

1 Q. **Reference: Schedule 1, Attachment 13.**

2 a) Has Hydro completed a Project Execution Strategy for the Penstock 3 or is Hydro proposing
3 to use the Project Execution Strategy provided for Penstock 1?

4 b) If Hydro plans to use the Project Execution Strategy prepared for Penstock 1, provide the
5 rationale for using the same execution strategy.

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8 A. **a & b)** When completing the initial FEED¹ work, the internal project team did not develop a
9 Project Execution Strategy specifically for Penstock 3. Given the similarity in scope,
10 design parameters, execution methodology, and risks to Penstock 1, the information
11 contained in the Penstock 1 Execution Strategy, along with the information gained
12 through the execution of the Penstock 1 Weld Refurbishment and Section Replacement
13 Project and resulting lessons learned, was sufficient to develop a project budget
14 commensurate with the requirements of a Class 3 estimate, as per AACE.²

15 The major components of the execution strategy—including offsite fabrication, marine
16 transport to site, simultaneous work fronts for replacement and refurbishment, use of
17 robotic technology for welding, and surface preparation and coatings—remain
18 unchanged. A project execution plan specific to Penstock 3, which will account for any
19 difference in penstock location and access, will be a deliverable provided by the EPCM³
20 Contractor during the detailed design/execution phase of the work for Penstock 3.

¹ Front-End Engineering and Design (“FEED”).

² Association for the Advancement of Cost Engineering (“AACE”).

³ Engineering, Procurement, and Construction Management (“EPCM”).