. Assembly (W1A)	Normal Instalation		per Str	52	
Str. Assembly (W1B)	Normal Instalation		per Str	1	
Str. Assembly (W1C)	Normal Instalation		per Str	3	
Str. Assembly (W1D)	Normal Instalation		per Str	3	
Str. Assembly (W1E)	Normal Instalation		per Str	1	
Grounding			km	23.0	
Dampers			per Str	60	
OPGW Accessories			per Str	60	
OPGW Installation & Testing			per km	23.0	
Conductor Installation			per km	23.0	
Structure Accessories			per Str	60	
				Total=	

Re-alignment Provided by Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
84	32493.875	562383.862	5948296.348	265.833	410.187		W1A
85	32904.062	561973.953	5948311.442	262.393	404.377		W1A
86	33308.439	561569.85	5948326.321	261.149	412.089	3.3963	W1B
87	33720.528	561159.662	5948365.855	259.483	416.945		W1A
88	34137.473	560744.64	5948405.854	258.703	418.949		W1A
89	34556.422	560327.623	5948446.046	259.018	419.608		W1A
90	34976.03	559909.95	5948486.3	257.932	420.954		W1A
91	35396.984	559490.938	5948526.684	261.367	377.281		W1A
92	35774.265	559115.397	5948562.878	256.306	408.498		W1A
93	36182.763	558708.783	5948602.067	254.413	381.482		W1A
94	36564.245	558329.061	5948638.665	255.791	418.434		W1A
95	36982.679	557912.557	5948678.807	254.295	387.312		W1A
96	37369.991	557527.031	5948715.963	257.797	369.126		W1A
97	37739.117	557159.608	5948751.375	257.798	402.94		W1A
98	38142.057	556758.526	5948790.031	255.573	406.344		W1A
99	38548.401	556354.056	5948829.013	256.221	405.371		W1A
100	38953.772	555950.555	5948867.902	257.73	413.845		W1A
101	39367.617	555538.619	5948907.604	257.855	398.27		W1A
102	39765.887	555142.186	5948945.812	259.723	399.106		W1A
103	40164.993	554744.92	5948984.1	267.823	373.015		W1D
104	40538.008	554373.626	5949019.884	265.018	411.621		W1A
105	40949.629	553963.903	5949059.373	260.204	376.02		W1A
106	41325.649	553589.618	5949095.446	262.535	393.821		W1A
107	41719.47	553197.613	5949133.227	263.392	380.47		W1A
108	42099.94	552818.898	5949169.727	264.935	403.226		W1A
109	42503.166	552417.532	5949208.41	267.715	373.654		W1A
110	42876.82	552045.601	5949244.257	267.576	353.24		W1A
111	43230.06	551693.991	5949278.144	274.993	352.857		W1A
112	43582.917	551342.761	5949311.995	267.741	401.438		W1A
113	43984.355	550943.175	5949350.507	267.658	395.464		W1A
114	44379.819	550549.535	5949388.446	268.041	372.866		W1A
115	44752.685	550178.388	5949424.216	269.626	364.703		W1A
116	45117.388	549815.368	5949459.204	267.484	413.06		W1A
117	45530.448	549404.213	5949498.83	276.388	357.101	9.337	W1B
118	45887.549	549059.026	5949590.304	272.231	376.21		W1A
119	46263.759	548695.368	5949686.673	263.552	381.607		W1A
120	46645.366	548326.494	5949784.424	261.47	409.028		W1A
121	47054.394	547931.113	5949889.199	261.85	422.738		W1A
122	47477.132	547522.479	5949997.487	260.168	422.738		W1A
123	47899.87	547113.846	5950105.774	260.514	427.309		W1A
124	48327.179	546700.794	5950215.232	259.853	425.023		W1A
125	48752.202	546289.952	5950324.104	259.671	427.077		W1A
126	49179.279	545877.124	5950433.503	254.164	332.974		W1A
127	49512.252	545555.26	5950518.796	252.323	346.776	74.9349	W1E
128	49859.029	545553.91	5950865.57	265.057	409.328		W1A
129	50268.357	545552.317	5951274.895	264.979	424.398		W1A
130	50692.755	545550.665	5951699.29	259.612	396.105		W1A
131	51088.86	545549.124	5952095.392	256.822	389.631		W1A
132	51478.491	545547.607	5952485.02	254.475	393.111		W1A
133	51871.602	545546.077	5952878.128	256.538	394.529		W1A
134	52266.131	545544.542	5953272.654	258.599	350.07		W1A
135	52616.201	545543.179	5953622.721	262.263	419.52		W1A
136	53035.721	545541.546	5954042.238	262.28	420.802		W1A
137	53456.523	545539.909	5954463.037	260.385	412.709		W1A
138	53869.232	545538.302	5954875.743	259.547	417.792		W1A
139	54287.024	545536.676	5955293.532	260.592	415.407		W1A
140	54702.431	545535.06	5955708.935	263.974	416.197		W1A
141	55118.628	545533.44	5956125.129	267.93	421.592		W1A
142	55540.22	545531.799	5956546.718	264.832	350.016		W1A
143	55890.235	545530.437	5956896.731	261.67	300.095	-37.9197	W1D

Coste Estimate-Re-Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	23.7	
Access			per Str	60	
Foundation (W1A)	Normal Instalation		per Str	55	
Foundation (W1B)	Normal Instalation		per Str	2	
Foundation (W1C)	Normal Instalation		per Str		
Foundation (W1D)	Normal Instalation		per Str	2	
Foundation (W1E)	Normal Instalation		per Str	1	
Str. Assembly (W1A)	Normal Instalation		per Str	55	
Str. Assembly (W1B)	Normal Instalation		per Str	2	
Str. Assembly (W1C)	Normal Instalation		per Str		
Str. Assembly (W1D)	Normal Instalation		per Str	2	
Str. Assembly (W1E)	Normal Instalation		per Str	1	
Grounding			per km	23.7	
Dampers			per Str	60	
OPGW Accessories			per Str	60	
OPGW Installation & Testing			per km	23.7	
Conductor Installation			per km	23.7	
Structure Accessories			per Str	60	
				Total=	
				Difference	

3. Cost Comparison



Cost Estimate Comparison-Route Change

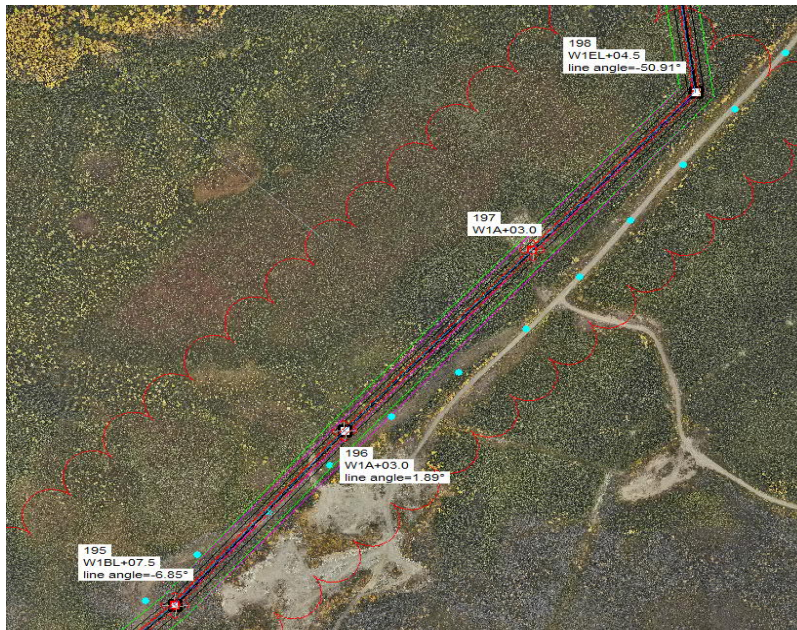
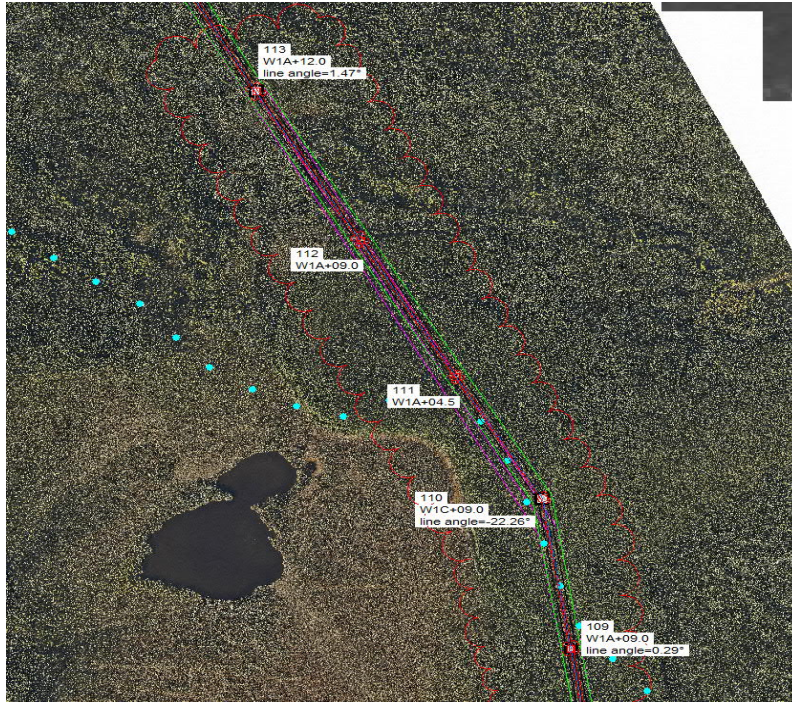
Register ID	80						
RFI Number	HATCH-VAL-RFI-0306_CCR-037						
Segment	VY						
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
111	40046.836	515831.715	5836479.902	331.07	956		W1A
112	40387.35	515772.853	5836815.289	332.959		-20.505	W1C
113	40761.625	515583.122	5837137.911	332.262			W1A
114	41169.039	515376.593	5837489.097	326.506			W1A
115	41587.881	515164.271	5837850.134	328.366			W1A
196	70878.517	512819.688	5864120.515	295.833		-5.5901	W1B
197	71197.166	513033.393	5864356.877	291.902			W1A
198	71537.234	513261.463	5864609.129	295.718			W1A
199	71834.462	513460.801	5864829.602	292.514		-50.2828	W1E

RFP Alignment

Coste Estimate-Previous Alignment							
Total	Installation Type	Average Price	Unit	Quantity	Cost		
RoW Clearing			per km	1.0			
Access			per Str	9			
Foundation (W1A)	Normal Instalation		per Str	6			
Foundation (W1B)	Normal Instalation		per Str	1			
Foundation (W1C)	Normal Instalation		per Str	1			
Foundation (W1D)	Normal Instalation		per Str	1			
Foundation (W1E)	Normal Instalation		per Str	1			
Str. Assembly (W1A)	Normal Instalation		per Str	6			
Str. Assembly (W1B)	Normal Instalation		per Str	1			
Str. Assembly (W1C)	Normal Instalation		per Str	1			
Str. Assembly (W1D)	Normal Instalation		per Str	1			
Str. Assembly (W1E)	Normal Instalation		per Str	1			
Grounding			per Str	9			
Dampers			per Str	9			
OPGW Accessories			per Str	9			
OPGW Installation & Testing			per km	1.0			
Conductor Installation			per km	1.0			
Structure Accessories			per Str	9			
Total				Total=			
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
109	39673.634	515819.146	5836548.814	331.363	956	0.2885	W1A
110	40019.409	515762.445	5836890.195	332.741		-22.2608	W1C
111	40346.363	515588.186	5837167.174	331.238			W1A
112	40713.875	515393.833	5837479.092	326.998			W1A
113	41112.609	515182.969	5837817.508	328.603		1.4673	W1A
195	70441.03	512819.235	5864120.455	295.77		-6.8487	W1B
196	70759.756	513027.748	5864361.512	292.054		1.8879	W1A
197	71099.846	513258.589	5864611.258	295.894			W1A
198	71397.091	513460.349	5864829.541	292.519		-50.9121	W1E

Re-Alignment Vs Previous Alignment Provided By Valard

Coste Estimate-Re-Alignment					
Item	Tower Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	1.0	
Access			per Str	9	
Foundation (W1A)	Normal Instalation		per Str	6	
Foundation (W1B)	Normal Instalation		per Str	1	
Foundation (W1C)	Normal Instalation		per Str	1	
Foundation (W1D)	Normal Instalation		per Str	1	
Foundation (W1E)	Normal Instalation		per Str	1	
Str. Assembly (W1A)	Normal Instalation		per Str	6	
Str. Assembly (W1B)	Normal Instalation		per Str	1	
Str. Assembly (W1C)	Normal Instalation		per Str	1	
Str. Assembly (W1D)	Normal Instalation		per Str	1	
Str. Assembly (W1E)	Normal Instalation		per Str	1	
Grounding			per Str	9	
Dampers			per Str	9	
OPGW Accessories			per Str	9	
OPGW Installation & Testing			per km	1.0	
Conductor Installation			per km	1.0	
Structure Accessories			per Str	9	
Total				Total=	
Cost Difference					



Line Segment S1 - Route Change

Custom Tan/Riser
Custom Tan/Riser

Structures	Old	New	Material/ Equipment	Construction	Total	Old Total	New Total
25-1P-RISER POLE	2	2					
25-1P-TAN-3-66Riser Pole	0	2					
25-1P-TAN-3-66	9	8					
25-1P-ANG-1-66	1	0					
25-1P-COR	1	0					
25-1P-DE-1-66	2	3					
Str Total	15	15					

FDNAncHors	New (1 additional Structures)	Material/ Equipment	ConstructionC12:E12K13D12:E12	Total	New Total
Foundation Overburden - Direct embed drill in soil 25kV	0				
Anchor OVB - Screw Anchor 14" (See Note)	3				
<i>Anchor added (1 additional per riser, 1 additional for corner to DE change)</i>					

Underground Install (Length correction)	Old (meters)	New (meters)	Material/ Equipment	Construction	Total	Old Total	New Total
25kV Direct Bury cable (3 x 750kcmil Al 25kV cables)	300	270.2	\$ 155.25				

Stringing Overhead (Length Correction)	Old (km)	New (km)	Material/ Equipment	Construction	Total	Old Total	New Total
25kV stringing	1.30	1.258	\$ 6,590.6				
Neutral 25kV	1.30	1.258	\$ 7,875.18				
ADSS Stringing 25kV - 96 fibre	1.30	1.258	\$ 7,602.4				

Grounding Correction	Old (km)	New (km)	Material/ Equipment	Construction	Total	Old Total	New Total
Grounding - 1 pole structure	15	15	\$ -				

Other Items	Unit	Unit Rate	Total
Engineering (Underground)		70	
Engineering Time Structure and realign		30	

Poplar Hill (Underground)							
Description			Material/ Equipment	Construction	Total M&C	Unit Total	Estimated Total
1		Increase in Trench Depth (Additional Bedding Sand Required)	m				
2		Addition of Conduit (1 x 2" HDPE, 5x 6" DB2 Conduit, Elbows, and Misc.)	m				
2a		1 x 2" HDPE	m				
2b		1 x 2" PVC Conduit, Elbows, and Misc.	m				
2c		5x 6" DB2 Conduit, Elbows, and Misc.	m				
3		750MCM Aluminum to 350MCM Copper Conductor Change	m				
4		Addition Spare Conductor (1x350MCM)	m				
Total Estimated Price Increase Per Meter (Underground)							

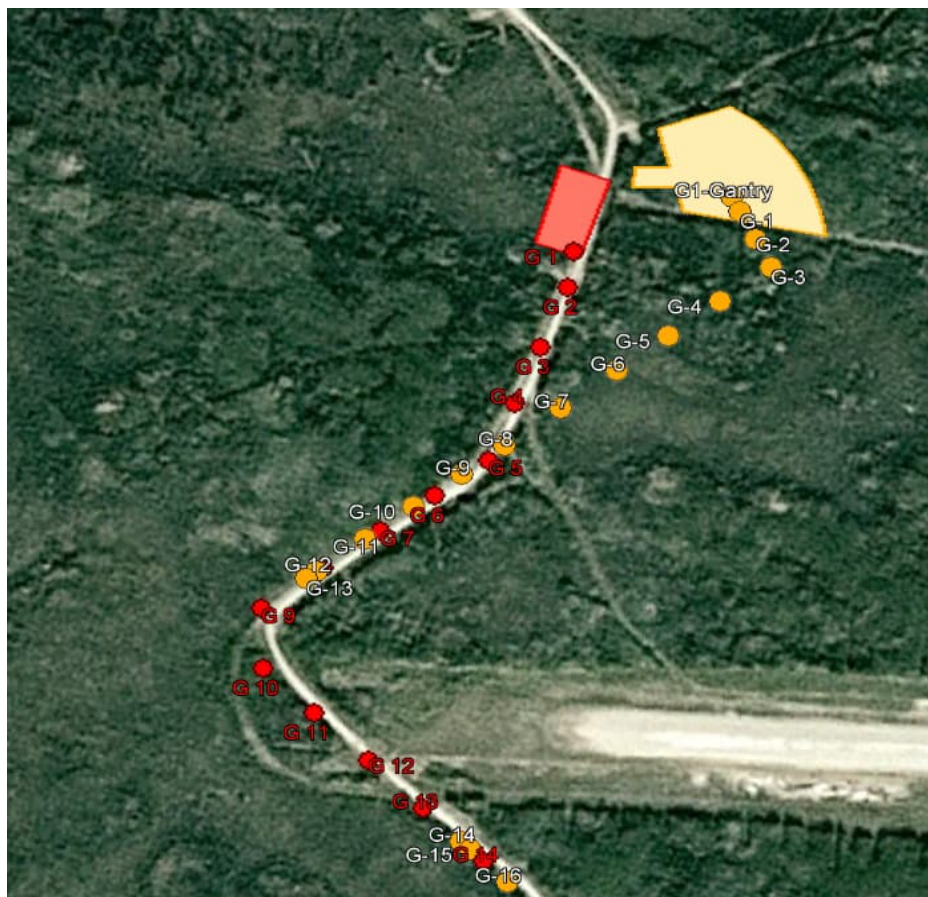


Cost Estimate Comparison-Route Change							
Register ID	98						
RFI Number	RFI-0371, CCO-028						
Segment	G1						
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
G1-001		-	-	-	1000		25-1P-DE-1-50
G1-002		-	-	-			25-1P-ANG-1-50
G1-003		-	-	-			25-1P-TAN-3-50
G1-004		-	-	-			25-1P-ANG-1-50
G1-005		-	-	-			25-1P-TAN-3-50
G1-006		-	-	-			25-1P-TAN-3-50
G1-007		-	-	-			25-1P-TAN-3-50
G1-008		-	-	-			25-1P-TAN-3-50
G1-009		-	-	-			25-1P-ANG-1-50
G1-010		-	-	-			25-1P-ANG-1-50
G1-011		-	-	-			25-1P-TAN-3-50
G1-012		-	-	-			25-1P-TAN-3-50
G1-013		-	-	-			25-1P-TAN-3-50
G1-014		-	-	-			25-1P-TAN-3-50
G1-015		-	-	-			25-1P-ANG-1-50

Cost Estimate-Previous Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			km	1	
Access			per str.	15	
25-1P-TAN			per str.	9	
25-1P-ANG			per str.	5	
25-1P-COR			per str.		
25-1P-DE			per str.	1	
25-1P-DE- Zero degree			per str.		
25-1P-DE- Riser Pole			per str.		
Grounding-1-pole structure			per str.	15	
Accessories-Conductor&neutral accessories - Vibration Damper			km	1	
OPGW and ADSS Fittings and Accessories:			km	1	
Conductor Stringing			km	1	
Neural Stringing			km	1	
OPGW Stringing			km	1	
ADSS Stringing			km	1	
Structure and line identification and Danger plates			per str.	Total=	
					Total

Re-alignment Provided by Valard								
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Type	
G1-001	20	552392.343	5972369.305	265.694	38.81		DL3-120.1-0500 Tangent (Flat)	
G1-002	58.81	552410.496	5972335	265.012	38.93		DL3-112-0500 DDE	
G1-003	97.74	552428.706	5972300.589	264.849	72.22	81.73	DL3-110.3-0500 / DL3-124-0500 Heavy angle DE	
G1-004	169.96	552370.4	5972257.976	263.74	73.49		DL3-106-0500 Tangent	
G1-005	243.44	552311.071	5972214.615	263.097	73.14		DL3-106-0500 Tangent	
G1-006	316.58	552252.023	5972171.46	262.768	79.68		DL3-106-0500 Tangent	
G1-007	396.26	552187.694	5972124.445	262.766	79.67		DL3-106-0500 Tangent	
G1-008	475.93	552123.371	5972077.434	263.303	60.81		DL3-106-0500 Tangent	
G1-009	536.75	552074.272	5972041.55	265.961	68.43		DL3-106-0500 Tangent	
G1-010	605.18	552019.024	5972001.172	263.611	68.56		DL3-106-0500 Tangent	
G1-011	673.74	551963.672	5971960.718	263.251	68.62		DL3-106-0500 Tangent	
G1-012	742.35	551908.275	5971920.231	263.129	15.03		DL3-106-0500 Tangent	
G1-013	757.38	551896.136	5971911.36	263.104	100		DL3-110.3-0500 Deadend riser	
G1-014	857.39	552076.974	5971587.324	259.804	14.98		DL3-110.3-0500 Deadend riser	
G1-015	872.37	552087.975	5971577.149	259.765	58.47		DL3-106-0500 Tangent	
G1-016	930.84	552130.897	5971537.45	259.705	58.8		DL3-106-0500 Tangent	
G1-017	989.64	552174.065	5971497.524	259.793	71.01	-34.29	DL3-108.2-0500 Medium angle	
G1-018	1060.65	552244.301	5971487.059	261.901	75.22	25.72	DL3-108.2-0500 Medium angle	

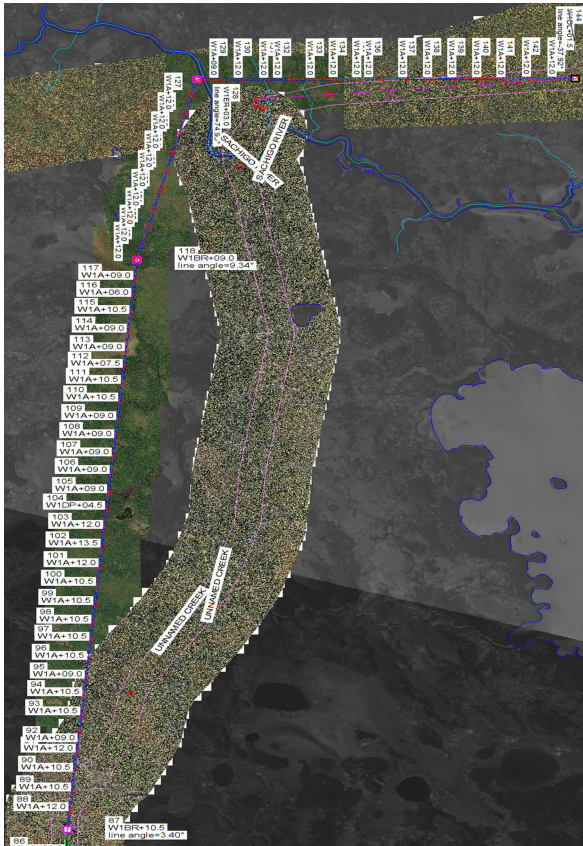
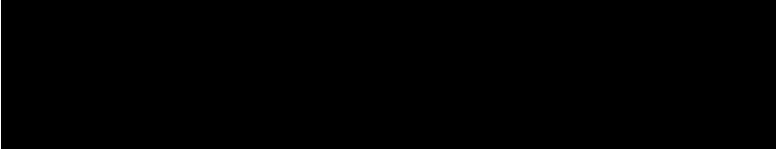
Coste Estimate-Re-Alignment					
Total	Installation Type	Average Price	Unit	Quantity	Cost
	RoW Clearing		km	1.1	
	Access		per str.	18.0	
	44-SP-TANG		per str.		
	44-SP-LANG		per str.		
	44-SP-MANG		per str.		
	44-SP-HADE		per str.		
	44-HF-ACAD		per str.		
	25-1P-TAN		per str.	12.0	
	25-1P-ANG		per str.		
	25-1P-COR		per str.	2.0	
	25-1P-DE		per str.	1.0	
	25-1P-DDE- Zero degree		per str.	1.0	
	25-1P-DE- Riser Pole		per str.	2	
	Grounding-1-pole structure		per str.	18.0	
	Accessories-Conductor&neutral accessories - Vibration Damper		km	1.1	
	OPGW and ADSS Fittings and Accessories:		km	1.1	
	Conductor Stringing		km	1.1	
	Neural Stringing		km	1.1	
	OPGW Stringing		km	-	
	ADSS Stringing		km	1.1	
	Structure and line Identification and Danger plates		per str.	18	
Total					



Cost Estimate Comparison-Route Change							
Register ID	99						
RFI Number	RFI-335						
Segment	EG						
Previous Alignment Provided By Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Z Elevation (m) Centerline	Ahead Span (m)	Line Angle (deg)	Structure Type
225	85657.582	551809.765	5973130.988	262.507	814	37.5186	W1D
226	86016.685	551975.474	5972812.404	263.817		W1A	
227	86267.655	552091.284	5972589.753	265.791		-5.5894	W1B
228	86471.309	552202.411	5972419.09	264.031		W1D	
Coste Estimate-Previous Alignment							
Item	Installation Type	Average Price	Unit	Quantity	Cost		
RoW Clearing			per km	0.814			
Access			per Str	4			
Foundation (W1A)	Normal Instalation		per Str	1			
Foundation (W1B)	Normal Instalation		per Str	1			
Foundation (W1C)	Normal Instalation		per Str				
Foundation (W1D)	Normal Instalation		per Str	2			
Foundation (W1E)	Normal Instalation		per Str				
Str. Assembly (W1A)	Normal Instalation		per Str	1			
Str. Assembly (W1B)	Normal Instalation		per Str	1			
Str. Assembly (W1C)	Normal Instalation		per Str				
Str. Assembly (W1D)	Normal Instalation		per Str	2			
Str. Assembly (W1E)	Normal Instalation		per Str				
Grounding			km	0.814			
Dampers			per Str	4			
OPGW Accessories			per Str	4			
OPGW Installation & Testing			per km	0.814			
Conductor Installation			per km	0.814			
Structure Accessories			per Str	4			
Total=							
Re-alignment Provided by Valard							
Structure Number	Station (m)	X Easting (m)	Y Northing (m)	Centerline Z Elevation (m)	Ahead Span (m)	Line Angle (deg)	Structure Description
217	82995.783	551809.406	5973130.825	262.494	833	25.8934	W1C
218	83226.801	551955.123	5972951.559	262.598		W1A	
219	83525.995	552143.841	5972719.39	266.053		W1A	
220	83813.157	552324.97	5972496.558	266.234		11.2118	W1D

Coste Estimate-Re-Alignment					
Item	Installation Type	Average Price	Unit	Quantity	Cost
RoW Clearing			per km	0.833	
Access			per Str	4	
Foundation (W1A)	Normal Instalation		per Str	2	
Foundation (W1B)	Normal Instalation		per Str		
Foundation (W1C)	Normal Instalation		per Str	1	
Foundation (W1D)	Normal Instalation		per Str	1	
Foundation (W1E)	Normal Instalation		per Str		
Str. Assembly (W1A)	Normal Instalation		per Str	2	
Str. Assembly (W1B)	Normal Instalation		per Str		
Str. Assembly (W1C)	Normal Instalation		per Str	1	
Str. Assembly (W1D)	Normal Instalation		per Str	1	
Str. Assembly (W1E)	Normal Instalation		per Str		
Grounding			per km	0.833	
Dampers			per Str	4	
OPGW Accessories			per Str	4	
OPGW Installation & Testing			per km	0.833	
Conductor Installation			per km	0.833	
Structure Accessories			per Str	4	
				Total	
				Difference	

3. Cost Comparison



**The remainder of this attachment (i.e. pages 50 to 84) has been filed
confidentially in accordance with the Practice Direction on
Confidential Filings.**

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Reference: Exhibit B / Tab 1 / Schedule 5 / page 17 / Table 5
Exhibit A / Tab 3 / Schedule 1 / page 20

Preamble: As at May 31, 2022, WPLP had executed or was in the process of executing EPC change orders in the amount of \$24.7 million, leaving a contingency allowance of \$93.5 million.

A contingency amount of \$48,075,777 was removed from the 2022 rate base and deferred and tracked in the Deferred Contingency Deferral Account (DCDA). WPLP has proposed an additional contingency amount be removed from the 2023 rate base and deferred and tracked in the DCDA for a total amount of \$65,375,502.

The settlement agreement stated that future transmission rate applications, for years in which additional transmission line segments and stations will be placed into service, will include detailed information on variance and the use of contingency amounts for such line segments and stations being placed into service, relative to both the values presented in the respective application and the values that were presented in Leave to Construct (LTC) proceeding.

Question(s):

- a) Please provide how much of the contingency amount of \$48,075,777 is included in the \$24.7 million of change orders in Table 5. Please explain if and by how much this will impact the DCDA for the amount removed from the 2022 rate base.
- b) Please confirm the expected amount of the \$93.5 million contingency remaining after the 2022 and 2023 amounts have been removed from the rate base. Please explain if this is considered adequate and if so why, to cover all remaining contingencies until the transmission system is in-service.
- c) Please provide the contingency amount for each of the 10 line sections and 5 stations that are expected to come into service in 2023 including detailed information on variance and the use of contingency amounts relative to both the values presented in this application and the values that were presented in the LTC proceeding.

Response:

- a) WPLP is forecasting to use \$1.39 million of the \$48,075,777 million contingency amount for purposes of the change orders referred to in Table 5. This forecast does not take into consideration the risks still under negotiation between WPLP and Valard. Utilizing \$1.39

million of the contingency amount will have an estimated impact of \$0.11 million on the DCDA based on the actual cost of capital (ROE and Interest) and depreciation.

Please refer to OEB Staff IR 8 for additional information.

- b) Contingency is determined based on the risks known at a specific point in time. As of July 1, 2022, WPLP calculated a required contingency for the remainder of the Project of \$93.5 million. As noted in Exhibit H-1-1, WPLP has estimated \$65.4 million dollars of the contingency relates to 2022 and 2023. This estimate includes the \$48.1 million approved in the 2022 rate application and the \$17.3 million requested for 2023, as shown in the table in part (c), below. Assuming all other things remain equal, the expected portion of the \$93.5 million contingency remaining after the 2022 and 2023 amounts have been removed from the rate base is \$28.1 million. Based on information available as of October 6, 2022, and assuming all other things remain equal, the \$28.1 million in contingency should be adequate until the remaining sections of the transmission system are in-service. WPLP will revisit the QRA and contingency once assets are in for 2022 and 2023 and evaluate based on the project risks known at that time.

Please refer to OEB Staff IR 8 for additional information, where WPLP provides the current QRA analysis and notes risks that are still under negotiation with Valard and have not been included in the contingency calculation.

- c) The following table provides the contingency amounts for each of the 10 line sections and 5 stations that are expected to come into service in 2023 including the contingency values presented in LTC proceeding.

Asset Designation	Description	Contingency	Contingency Utilization	Remaining Contingency	LTC Contingency ¹
Line WJK	115 kV - Kingfisher Lake TS to Wawakapewin TS				9,113
Line WK1 (25kV)	25 kV - Wawakapewin TS to HORCI Wawakapewin				226
Line DE	115 kV - North Caribou Lake TS to Muskrat Dam TS				8,998
Line E1 (25kV)	25 kV - Muskrat Dam TS to HORCI Muskrat Ram				272
Line EF	115 kV - Muskrat Dam TS to Bearskin Lake TS				7,288
Line F1 (25kV)	25 kV - Bearskin Lake TS to HORCI Bearskin Lake				23

¹ As noted in EB-2018-0190, Exhibit C-8-1, a general contingency of 20% was used. WPLP did not calculate a contingency for each line and station component. In order to provide a value for comparison WPLP applied 20% to the forecasted respective line segment and substation value included in the financial model used to calculate the LTC values.

² Negative contingency utilization is reflective of project savings.

Line JI	44 kV - Kingfisher TS to Wunnumin TS		3,611
Line II (25kV)	25 kV - Wunnumin TS to HORCI Wunnumin		45
Line KL	44 kV - Wawakapewin TS to Kasabonika TS		2,855
Line L1 (25kV)	25 kV - Kasabonika TS to HORCI Kasabonika		91
Station E	Muskrat Dam TS		2,509
Station F	Bearskin Lake TS		1,691
Station K	Wawakapewin TS		2,505
Station I	Wunnumin Lake TS		1,006
Station L	Kasabonika Lake TS		1,014
			41,248

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Reference: Exhibit B / Tab 1 / Schedule 5 / page 17

Preamble: WPLP shows a total Contingency plus Change Order costs of \$118.2 million stating that as identified risks to the project materialize into change orders, or the likelihood and/or magnitude of impacts decrease through the Quantitative Risk Assessment process, contingency is reduced.

Question(s):

- a) Based on the above statement, please confirm the contingency cost is to be reduced by \$24.7 million and the total contingency cost is now calculated as \$68.8 million (\$93.5 million - \$24.7 million). If not, please explain why not.

Response:

- a) The available contingency is \$118.211 million. The \$24.7 million is the forecasted contingency utilization. Assuming the full \$24.7 million is utilized the remaining contingency would be \$93.5 million.

The \$68.8 million calculation referred to in the question is not the appropriate remaining contingency balance. The calculation above incorrectly assumes available contingency is \$93.5 million, and by reducing the contingency by \$24.7 million, the balance would be double counting the utilized contingency (\$118.2 million less \$24.7 million = \$93.5 million less \$24.7 million = \$68.8 million).

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Reference: Exhibit B / Tab 1 / Schedule 5 / page 8 / Table 3
Exhibit B / Tab 1 / Schedule 5 / pages 13-16

Preamble: Non-EPC capital costs for the “Engineering, Design, Project/Construction Management & Procurement” category are approximately \$6.3 million lower when compared with the equivalent estimate in the 2022 rate application.

Non-EPC capital costs for the “Land Rights” category are approximately \$1.4 million lower when compared with the equivalent estimate in the 2022 rate application. WPLP attributes the lower costs in this category to delays in incurring certain land costs due to changes in the construction schedule.

Question(s):

- a) Please explain why the non-EPC costs for the “Engineering, Design, Project/Construction Management & Procurement” category are lower. If there are multiple drivers involved, please provide a breakdown attributing the cost reduction with the appropriate driver.
- b) Please elaborate further on the reduced non-EPC cost estimate for the “Land Rights” category.
- c) Which specific “lands” is the reduction attributable to?
- d) Please explain how “delays in incurring certain land costs” is resulting in reduced land rights costs for the full project.
- e) When does WPLP expect to incur the delayed land costs?

Response:

- a) There were multiple drivers for the cost savings identified in Engineering, Design, Project/Construction Management & Procurement. The significant drivers were: (1) Internal labour savings due to delays in hiring in 2021, which provided cost savings of \$1.28 million, (2) Owner’s Engineer/Independent Engineer savings due to WPLP’s cost management measures, which provided savings of \$3.35 million, (3) Travel savings due to restrictions to travel, reduced meetings and events, which resulted in savings of \$1.59 million.
- b) WPLP experienced savings within the Land Rights category because the costs for certain land rights were not incurred until construction commenced.

- c) The reduction is attributable to lands required for and impacted by the Remote Connection Lines and which are within the area of land covered by Treaties 3, 5 and 9, which Treaties were made between the Crown and Anishinabe and Anishinnuwug signatories in 1873 (Treaty 3), 1875 with adhesions in 1889 (Treaty 5) and in 1905-6 with adhesions in 1929-30 (Treaty 9).
- d) During the construction period these costs are capitalized as they support construction activity, as a result any savings would result in reduced land right costs for the full project. See response (b), above.
- e) WPLP does not expect to incur the land costs in respect of the period of the delay. Please refer to response (b), above.

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Reference: Exhibit B / Tab 1 / Schedule 5 / page 8 / Table 3
Exhibit B / Tab 1 / Schedule 5 / pages 18-22

Preamble: Capital costs related to the capitalized interest category are approximately \$14.1 million higher when compared with the equivalent estimate in the initial rate application. WPLP states that the increase in costs are primarily due to changes in construction schedule leading to assets going in-service at a later date and thereby causing more interest to be capitalized. WPLP also notes that rising interest rates are also causing costs to increase.

Capital costs related to the “Other Infrastructure” category are approximately \$27.3 million lower when compared with the equivalent estimate in the initial rate application. The reduction in costs is mainly attributable to a delay in the construction of WPLP’s main operating centre, backup operating centre and two service centres. WPLP states that these specific facilities will be constructed and put into service outside of the Project construction period.

Question(s):

- a) What portion of the \$14.1 million increase in capitalized interest costs is attributable to construction schedule changes and what portion is attributable to interest rate increases?
- b) WPLP states that the reduction in costs for the “Other infrastructure” category are mainly attributable to a delay in the construction of WPLP’s main operating centre, backup operating centre and two service centres. When does WPLP expect to have these facilities in service? What would be the cost impact of the delayed construction of these facilities?

Response:

- a) Of the \$14.1 million increase in capitalized interest costs, \$9.92 million is attributable to construction schedule changes and \$4.18 million is attributable to rising interest rates.
- b) Please refer to response to OEB Staff 9 (c) regarding the main operating centre and the backup operating centre. The need for the two service centres are currently being evaluated and, for budgeting purposes, WPLP has planned to construct and place these facilities in service in 2025 and 2026. WPLP will continue to evaluate the construction of the services center once the IMER Agreement is executed.¹ WPLP believes the cost impact would be minimal or result in an overall saving in the cost of construction. WPLP expects that

¹ See Exhibit B-1-4, p. 13.

initiating construction of these facilities during the pandemic would have added costs related to procurement and managing COVID-19 restrictions and supply chain issues.

The immediate cost impact, with respect to the 2023 test year, is that delaying the construction of these facilities reduces WPLP's rate base and revenue requirement.

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Reference: Exhibit B / Tab 1 / Schedule 5 / page 23 / Appendix A / Table A-1

Preamble: The above reference outlines WPLP’s forecast of its general overhead costs. The references notes that “Overhead costs are comprised of costs such as internal labour (including departmental costs and overheads), services provided by third party consultants and professionals of a general nature, costs related to continued Indigenous engagement and participation in the project, general administrative costs and stakeholder engagement costs”.

Question(s):

- a) Please provide additional details with regards to the overhead costs outlined in Table A-1. When responding please provide a more detailed breakdown of the different categories listed.
- b) For each of the subcategories, please provide a description of work associated and an explanation as to why it has been categorized as “general” costs, as opposed to capital or operating costs.

Response:

a) and b) The table below provides additional details with regards to the overhead costs, along with a more detailed breakdown of the different categories of overhead costs, the description of work associated with these categories and an explanation as to why the overhead costs have been categorized as “general”.

Overhead Costs for 2019-2024 (\$000s)			
Labour and Departmental Costs			
	Labour and Affiliate Services	34,275	These costs are associated with labour and affiliate services for Executives, Finance, Environment, Health & Safety, Engineering, Human Resources, IT and Communications. As these functions work on Capital Project and Operations, the costs for these functions are categorized as general.
	Equipment and Supplies	772	
	Software	215	Travel, training and equipment costs related to the departments listed above. Given departments work on both Capital Project and Operations, costs are categorized as general.
	Meetings	1,252	
	Training	418	

	Travel	6,004	
	Rents	8,488	Land costs for the project which include both Capital and Operating segments and are therefore categorized as general to allow for appropriate allocation when assets come into service.
	Other	398	
		51,822	
	Environmental Services	5,332	General environmental supports through contracted services related to permit updates, GIS services and provisional amounts for EA updates/amendments. Services are used by both operating teams and construction team.
	Other Consultants (Allocate)		
	Legal	1,485	Legal supports related to general corporate matters of WPLP. Legal supports specifically related to Capital matters are excluded from this category.
	Advisory Services	4,779	Advisory services related to financial modeling (capital and operating activities), Indigenous lands, section 28(2) permits, Indigenous work plans. In years 2019-2021, Advisory Services also included specific archeological work and Surveying costs that based on the allocation methodology is all allocated to Capital in those years given no transmission assets were in service. In addition, in years 2022-2024 Advisory Services include more monitoring-based programs required under the EA in areas of Project impact.
	Audit Fees	318	Corporate audit fees
	IT Support Services	289	Includes general IT support services for WPLP construction, operational and general employees.
	Other	455	General provisions for third party contracted services including Health & Safety equipment inspections, recruitment supports, accounting software consultants, translation services etc.
		7,326	
	Indigenous Engagement & Communications		Indigenous Engagement services and activities, including related meetings and travel expenses, to ensure appropriate communication of capital project activities and operating activities/outages to mitigate potential access issues and community impacts. Affiliate services include affiliate labour
	Affiliate Services	5,671	
	Contracted Services	8,740	
	Meetings	1,942	
	Travel	780	

	Other	1,047	costs and contracted service costs include community and tribal council supports. Engagement activities include updates on all aspects of WPLP including both operations and construction, therefore is classified as general.
		18,180	
Stakeholder Engagement			Stakeholder Engagement services and activities, including related meetings and travel expenses, to ensure both capital project and operations activities are appropriately communicated with WPLP's stakeholders.
	Affiliate Services	74	
	Contracted Services	38	
	Meetings	0	
	Travel	112	
	Other	313	
		537	
Indigenous Participation and Training			Indigenous Participation and Training services and activities, including related meetings and travel expenses, for developing and implementing training and business readiness programs to ensure there is local capacity for both the construction and operation of the transmission system.
	Affiliate Services	8,684	
	Contracted Services	6,898	
	Meetings	1,450	
	Travel	1,706	
	Other	1,034	
		19,771	
Administrative Costs			Overall general administrative costs for office space and materials. Given the office space and materials are shared for both construction and operation efforts, the costs are classified as general overhead.
	Affiliate Services	6,759	
	Office Supplies	1,014	
	Rent	852	
	Utilities	108	
	Other	105	
		8,838	
Total		111,806	

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Reference: Exhibit C / Tab 6 / Schedule 1
Exhibit B / Tab 1 / Schedule 5 / page 26

Preamble: In reference 1, WPLP stated that costs included in the carrying amount of property, plant and equipment include expenditures that are directly attributable to the acquisition or construction of the asset. In reference 2, as part of Table A-4, Indigenous Engagement and Communications costs and Indigenous Participation and Training costs have been capitalized.

Question(s):

- a) Please explain how are the expenditures described in reference 2 directly attributable to the construction of the assets?

Response:

- a) The costs incurred or to be incurred by WPLP in respect of Indigenous Engagement and Communication, as well as for Indigenous Participation and Training, are necessary and important for effective project execution and construction of the project assets.

In terms of Indigenous Engagement and Communication, as explained in WPLP's leave to construct application,¹ WPLP has a legal obligation to undertake consultation activities pursuant to a 2016 Memorandum of Understanding in which the Ministry of Energy delegated certain procedural aspects of the duty to consult to WPLP (the "Consultation MOU"). WPLP developed and has been implementing an Aboriginal Engagement Plan to fulfill its obligations under the Consultation MOU. A significant amount of the Indigenous Engagement and Communication that WPLP has undertaken is in relation to this Aboriginal Engagement Plan and the Consultation MOU and is therefore required for construction of the project assets.

In addition, as the project is being constructed on the Homelands of many First Nations, effective and ongoing engagement and communications with these First Nations has been and continues to be necessary and has assisted Valard in being able to progress with construction within those Homelands.

The activities for which these costs are incurred help ensure that (i) the impacted First Nations have meaningful opportunities to help WPLP and Valard identify potential impacts and mitigation measures at different stages of the project, (ii) First Nations are aware of all construction activities on their Homelands, and (iii) that construction activities can progress

¹ See Exhibit I, Tab 3, Schedule 1, EB-2018-0190, filed October 5, 2018.

in accordance with construction plans. WPLP's commitment to comprehensive and effective Indigenous engagement, including through the responsibilities for engagement that it has assigned to its EPC Contractor (Valard) under the EPC Contract, is an investment that helps to minimize project risks. Where WPLP has required routing changes due to construction or environmental considerations, effective Indigenous engagement and communications have enabled such concerns to be effectively identified and appropriate solutions to be developed with the support of impacted communities.

The fact that WPLP is majority-owned by the Participating First Nations does not mean that engagement efforts are not required. The above efforts in regards to Indigenous Engagement and Communication have been essential to the development and construction of the project.

Indigenous Participation and Training are necessary for and directly attributable to construction of the project assets. In particular, these activities ensure the EPC Contractor (Valard) has access to sufficient qualified local employees (Participating First Nation members) and local Participating First Nation subcontractors. The availability of local personnel and subcontractor resources for the EPC Contractor (Valard) reduces the overall cost of the Project, while ensuring capacity building within the local First Nation communities. Please see HONI IR 1(a) for further information on WPLP's capacity building efforts for both personnel and subcontractors. Enhancing the availability of local personnel and subcontractors is also expected to provide resources and savings to WPLP over the long-term. Without WPLP's investments in Indigenous Participation and Training, the EPC Contractor would have had to perform the corresponding functions and activities (training and sourcing of qualified subcontractors) as part of its responsibilities under the EPC Contract, which would have resulted in an overall increase in cost to ratepayers and a potential increase in the overall risk of the project.

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Reference: Exhibit B / Tab 1 / Schedule 5 / page 26

Preamble: WPLP indicates the allocation of forecasted overhead costs result from applying the allocation and capitalization factors from Table A-3 to the overhead costs in Table A-1. The results are summarized in Table A-4. OEB staff modified a version of Table A-4 including the percentages of overheads capitalized vs expensed (OM&A) that are calculated by OEB staff.

Table A-4 (modified) Allocation of Forecasted Overhead Costs

Category	Item	A	B	C	D	E
		Forecasted Overhead Costs 2019-2024 (\$000's)				
		Capital	%	OM&A	%	Total
Overhead	Labour and Departmental Costs	\$33,503	64.7%	\$18,319	35.3%	\$51,822
	Environmental Services	\$4,598	86.2%	\$735	13.8%	\$5,332
	Other Consultants (Allocate)	\$5,717	78.0%	\$1,609	22.0%	\$7,326
	Indigenous Engagement & Communications	\$11,738	64.6%	\$6,442	35.4%	\$18,180
	Stakeholder Engagement	\$426	79.3%	\$111	20.7%	\$537
	Indigenous Participation and Training	\$14,134	71.5%	\$5,637	28.5%	\$19,771
	Administrative Costs	\$6,224	70.4%	\$2,614	29.6%	\$8,838
	Total	\$76,339			\$35,468	

Question(s):

- a) The percentages calculated by OEB staff in the Table above do not reconcile with those presented in Table A-3 included in the filed evidence. Please explain why the percentages presented in the Table above are different from those in Table A-3.

Response:

- a) OEB staff's modified allocation of forecasted Overhead costs, above, assumes a straight-line approach to overhead cost spend and is not an accurate representation of how costs are

incurred. The allocation of overhead costs is dependent on when costs are incurred and the varying allocation percentage applied to the corresponding period. Given Table A-1 above presents costs from 2019-2024, the timing of expenses in the different categories will cause variances in percentages presented above. As stated in Exhibit B-1-5, p. 23, “WPLP calculated the costs identified in Table A-1 on a quarterly basis from Q1 2019 to Q4 2024, and the resulting costs for each quarter are multiplied by allocation factors that are determined based on the relative percentage of assets in-service in each month”.

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Reference: Exhibit C / Tab 2 / Schedule 1 / pages 2 to 4 / Table 1

Preamble: Table 1 outlines 2023 transmission system in-service additions by asset. Line WJK has a cost of \$0.68 million per km, Line DE has a cost of \$0.74 million per km and Line KL (115 kV - Wawakapewin TS to Kasabonika TS) appears to have a cost of \$0.57 million per km estimated based on the values in Tables 1 and 3.

Question(s):

- a) Please comment on why Line WJK (115 kV- Kingfisher Lake TS to Wawakapewin TS) and Line DE (115 kV- North Caribou Lake TS to Muskrat Dam TS) appear to have a higher cost per km relative to the other lines.
- b) Please comment on why Station E (Muskrat Dam TS) and Station L (Kasabonika Lake TS) have a higher cost than the other stations in Table 1.

Response:

- a) Unit costs vary based on a combination of voltage level, accessibility and remoteness (e.g. distance from camps, roads, communities). Table 1 in Exhibit C-2-1 incorrectly lists certain 44 kV line segments (i.e. JI and KL) as operating at 115 kV. The table below compares the unit costs of the line segments listed in the preamble with other line segments of the same voltage class.

Asset Designation	Description	2023 In-Service Additions	Voltage (kV)	Line Length (km)	Cost/km (\$000's)	Unit Cost Notes
Line WEF	115 kV - Muskrat Dam TS to Bearskin Lake TS	41,833	115	63.7	657	Better access and shorter distance from camps compared to WJK and WDE
Line WJK	115 kV - Kingfisher Lake TS to Wawakapewin TS	57,939	115	84.7	684	Unit costs for longer 115 kV segments with more difficult access are comparable
Line WDE	115 kV - North Caribou Lake TS to Muskrat Dam TS	73,553	115	99.5	739	
Line WKL	44 kV - Wawakapewin TS to Kasabonika TS	22,150	44	39	568	Unit costs are comparable
Line WJI	44 kV - Kingfisher TS to Wunnumin TS	33,632	44	54.6	616	

- b) The individual station amounts in Table 1 in Exhibit C-2-1 were incorrectly entered in the table. Table below reproduces Table 1 in Exhibit C-2-1 with the corrected values and updated descriptions.¹

With reference to the table below, Stations E and K have the higher costs, rather than Stations E and L.² The higher costs of Stations E and K are a result of the increased functionality provided at these stations, combining switching station and transformer station functionality. Both stations provide a combination of switching and protection for incoming and outgoing transmission lines (115 kV ring buses), variable reactive power support (2 variable reactors at Station E and one at Station K), and transformation to lower voltage levels (including transformation to both 44 kV and 25 kV at Station K). In contrast, Stations F, I and L provide transformer station functionality only at the end of various branches of the transmission system. There is therefore no requirement for High Voltage ring buses, which results in a comparatively smaller footprint and fewer assets as compared to Substations E and K. Regarding the cost difference of Station F over Station I and L, this is driven by Station F having a fixed reactor and being at 115kV, relative to Stations I and L being 44kV without reactors.

Asset Designation	Description	2023 In-Service Additions (\$000's)
Line WJK	115 kV - Kingfisher Lake TS to Wawakapewin TS	57,939
Line WK1 (25kV)	25 kV - Wawakapewin TS to HORCI Wawakapewin	1,976
Line WDE	115 kV - North Caribou Lake TS to Muskrat Dam TS	73,553
Line E1 (25kV)	25 kV - Muskrat Dam TS to HORCI Muskrat Ram	7,289
Line WEF	115 kV - Muskrat Dam TS to Bearskin Lake TS	41,833
Line F1 (25kV)	25 kV - Bearskin Lake TS to HORCI Bearskin Lake	371
Line WJI	44 kV - Kingfisher TS to Wunnumin TS	33,632
Line I1 (25kV)	25 kV - Wunnumin TS to HORCI Wunnumin	1,246
Line WKL	44 kV - Wawakapewin TS to Kasabonika TS	22,150
Line L1 (25kV)	25 kV - Kasabonika TS to HORCI Kasabonika	2,219
<i>Subtotal RCL Lines</i>		<i>242,209</i>
Station E	Muskrat Dam TS	28,097
Station F	Bearskin Lake TS	19,696
Station K	Wawakapewin TS	25,760

¹ The updated table also corrects the voltage class for 44 kV line segments discussed in part (a) above and adds the 'W' prefix for 44 kV and 115 kV line segments for consistency with operating designations.

² WPLP notes that the sub-totals and totals for 2023 in-service additions were correct in the application and are not affected by the updated individual station amounts below.

Asset Designation	Description	2023 In-Service Additions (\$000's)
Station I	Wunnumin Lake TS	16,920
Station L	Kasabonika Lake TS	16,557
<i>Subtotal RCL Stations</i>		<i>107,031</i>
Total Transmission System In-Service Additions		349,240

BOARD STAFF - 21

Reference: Exhibit C / Tab 2 / Schedule 1 / Tables 5 to 9

Preamble: WPLP states that the cost impacts of the 2021 forest fires are not yet known as WPLP and Valard continue to negotiate the proposed Change Orders.

Question(s):

- a) Please confirm if the cost impacts of the 2021 forest fires have been finalized. If so, please update Tables 5 to 9 accordingly.
 - b) If not, please advise as to when WPLP expects the 2021 forest fire costs to be finalized.
-

Response:

- a) The cost impacts of the 2021 forest fires have not been finalized.
- b) WPLP has been working with Valard to finalize the 2021 forest fire costs. The parties disagree on the amount that Valard should be entitled to as it relates to cost and schedule relief under the EPC Contract. WPLP hopes to have the cost and schedule impact finalized in 2023 but the impacts could potentially not be finalized until after 2023.

BOARD STAFF - 22

Reference: Exhibit C / Tab 2 / Schedule 1 / page 14 / Table A-2

Preamble: WPLP provides for each of the lines segments and stations placed in service in 2023 the proportional allocation of general capital costs, change orders and additions to fixed asset accounts in Table A-2.

WPLP, in its initial rate application¹, provided for each of the line segments and stations to be placed in service in 2022 the proportional allocation of general capital costs, change orders and additions to fixed asset accounts in Table A-2.

Question(s):

- a) Please provide the contingency amounts for each of the lines segments and stations placed in service in 2023.
- b) Please update the additions to fixed asset accounts in Table A-2 to include the contingency amounts.
- c) Please explain any material variances between the updated additions to fixed asset accounts for each line segment and station in question b) to be placed into service in 2023 and the additions to fixed asset account in the initial April 2021 rate application. (Exclude line segments KL and L1 and station L)

Response:

- a) Please refer to the table produced in response to part (b) below. Note that the Contingency column does not account for planned or executed Change Orders.
- b) Please see updated table below with Contingency added to fixed asset accounts.

Asset Designation	EPC Base Amount	% of EPC Costs	Proportional Allocation of General Capital Costs	Change Orders	Contingency	Additions to Fixed Asset Accounts
	A	B = A / 1,419,979	C = B * 225,078	D	E	F = A + C + D + E
Line WJK	50,176	3.53%	8,014	-251		
Line WK1 (25kV)	1,704	0.12%	272	0		
Line DE	55,646	3.92%	8,888	9,019		
Line E1 (25kV)	5,497	0.39%	878	915		
Line EF	36,037	2.54%	5,756	41		
Line F1 (25kV)	320	0.02%	51	0		
Line JI (44kV)	28,584	2.01%	4,565	482		
Line I1 (25kV)	1,065	0.07%	170	11		
Line KL (44kV)	18,822	1.33%	3,006	323		
Line L1 (25kV)	1,914	0.13%	306	0		
Station E	24,118	1.70%	3,852	126		
Station F	16,667	1.17%	2,662	368		
Station K	22,120	1.56%	3,533	107		
Station I	14,467	1.02%	2,311	143		
Station L	14,142	1.00%	2,259	157		
Total	291,278	20.51%	46,521	11,440		

c) The table below shows the variances between the initial April 2021 rate application and the updated fixed asset accounts provided in Table above.

Asset Designation	Additions to Fixed Asset Accounts	Additions to Fixed Asset Accounts	Variance	Ref
	F (from above)	2022 Initial Rate Application		
Line WJK		62,033		(A)
Line WK1 (25kV)		2,107		
Line DE		68,795		(B)
Line E1 (25kV)		6,796		(C)
Line EF		44,552		(D)
Line F1 (25kV)		395		
Line JI (44kV)		35,339		
Line I1 (25kV)		1,317		
Line KL (44kV)		Not Available		
Line L1 (25kV)		Not Available		
Station E		29,817		
Station F		20,605		
Station K		27,347		
Station I		17,885		
Station L		Not Available		

(A) Cost reduction is driven by routing change order (-\$0.3 million) and Non-EPC cost savings (-\$0.8 million).

[REDACTED]

(C) Cost increase is driven by routing change order (\$0.9 million), as further discussed in OEB Staff IR 3(e) and OEB Staff 12(c). Cost is then offset by Non-EPC cost savings (\$0.08 million).

(D) Cost decrease is a result of cost savings in Non-EPC costs reducing the proportionate allocation of general costs to the line segment.

BOARD STAFF - 23

Reference: WPLP_C-3-1_2023 FA Cont_Depr Sch_20220706.xlsb

Question(s):

- a) Please explain the nature of the disposal amount captured in cell F47 tab 2022 Combined of the reference.

Response:

- a) WPLP did not update the amount referenced when updating the evidence for the May 30, 2022 schedule. In a Live Excel, WPLP provides an updated schedule with the appropriate amount. The amount in question should be the total additions to rate base in the year. As assets are added to rate base, they are removed from the CWIP balance. The change does not impact rate base or revenue requirement calculations in the current rate application.

BOARD STAFF - 24

Reference: Exhibit E / Tab 1 / Schedule 1 / pages 3-4

Preamble: The above reference outlines WPLP's approach to load forecasting

Question(s):

- a) Please comment on the extent to which data and information from Independent Power Authorities (IPAs) has been used to develop WPLP's load forecasts.

Response:

- a) Information from IPA's is generally not available at a level that would support the development of monthly peak demand forecasts. As a result, WPLP relied on information previously obtained by the IESO/OPA, updated and adjusted to the extent possible using data provided by HORCI for similar-sized communities.

BOARD STAFF - 25

Reference: Exhibit F / Tab 2 / Schedule 1 / pages 1-2

Preamble: The 2023 test year is the second year in which WPLP has transmission assets coming into service, and therefore it is the second year in which WPLP is seeking to recover OM&A expenses through its transmission revenue requirement.

WPLP has no historical rate years and provides variance analysis only in respect of the changes in OM&A expenses from the 2022 bridge year to the 2023 test year.

The 2022 total OM&A expense shown in Table 2 of F-2-1 are used as the starting point for 2023 OM&A cost driver analysis in WPLP's application for approval of a 2023 test year revenue requirement.

Question(s):

- a) Please file a complete five-year OM&A forecast by replicating Table 2 for the years 2024 to 2026, if possible. If not possible, please explain what information is outstanding that prevents WPLP from providing a five-year OM&A forecast now.

Response:

- a) The table below provides a complete five-year OM&A forecast.

Given that (i) WPLP is still negotiating with the preferred contractor in its RFP process for a service provider to provide Inspection, Maintenance and Emergency Response services¹, and (ii) energization dates may change as construction progresses, the 2024-2026 OM&A forecast is subject to change.

¹ See Exhibit B-1-4, p. 13.

	Cost Driver Description	2022 OM&A	2023 OM&A Cost Driver (\$000's)				2024 OM&A Cost Driver (\$000's)			
			Operations	Maintenance	Administration	Total	Operations	Maintenance	Administration	Total
Direct Operating	Direct O&M Labour	0	159	159	0	317	162	162	0	323
	Controlling Authority (3rd Party)	306	3,120	0	0	3,120	5,356	0	0	5,356
	Substation and Line Routine Maintenance	532	1,463	0	0	1,463	3,598	0	0	3,598
	Emergency Response	1558	0	1,976	0	1,976	0	3,284	0	3,284
	Forestry	10	0	506	0	506	0	767	0	767
	Other (Material, Fleet, Insurance)	596	429	249	308	987	485	342	431	1,257
	<i>Sub-Total</i>	<i>3,002</i>	<i>5,171</i>	<i>2,890</i>	<i>308</i>	<i>8,369</i>	<i>9,601</i>	<i>4,554</i>	<i>431</i>	<i>14,586</i>
Overhead Costs Allocated to OM&A	Labour and Departmental Costs	3218	363	0	5,963	6,326	577	0	9,351	9,927
	Environmental Services	146	0	0	247	247	0	0	404	404
	Other Consultants (Allocate)	358	0	0	630	630	0	0	613	613
	Indigenous Engagement & Communications	1300	0	0	2,275	2,275	0	0	3,462	3,462
	Stakeholder Engagement	29	0	0	54	54	0	0	41	41
	Indigenous Participation and Training	921	0	0	2,142	2,142	0	0	2,850	2,850
	Administrative Costs	467	0	0	878	878	0	0	1,434	1,434
<i>Sub-Total</i>	<i>6,439</i>	<i>363</i>	<i>0</i>	<i>12,188</i>	<i>12,551</i>	<i>577</i>	<i>0</i>	<i>18,154</i>	<i>18,731</i>	
Total	9,441	5,533	2,890	12,496	20,920	10,178	4,554	18,585	33,317	

	Cost Driver Description	2025 OM&A Cost Driver (\$000's)				2026 OM&A Cost Driver (\$000's)			
		Operations	Maintenance	Administration	Total	Operations	Maintenance	Administration	Total
Direct Operating	Direct O&M Labour	165	165	0	330	168	168	0	337
	Controlling Authority (3rd Party)	5,346	0	0	5,346	5,445	0	0	5,445
	Substation and Line Routine Maintenance	5,343	0	0	5,343	7,226	0	0	7,226
	Emergency Response	0	3,613	0	3,613	0	3,703	0	3,703
	Forestry	0	1,120	0	1,120	0	2,545	0	2,545
	Other (Material, Fleet, Insurance)	487	348	439	1,275	489	355	447	1,291
	<i>Sub-Total</i>	<i>11,341</i>	<i>5,247</i>	<i>439</i>	<i>17,027</i>	<i>13,328</i>	<i>6,771</i>	<i>447</i>	<i>20,546</i>
Overhead Costs Allocated to OM&A	Labour and Departmental Costs	684	0	8,326	9,010	697	0	8,486	9,183
	Environmental Services	0	0	479	479	0	0	489	489
	Other Consultants (Allocate)	0	0	633	633	0	0	646	646
	Indigenous Engagement & Communications	0	0	4,104	4,104	0	0	4,186	4,186
	Stakeholder Engagement	0	0	48	48	0	0	49	49
	Indigenous Participation and Training	0	0	3,378	3,378	0	0	3,445	3,445
	Administrative Costs	0	0	1,700	1,700	0	0	1,734	1,734
<i>Sub-Total</i>	<i>684</i>	<i>0</i>	<i>18,668</i>	<i>19,351</i>	<i>697</i>	<i>0</i>	<i>19,034</i>	<i>19,732</i>	
Total		12,025	5,247	19,106	36,378	14,026	6,771	19,481	40,277

BOARD STAFF - 26

Reference: Exhibit F / Tab 2 / Schedule 1 / pages 2-5

Preamble: WPLP provides a summary of its 2023 OM&A forecast in Table 2 of Exhibit F-2-1. As the construction phase of WPLP's Transmission Project progresses and assets come into service during the 2022-2024 period, a progressively larger portion of these overhead costs transition from being directly attributable to capital development and construction activity to being attributable to the ongoing operation and maintenance of in-service assets. WPLP developed a methodology to allocate these costs between capital and OM&A, which is described in detail in Appendix 'A' of Exhibit B-1-5. Applying the allocation methodology to WPLP's 2023 forecasted overhead costs results in the following total indirect operating expenses of approximately \$12.5 million, which is broken down into five categories of expenses:

- Approximately \$6.3 million for labour costs, including related overheads
- Approximately \$0.9 million for environmental and other consultants
- Approximately \$2.3 million for Indigenous engagement and communications and stakeholder engagement
- Approximately \$2.1 million for Indigenous participation and training
- Approximately \$0.9 million for general administrative costs

Question(s):

- a) For each of the five categories of expenses for indirect operating costs, please provide a detailed breakdown of the items and costs.
- b) For each of the five categories of expenses for indirect operating costs please explain how WPLP determined that the costs allocated by its methodology are reasonable.

Response:

- a) A detailed breakdown of the items and costs for each of the five categories of expenses for indirect operating costs is provided in the below table.

Category of Expense	\$ (000's)
Labour and Departmental Costs	

Labour	3,111
Affiliate Services	842
Equipment and Supplies	86
Travel	908
Rents	1,062
Other	317
	6,326
Environmental & Other Consultants	
Environmental Advisors	501
Legal	189
Audit Fees	108
Other	79
	877
Indigenous Engagement & Communications and Stakeholder Engagement	
Affiliate Services	662
Contracted Services	1,077
Meetings	304
Travel	87
Other	199
	2,329¹
Indigenous Participation and Training	
Affiliate Services	850
Contracted Services	930
Meetings	166
Travel	92
Other	104
	2,142
Administrative Costs	
Affiliate Services	625
Office Supplies	128
Rent	78
Utilities	28
Other	19
	878
Total	12,551

¹ Line item groups Indigenous Engagement (\$2.275 million) with Stakeholder Engagement (\$0.054 million) displayed separately in Appendix A of Exhibit B-1-5. Response in OEB Staff 4(a) only include Indigenous engagement costs for 2023.

- b) WPLP's employee compensation framework, purchasing policies and affiliate services agreements are discussed in detail in Exhibit F-3-1. All of these elements ensure that WPLP receives the appropriate value for its total expenditures, both capital and OM&A, and that the associated costs are reasonable.

WPLP's indirect operating costs are a function of applying a cost allocation methodology to its total overhead costs, as described in the preamble. The cost allocation methodology is consistent for each of the five categories of expenses, which is based on the average value of assets in service each month. The overall overhead costs are evaluated annually to ensure reasonableness based on historical information and future expected work scope. From WPLP's perspective, the methodology is a fair representation of the time and effort spent on operational activities and construction. The methodology is consistent with WPLP's practice in prior years and has been subject to audit in accordance with Accounting Standards for Private Enterprises since the completion of Pikangikum distribution system.

In addition, WPLP obtained a benchmarking study from Clearspring Energy Advisors on OM&A spending (including indirect operating costs) which identified the OM&A costs to be reasonable. The Clearspring Benchmarking study is included as Appendix A of Exhibit F-1-1 in the 2023 rate application filing.

BOARD STAFF - 27

Reference: Exhibit F / Tab 1 / Schedule 1 / Appendix A / pages 1-4

Preamble: The Application states that WPLP's annual OM&A unit cost is 24.5% higher than the sample median in 2023 and ranging from 18.7% to 32.4% above the sample median during the 2024-2026 period. The Application states that, in Clearspring's view, the OM&A unit cost results appear reasonable given the operating challenges of WPLP.

Question(s):

- a) Please provide detailed calculations of OM&A (\$2016) per km of transmission line for WPLP's 2023 Projected Value and the sample median, including each transmitter in the comparison group, for the Table on page 2 of the reference.
- b) Please provide detailed calculations of OM&A (\$2016) per transmission station for WPLP's 2023 Projected Value and the sample median, including each transmitter in the comparison group, for the Table on page 3 of the reference.
- c) Please provide detailed calculations of OM&A (\$2016) per Output Quantity Index for WPLP's 2023 Projected Value and the sample median, including each transmitter in the comparison group, for the Table on page 4 of the reference.
- d) Please provide a revised version of the Table on page 4 of the above noted reference using only Hydro One and Five Nations Energy to calculate the sample median. Please provide the supporting calculations.
- e) Please confirm the percentage above the sample median for both transmission lines and stations at which the OM&A unit expenses for WPLP would be considered unreasonable. Please provide the rationale.

Response:

- a) Detailed calculations are provided as a live Excel on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.
- b) See part (a) above.
- c) See part (a) above.

- d) The table below shows the OM&A per Output Quantity Index benchmarking results for WPLP with only Hydro One Networks and Five Nations Energy included in the sample. The supporting calculations can be found in a live Excel spreadsheet that is being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.

	OM&A (\$2016) per Output Quantity Index	Ratio of WPLP to Sample Median
Sample Median	200.4	
WPLP 2023 Projected	242.2	1.21
WPLP 2024 Projected	257.6	1.29
WPLP 2025 Projected	230.9	1.15
WPLP 2026 Projected	252.0	1.26

- e) This cannot be confirmed as Clearspring does not consider the results to be unreasonable. There is not a definitive cut-off for reasonableness. The benchmarking results using the unit cost benchmarking approach are not able to account and adjust for several business conditions. Given the challenges faced by WPLP, the unit cost results appear reasonable.

An example might be helpful to illustrate this. Mr. Fenrick of Clearspring led the last several 3rd Generation Incentive Regulation (“3GIR”) benchmarking annual updates for the OEB over a decade ago. These updates calculated benchmarking results used to determine the stretch factors for electricity distributors. In these updates a unit cost benchmarking approach (quite similar to the one employed in Clearspring’s study for WPLP) was used and results using the econometric approach were calculated.

In the last 3GIR benchmarking update report dated November 27, 2012, Northern Ontario Wires OM&A expenses per the Output Quantity Index was 1.398 for 2009 to 2011. However, this is compared to all Ontario distributors and does not account for the business condition challenges of Northern Ontario Wires. The econometric results for Northern Ontario Wires, however, which does adjust for business condition challenges revealed a benchmarking score of 0.741 for those same years (more than 25% below cost). This ranked the utility as the second lowest cost performer in the Ontario sample of 75 utilities despite its relatively high unit cost result.¹

¹ The report can be found here: [2013 Benchmarking Stretch Factor Report 20121128.pdf \(oeb.ca\)](https://www.oeb.ca/2013/Benchmarking%20Stretch%20Factor%20Report%2020121128.pdf).

Given the above example and WPLP serving a challenging service territory, similar to Northern Ontario Wires, we would anticipate a considerable improvement in the benchmarking score for WPLP if the econometric approach was undertaken. It is unknown if the results would match the improvement seen by Northern Ontario Wires, however, even if WPLP only experienced half of the impact of changing to the econometric methodology, WPLP's benchmark score would be below 1.0.

BOARD STAFF - 28

Reference: Exhibit F / Tab 1 / Schedule 1 / Appendix A / pages 4-5
Exhibit F / Tab 2 / Schedule 1 / page 3 / Table 2

Preamble: At the first reference, the Clearspring Report states that the territory covered by WPLP's transmission system is more challenging than the typical territory covered by a Canadian transmitter included in the sample group in the OM&A benchmarking study. The Application states the following seven business condition challenges WPLP faces that the OM&A benchmarking did not adjust for: high input prices to serve remote areas, high forestation levels, remoteness, extreme weather conditions, the lack of both economics of scale and economies of scope, the transmission line spanning a large territory, and the age of WPLP's asset.

Question(s):

- a) Please estimate the annual cost for each of the seven business condition challenges WPLP faces.
- b) Please advise if the activities related to the costs associated with Indigenous engagement and communication and Indigenous participation and training in the second reference have been a factor in contributing to higher OM&A costs for WPLP relative to other transmitters in the sample group. If so, please provide the impact of these activities for WPLP and each of the utilities in the comparator group.

Response:

- a) From a benchmarking perspective, the annual costs of the business conditions cannot be estimated without conducting an econometric model and estimating the parameter values of each of the business conditions. This would require a substantial amount of work and time and was not within the scope of the current benchmarking study. Please refer to OEB Staff - 27 (e) for further information regarding the possible magnitudes and impacts of adjusting for business condition challenges.
- b) This requested information is not available from the benchmark study.

BOARD STAFF - 29

Reference: Exhibit F / Tab 3 / Schedule 1 / Appendix A / page 9

Preamble: The Application states that the Korn Ferry Hay job evaluation method is a form of factor comparison based on the notion that jobs can be measured on the basis of their relative contribution to the overall objectives of the organization. The Application notes that Korn Ferry uses the following four factors in the analysis: Know-How, Problem Solving, Accountability, and Working Conditions.

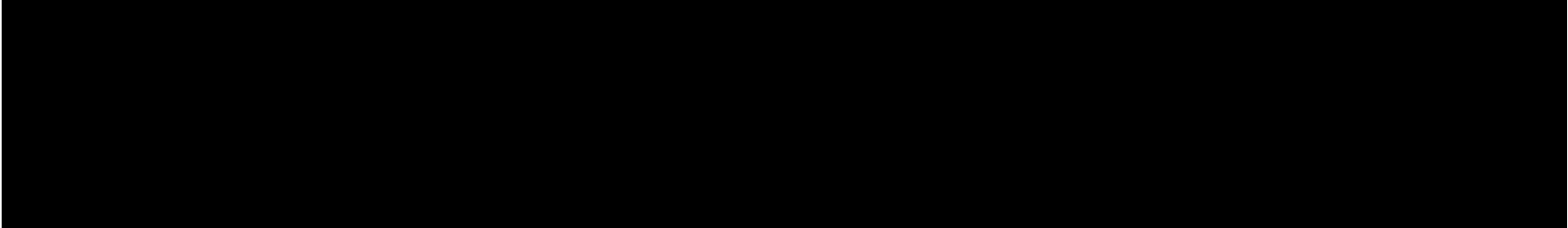
Question(s):

- a) Please describe how the four factors are applied in the Korn Ferry Hay method. Please provide an example.

Response:

- a) This response is being filed on a confidential basis. A request for confidential treatment is being filed concurrently with the filing of interrogatory responses.

[REDACTED]



BOARD STAFF - 30

Reference: Exhibit H / Tab 2 / Schedule 1 / page 2

Preamble: WPLP states it has recorded COVID construction costs of \$17,399,682 incurred during 2020 and \$42,096,982 incurred during 2021.

Question(s):

- a) Please provide additional details including a more detailed componentization of COVID-19-related costs.
- b) Please comment on the prudence of these costs and what steps WPLP had taken to mitigate them.

Response:

- a) Please see the additional detail on COVID-19 costs by the main EPC drivers provided in OEB Staff IR 31(a).
- b) The onset of the pandemic introduced wide-ranging impacts, both under WPLP's EPC Contract with Valard and in relation to non-EPC activities supporting the Project. All costs have been prudently incurred, reasonably mitigated and rigorously reviewed, as follows.

Impacts under the EPC Contract are governed by the terms of that contract, which appropriately allocates risk and provides rigorous procedures to be followed in circumstances such as the pandemic. In addition, WPLP has been and continues to be assisted by its Owner's Engineer in managing those processes. In the leave to construct proceeding for the Project, the OEB found the competitive tendering of the EPC contract and the retention of a third-party Owner's Engineer to assist with project management processes was a reasonable way to manage the risks associated with the Project and the costs thereof.¹

As described in Exhibit H-2-2, upon the pandemic being declared and in the months that have followed Valard and WPLP have taken a number of steps in the field and in accordance with the terms of the EPC Contract to appropriately manage and modify work plans to protect the health of workers and the communities impacted by the Project, as well as to mitigate impacts of COVID-19 on Project schedule and costs. This has included the development and implementation of a COVID Management Plan, as well as First Nation community-specific COVID Management Plans, which were developed by Valard with input from WPLP and the impacted communities. These measures enabled construction activities to continue subject to reasonable cost mitigation. In addition, WPLP holds weekly meetings

¹ OEB, Leave to Construct Decision and Order (Revised), EB-2018-0190, April 29, 2019, p. 12.

to discuss COVID-19 impacts as well as numerous commercial meetings to discuss COVID-19 schedule and cost impacts.

It is also important to recognize that, under the EPC Contract, in order for Valard to be compensated for claimed COVID-19 costs, they are required to submit invoices along with supporting information. WPLP and the Owner's Engineer thoroughly review all supporting information (invoices, timesheet, etc.) to ensure costs have been incurred in accordance with approved Change Orders and that all supporting information has been provided. WPLP works with Valard to ensure no costs are duplicated and that all costs are recorded and tracked appropriately. To the extent a cost is not supported or there is any concern regarding Valard's contractual entitlement to recover costs, no payment is made until WPLP's concerns are adequately addressed.

Regarding incremental costs incurred as a result of the pandemic outside of the EPC Contract, as described in Exhibit H-2-2, these generally relate to additional efforts that have been required by WPLP's Owner's Engineer, the Independent Engineer, as well as professional services providers in relation to reviewing and assessing EPC Contractor Change Requests. Given the purpose for these additional services, these amounts have been prudently incurred. Moreover, they represent an immaterial part of the overall incremental COVID-19 costs.

Further to the activities undertaken with Valard, WPLP worked with Nishnawbe Aski Nation to allow WPLP to work with First Nations regarding COVID-19. WPLP undertook significant engagement and communications with First Nations to allow the project to move forward while health and safety planning took place to address the heightened concern for health and safety in the communities due to COVID-19. In the early stages of COVID-19, WPLP held weekly meetings to provide project updates. As time progressed, the frequency of these COVID-19 meetings changed to bi-weekly, and then monthly.

For further discussion regarding the prudence of WPLP's COVID-19 related costs and its efforts to mitigate them, please see Exhibit H-2-2.

BOARD STAFF - 31

Reference: Exhibit H / Tab 2 / Schedule 2 / page 3
EB-2021-0134 Exhibit H / Tab 2 / Schedule 2 / page 13 / footnote 5

Preamble: Regarding the disposition of the COVID Construction Costs Deferral Account (CCCDA), WPLP stated that Valard identified three main categories of impacts affecting its ability to execute the project at the cost and in accordance with the schedule agreed to in the EPC contract: (a) compliance with COVID-19 health and safety measures and the corresponding impact on productivity; (b) flight and travel restrictions; and (c) construction activities, specifically work camps, substations and lines.

Question(s):

- a) Please provide the amount and details for 2020 and 2021 separately for each of the three main categories that Valard identified as impacting ability to execute the project at the cost and in accordance with the schedule agreed to in the EPC contract.
 - b) In the second reference above, in the 2022 rates proceeding, WPLP states that “at the present time, WPLP expects that incremental COVID-19 costs will generally be limited to costs incurred in 2020 and 2021.” Please confirm that this no longer is WPLP’s expectation, and if so, the reason for this.
 - c) Please confirm that WPLP does not anticipate any COVID-19-related costs in the CCCDA in 2023.
 - d) Given the enduring and long-term nature of the pandemic since it first affected WPLP’s operations in 2020, how does WPLP differentiate between COVID-19-related costs that are subject to recognition in the account versus those that should be considered part of an asset’s gross cost (similar to other unanticipated costs, such as inflationary pressures or other economic impacts)?
-

Response:

- a) The table below provides the amounts of COVID-19 costs by the main categories identified by Valard and is reconciled to the incremental COVID-19 costs for which WPLP is seeking approval to record in the CCCDA in the current rate application.

COVID-19 Cost Categories	2020	2021
Productivity and COVID-19 Health and Safety Measures	5,458	17,141
Flight and Travel Restrictions	-	7,200
Construction Activities	11,669	17,364
Non-EPC costs	273	227
	17,400	41,931
Carrying Charges	-	166
	17,400	42,097

- b) WPLP confirms this is no longer WPLP’s expectation. WPLP does expect COVID-19 costs will impact the project in 2022 and potentially future years. WPLP’s assumption in the EB-2021-0134 proceeding was based on the best information available. In 2022, to date, COVID-19 has had a significant impact on the project. Valard and its subcontractors have experienced 588 cases of COVID-19 since January 1, 2022. Moreover, WPLP and Valard continue to discuss Valard’s entitlement to COVID-19 schedule related costs, and in the event Valard is entitled to COVID-19 schedule related cost relief, WPLP will record those costs at that time.
- c) WPLP cannot confirm there will not be COVID-19-related costs in the CCCDA in 2023. COVID-19 is unpredictable and may require expenditures in future years. To the extent required by COVID-19, WPLP will ensure the appropriate steps are taken to protect the workers, the public, and the First Nations that are in close proximity to the Project Sites, as well as to ensure the First Nations expectations and COVID-19 protocols are adhered to. As a result, WPLP may need to incur costs in 2023 to ensure the safe execution of the project. Moreover, as noted in response to (b), above, WPLP and Valard continue to discuss Valard’s entitlement to COVID-19 schedule related costs, and in the event Valard is entitled to COVID-19 schedule related cost relief, WPLP will record those costs at that time.
- d) COVID-19 costs are subject to approval via the Change Order process under the EPC Contract. WPLP reviews all costs categorized as COVID-19 to ensure only COVID-19 costs are captured. As noted in response to OEB Staff IR 30 (b), WPLP has a well-defined process to evaluate COVID-19 Change Orders and ensure COVID-19 costs are differentiated from costs that should be considered part of an asset’s gross cost.

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Reference: Exhibit H / Tab 2 / Schedule 2 / pages 4-5

Preamble: WPLP states that the COVID-19 health and safety measures result in general reductions to worker productivity. WPLP and Valard have not been able to agree on a loss productivity factor for the period after March 31, 2021 and, as such, this aspect continues to be a subject of negotiation.

WPLP and Valard have secured a third-party consultant to determine the Base Rate of a flight so that they could accurately assess the impact of COVID-19 on flight and travel costs. WPLP expects the third-party to be engaged by the beginning of May 2022, and to be in a position to issue their report by August 2022.

Valard has sought schedule relief for delays as a result of COVID-19 as at December 31, 2021. Valard has not provided any cost estimate for the COVID-19 schedule delays. Any schedule or cost relief sought by Valard as it relates to impacts on construction will be pursuant to the EPC contract and subject to negotiations between WPLP and Valard.

Question(s):

- a) Please confirm if the loss productivity factor for the period after March 31, 2021 have been negotiated between Valard and WPLP and the impact on the total balance for the year 2021.
- b) Please advise of the results of the third-party report on the base rate of a flight and its impact, if any, on the COVID-19 costs with Valard. If available, please provide a copy of this report.
- c) Please advise whether WPLP and Valard have concluded that the impact of COVID-19 on the commercial air transportation industry and flight costs has subsided. If so, what effective date does that conclusion pertain to? Please explain in detail.
- d) Please confirm that the forecasted costs include an estimate of the potential cost relief that Valard is expecting for delays as a result of COVID-19 as at December 31, 2021. If not, what is the estimated cost relief that WPLP expects Valard to seek as at December 31, 2021.
- e) Please provide an estimate of any compensation Valard may seek in relation to COVID-19 as a result of impacts to schedule or incremental costs as a result of COVID-19 impacts in 2022. As well, please provide a forecast of any additional costs expected to be recorded in 2022 (year to date actuals if applicable and remaining 2022 forecast separately).
- f) WPLP indicated that Valard has not provided any cost estimate for the COVID-19 schedule delays. Please explain the basis and approach for WPLP to estimate the \$90.3 million forecasted incremental EPC contract project costs attributable to COVID-19.

Response:

- a) The loss productivity factor for the period after March 31, 2021 has not been finalized between Valard and WPLP.
- b) The report is currently in progress and the results have not been finalized. WPLP's best estimate of the impact on flight costs up to June 30, 2022, has been included in WPLP's forecast.
- c) WPLP and Valard have not concluded that the impact of COVID-19 on the commercial air transportation industry and flight costs has subsided.
- d) The forecasted costs do not include an estimate of the potential cost relief that Valard is expecting for delays as a result of COVID-19 as at December 31, 2021. Valard has not provided sufficient information to allow WPLP to provide an estimate of the cost relief.
- e) WPLP is not in a position to provide the requested estimate because to date it has not received a substantiated estimate from Valard on expected compensation related to COVID-19 impacts to schedule or incremental costs as a result of COVID-19 in 2022. In July 2022 Valard updated its COVID Management Plan to remove a number of COVID-19 specific health and safety procedures. As a result, WPLP anticipates the COVID-19 direct costs for 2022 to be reduced provided that COVID-19 impacts remain minimal. At this time, WPLP has not received updated costing. WPLP is therefore not in a position to estimate the costs for 2022 for the remainder of the year. The best estimate of COVID-19 costs for 2022 is \$15.3 million, which consists of the costs estimated to June 30, 2022 for productivity and COVID-19 health and safety measures.
- f) WPLP worked with Valard to estimate the \$90.3 million in COVID-19 costs. The estimate includes all non-schedule related COVID-19 costs. While Valard has not provided a substantiated estimate on COVID-19 schedule related costs, Valard did provide information on direct (Variable, testing, quarantine, and vaccination costs) COVID-19 costs, production activity to determine the productivity loss (using a 6% productivity loss factor) as well as an estimate on flight costs. The estimate included the actual costs incurred and invoiced under the COVID-19 Change Orders as well as a provision for non-schedule related cost up to June 30, 2022 that have yet not been invoiced.

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Reference: Exhibit H / Tab 2 / Schedule 2 / page 6

Preamble: WPLP is forecasting incremental EPC contract project costs attributable to COVID-19 of \$90.3 million and non-EPC incremental project costs attributable to COVID-19 of \$0.6 million.

Question(s):

- a) Please confirm if WPLP is requesting that the non-EPC incremental project costs attributable to COVID-19 be treated in the same manner as EPC costs. If it is not to be treated in the same manner, please clarify how it is to be treated.

Response:

- a) For third party (Owner Engineer, Legal, Independent Engineer and other Consulting) non-EPC incremental costs related to COVID-19, WPLP confirms that it is requesting these costs be treated in the same manner as EPC incremental costs related to COVID-19. In addition, WPLP confirms that it is requesting that any COVID-19 specific health and safety costs incurred by WPLP (i.e. masks) be treated in the same manner as EPC incremental COVID-19 costs. For all other COVID-19 incremental non-EPC costs WPLP is not requesting that the costs be treated in the same manner. WPLP records these costs as capital or operating costs. The tracking of other incremental non-EPC Costs would be cost prohibitive.

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Reference: Exhibit H / Tab 2 / Schedule 2 / page 10 / Table 2
Exhibit H / Tab 2 / Schedule 2 / page 11 / Table 3

Preamble: Table 2 provides the owner equity, ratepayer impact and impact on the independent Trust under the assumption there is no federal funding.

Table 3 provides the owner equity, ratepayer impact and impact on the independent Trust under the assumption there is federal funding.

Question(s):

- a) Please provide detailed calculations for the COVID-19 proceeds, and for each component of the Revenue Requirement Impact in Table 2 including incremental rate base, incremental return and collection of remaining deferral account plus carrying charges for each of the 3 options. Please include any assumptions about interest rates and time period.
 - b) Please provide detailed calculations for the COVID-19 proceeds, and for each component of the Revenue Requirement Impact in Table 3 including loss of Trust funds as a result of incremental contribution to WPLP, earnings on incremental Trust balance, incremental rate base, incremental return and collection of remaining deferral account plus carrying charges for each of the 3 options. Please include any assumptions about interest rates and time period including assumptions for the calculation of incremental Trust earnings.
 - c) Please confirm that Tables 2 and 3 are based on \$90.9 million COVID-Costs forecast as at the end of 2021. If this is not the case, please update Tables 2 and 3 based on \$90.9 million in COVID-Costs as at the end of 2021.
 - d) Please confirm that, in WPLP's view, holding all else equal (and ignoring factors such as incentives or access to credit), any amount of dollars from the Federal Funding Framework that is redirected away from the Contributions in Aid of Capital portion and towards the Trust portion represents a net benefit to ratepayers. If not, please explain.
 - e) Please discuss WPLP's analysis of net ratepayer benefits from its proposed treatment of COVID-19-related costs, when considering the asset lifetime costs attributable to ratepayers (including the impacts of cost of capital over the life of the underlying assets).
 - f) In the event that the OEB does not, in part or in full, accept WPLP's proposed treatment of COVID-19-related costs for the 2021 year, does WPLP have access to incremental credit facilities, should that financing become necessary?
-

Response:

a) The answer has been structured to detail each of the figures requested separately.

Calculation of COVID-19 Proceeds:

	COVID-19 Costs	COVID-19 Cost Recovery (4 year amortization)	COVID-19 Carrying Charge Recovery	Total
Capitalized				
COVID-19 Proceeds - 2022 Rate Application	\$17.40	\$10.15	\$0.09	\$10.24
Expensed/Expensed with Savings				
COVID-19 Proceeds - 2022 Rate Application	\$17.40	\$10.15	\$0.09	\$10.24
COVID-19 Proceeds - 2023 Rate Application	\$42.10	\$18.42	\$0.19	\$18.61
COVID-19 Proceeds - 2024 Rate Application	\$18.78	\$3.52	\$0.04	\$3.56
		\$32.09	\$0.32	\$32.41

Capitalized: Approved 2020 COVID-19 expenditures of \$17.4 million / 48 payments x expected 28 payments received during construction = \$10.15 million plus \$0.09 in carrying charges collected based on a prescribed interest rate of 0.57%.

Expensed/ Expensed with Savings: Approved 2020 COVID-19 expenditures of \$17.4 million / 48 payments x expected 28 payments received during construction = \$10.15 million plus \$0.09 in carrying charges collected based on a prescribed interest rate of 0.57%. In addition, would receive the 2021 COVID-19 Expenditures of \$42.1 million /48 payments x expected 21 payments during construction plus \$0.19 million in carrying charges collected based on a prescribed interest rate of 0.57%. Finally, we include the forecasted 2023 expenditures of \$18.8 million /48 payments x 9 expected payments plus \$0.04 in carrying charges based on a prescribed interest rate of 0.57%.

Incremental Rate Base Calculation: Calculated based on the change in rate base value between financing model prior to COVID-19 and rate base values under separate scenarios.

	Capitalized	Expensed	Expensed (\$20M Savings)
Rate Base before Capital Contribution (Table 3 of H-2-2)	\$1,957.79	\$1,884.85	\$1,864.82
Less Depreciation (Table 3 of H-2-2)	(\$45.05)	(\$44.29)	(\$44.71)
Less Pikangikum (Table 1 of H-2-2)	(\$62.82)	(\$62.82)	(\$62.82)
Rate Base before Capital Contribution	\$1,849.92	\$1,777.74	\$1,757.28
Less: Base Case Prior to COVID-19	(\$1,785.48)	(\$1,785.48)	(\$1,785.48)
Incremental Rate Base	\$64.44	(\$7.74)	(\$28.20)

Based on financial model pre-COVID-19.

Incremental Return Calculation: Simplified calculation of average rate base x model WACC (4.35%) x 40 years.

		Capitalized	Expensed	Expensed (\$20M Savings)
Incremental Rate Base (from above)	A	\$64.44	(\$7.74)	(\$28.20)
Average Rate Base	B=A/2	\$32.22	-\$3.87	-\$14.10
WACC (Table 1 in G-2-1)	C	4.35%	4.35%	4.35%
Estimated average Life	D	40 years	40 years	40 years
Incremental Return	E=BxCxD	\$56.06	-\$6.73	-\$24.53

Collection of Remaining Deferral Account plus carrying charge Calculation:

	Capitalized	Expensed	Expensed (\$20M Savings)
COVID-19 Approved in 2022 Rate Application	\$17.40	\$17.40	\$17.40
Future COVID-19 Costs	\$0.00	\$73.50	\$73.50
Total Costs to Recover from Deferral Account	\$17.40	\$90.90	\$90.90
COVID-19 Cost Proceeds from Construction Period (Table above)	\$10.15	\$32.09	\$32.09
Remaining COVID-19 Deferral Balance to be Collected	\$7.25	\$58.81	\$58.81
Remaining COVID-19 Carry Charges to be Collected (Carrying charges assumed at prescribed rate of 0.57%)	\$0.16	\$1.28	\$1.26
Collection of remaining deferral account plus carrying charges	\$7.41	\$60.09	\$60.07

- b) Similar to above, the answer has been structured to detail each of the figures requested separately.

COVID-19 Proceeds Calculation: COVID-19 proceed calculations are consistent with the detail provided in question (a) above.

Loss of Trust Fund Calculation:

	Capitalized	Expensed	Expensed (\$20M Savings)
Capital contribution (Table 3 of H-2-2)	\$912.74	\$758.69	\$688.23
Less Base model prior to COVID-19	(\$839.32)	(\$839.32)	(\$839.32)
Loss (Increase) of Trust funds as a result of increased contribution to WPLP	\$73.42	(\$80.63)	(\$151.09)

Based on financial model pre-COVID-19.

Earnings on incremental Trust balance Calculation:

	Capitalized	Expensed	Expensed (\$20M Savings)
Funds Remaining in Trust (Table 3 of H-2-2)	\$637.26	\$791.31	\$861.77
Less: Funds Remaining in Trust (Capitalized Balance)	(\$637.26)	(\$637.26)	(\$637.26)
Incremental Trust Balance between Models	\$0.00	\$154.05	\$224.51
Assumed Interest Rate 4% Compounded	4%	4%	4%
Compound Period in years	10 years	10 years	10 years
Earnings on Incremental Trust Balance (Fair Value of Inputs above)	\$0.00	\$73.98	\$107.82

Incremental Rate Base Calculation:

	Capitalized	Expensed	Expensed (\$20M Savings)
Rate base after CIAC (per Schedule 1.1 (d) = Owner Equity / 40%) (Table 3 in H-2-2)	\$1,000.00	\$1,081.87	\$1,131.87
Less Rate Base in Capitalized Scenario	(\$1,000.00)	(\$1,000.00)	(\$1,000.00)
Incremental Rate Base between Capitalized and Expenses Scenario	\$0.00	\$81.87	\$131.87

Incremental Return Calculation:

		Capitalized	Expensed	Expensed (\$20M Savings)
Incremental Rate Base (from above)	A	\$0.00	\$81.87	\$131.87
Average Rate Base	B=A/2	\$0.00	\$40.93	\$65.93
WACC (Table 1 in G-2-1)	C	4.35%	4.35%	4.35%
Estimated average Life	D	40 years	40 years	40 years
Incremental Return	E=BxCxD	\$0.00	\$71.23	\$114.73

Collection of Remaining Deferral Account plus carrying charges: Consistent with detail provide above in question (a).

- c) Confirmed.
- d) WPLP confirms, that, in WPLP’s view, holding all else equal (and ignoring factors such as incentives or access to credit), any amount of dollars from the Federal Funding Framework that is redirected away from the Contributions in Aid of Capital portion and towards the Trust portion represents a net benefit to ratepayers.
- e) WPLP’s analysis assumed a 40-year average asset life when determining the rate payer impact as a result of the proposed COVID-19 treatment. The analysis did not include any sustaining capital (after the construction period) as the impact on the ratepayer would be the same under all scenarios.
- f) Based on WPLP’s current forecast, WPLP would have access to incremental credit facilities, should that financing become necessary. However, available funding is limited to the approved credit facilities and given the Project is just over 50% complete, we are in a rising interest rate environment and there remains outstanding issues between Valard and WPLP (Fire, Access and COVID-19) retaining surplus funding to fund other costs would be prudent.

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Reference: Exhibit H / Tab 2 / Schedule 2 / page 12
Exhibit I / Tab 4 / Schedule 1 / pages 5-6

Preamble: The Federal Funding Framework establishes a sliding scale such that, as WPLP's costs increase, the CIAC amount increases at a rate that reduces WPLP's deemed equity position in the project. Based on the Federal Funding Framework, WPLP's equity cannot rise above \$400 million when costs are above \$1.87 billion. WPLP anticipates that the distribution of federal funds will occur in 2024.

WPLP states that to the extent that its equity contribution is limited to less than 40% in a future year, this will be addressed in its revenue requirement application for the relevant test year. WPLP expects that its application for a 2024 test year revenue requirement (filed in 2023) will incorporate the impact of federal funding on a forecast basis.

Question(s):

- a) Please confirm that if WPLP's equity contribution is forecast to be limited to less than 40% in any future proceeding by the Federal Funding Framework that it will, for the purposes of rate-setting, apply its actual capital structure and not the OEB-deemed capital structure of 40% equity. If this is not the case, please explain.
- b) Based on its current projection of total project costs, does WPLP anticipate filing for 2024 rates based on its actual debt-to-equity capital structure?
- c) Under what conditions or scenarios would WPLP seek rates in a future proceeding that deviate from the OEB's deemed 40% equity capital structure?

Response:

- a) Confirmed. WPLP would adjust its capital structure to actual for rate-setting purposes.
- b) WPLP anticipates filing its 2024 rate application with an adjusted capital structure to actual based on the Federal Funding Framework.
- c) Once the Federal Funding Framework has been implemented and WPLP receives the federal contribution in aid of construction, WPLP intends to follow the OEB deemed 40% equity capital structure.

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Reference: Exhibit I / Tab 4 / Schedule 1 / page 2 / Table 1
Exhibit I / Tab 4 / Schedule 1 / page 4 / Table 4

Preamble: Item B in Table 1 indicates a monthly increase related to Network RTSR in 2023 on residential bills of \$0.04 and item C in Table 1 indicates a monthly increase related to RRRP rate in 2023 on residential bills of \$0.15. The total monthly bill increase in Table 1 for residential customers is \$0.20 whereas items B and C total \$0.19.

Item E In Table 4 indicates a monthly bill increase due to RRRP adjusted for HST and OER in 2023 on general service bills of \$0.42 based on WPLP's calculations for items C and D.

Question(s):

- a) Please provide detailed calculations for items B, C, D and E In Table 4 for residential customers. Please adjust the bill increase in Table 1 for residential customers, if required.
- b) Please confirm if the uplift calculation of 2,192 kWh in Table 4 for general service customers is correct. Please provide detailed calculations for items B, C, D and E in Table 4 for general service bills including revised uplift consumption if necessary. Please adjust the bill increase in Table 1 for general service customers, if required.

Response:

- a) Item B: The detailed calculation of the \$0.0002/kWh increase in the RRRP rate is provided in Table 3 of I-4-1

Item C: $750 \text{ kWh (typical residential consumption)} * 1.076 \text{ (HONI R1 loss factor)} = 807 \text{ kWh (loss-adjusted kWh)}$

Item D: $\$0.0002/\text{kWh (RRRP increase from Item B)} * 807 \text{ kWh (loss-adjusted kWh from Item C)} = \0.1614

Item E: $\$0.1614 \text{ (RRRP impact, pre-HST and OER)} * [1 + 0.13 \text{ (add HST)} - 0.17 \text{ (remove OER)}] = \0.1549

Table 1 in I-4-1 listed charges at 2 decimal places. The charges at 4 decimal places are shown in the table below, which accounts for the difference between \$0.19 (the sum of the two amounts individually rounded to two decimal places) vs. \$0.20 (amounts added without rounding and displayed at two decimal places).

Item	Description	Amount	
		Residential	General Service
A	Typical monthly bill	\$134.6900	\$424.6700
B	Increase related to Network RTSR	\$0.0418	\$0.0894
C	Increase related to RRRP rate	\$0.1549	\$0.4209
D = B + C	Total bill increase	\$0.1968	\$0.5102
E = D / A	Bill impact (%)	0.15%	0.12%

b) The uplift calculation is $2,000 \text{ kWh} * 1.096 \text{ (HONI GSe loss factor)} = 2,192 \text{ kWh}$

Item B: The detailed calculation of the \$0.0002/kWh increase in the RRRP rate is provided in Table 3 of I-4-1

Item C: $2000 \text{ kWh (typical residential consumption)} * 1.096 \text{ (HONI GSe loss factor)} = 2192 \text{ kWh (loss-adjusted kWh)}$

Item D: $\$0.0002/\text{kWh (RRRP increase from Item B)} * 2192 \text{ kWh (loss-adjusted kWh from Item C)} = \0.4384

Item E: $\$0.4384 \text{ (RRRP impact, pre-HST and OER)} * [1 + 0.13 \text{ (add HST)} - 0.17 \text{ (remove OER)}] = \0.4209

The calculations of the General Service bill impacts to 4 decimal places are provided in the table in response to part (a) above.