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DIRECT TESTIMONY OF CHARLES E. BOLYARD, JR.

OF McDONOUGH BOLYARD PECK, INC.

FOR WILLIAMS SOLAR, LLC

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

Docket No. E-2, Sub 1220

April 28, 2020

I. INTRODUCTION AND SUMMARY

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Charles E. Bolyard, Jr. My business address is Williams Plaza 1, 3040 Williams Drive, Suite 300, Fairfax, VA 22031.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by McDonough Bolyard Peck, Inc., which is headquartered in Fairfax but has offices in nine states, including North Carolina. I currently serve as Chairman of the Board of Directors, having been continuously employed with this firm for more than 30 years. The firm specializes in construction management and consulting services.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I am a 1974 graduate of West Virginia Institute of Technology (now West Virginia University Institute of Technology) with a Bachelor of Science Degree in Civil Engineering. I attended Catholic University of America, taking graduate level course study in Estimating, Bidding and Cost Control. I have continued my

1 education through participation in seminars and training provided through
2 professional associations and private entities.

3 Over my career, I have attained and maintain the following professional
4 certifications and affiliations:

- 5 o Certified Construction Manager (CCM) – through the Construction
6 Management Association of America (CMAA).
- 7 o Planning and Scheduling Professional (PSP) – through AACE
8 International (AACE).
- 9 o Certified Forensic Claims Consultant (CFCC) – through AACE
10 International (AACE).
- 11 o Member and Fellow of CMAA.
- 12 o Member and Fellow of AACE International, a Past-President, and
13 currently serve as Chairman of AACE’s Certification Associate Board.
- 14 o I have previously served as a Regional Director, Vice President of
15 Certification and as Chairman of the CFCC Committee of the
16 Certification Associate Board.
- 17 o I am a Life Member of the American Society of Civil Engineers
18 (ASCE).
- 19 o I am a member of the Dispute Review Board Foundation (DRBF).

20 A CV providing a complete summary of my professional experience is attached as
21 Exhibit CEB-1.

22 **Q. PLEASE SUMMARIZE YOUR EXPERIENCE IN THE FIELD OF**
23 **CONSTRUCTION COST ESTIMATION.**

24 A. I have more than 46 years of experience in the construction industry in varying
25 capacities and with increasing responsibility over construction managers,
26 contractors, owners, and construction consultants. My cost estimating experience
27 includes direct responsibility for design and construction cost estimates as large as

1 \$3.3 billion. My Critical Path Method (CPM) scheduling experience includes
2 preparation, maintaining, and updating CPM schedules for projects of varying sizes
3 and complexities in both design/bid/build and design/build project delivery
4 approaches. As components of my work in claims analysis and dispute resolution,
5 I have reviewed and investigated schedule performance, schedule impact and delay
6 analyses, labor loss of productivity analyses, cost estimates, actual costs of
7 performance and claimed damages of contractors, architects/engineers, owners and
8 consultants for projects as large as \$10 billion.

9 I have developed and presented instructional training on topics including
10 project records management, cost estimating, bidding, cost management, CPM
11 scheduling, delay analysis, and impacts and damages analysis, and co-authored an
12 article entitled Earned Value Analysis and CPM Schedule Review in Construction,
13 published in AACE International's periodical Cost Engineer.

14 **Q. PLEASE SUMMARIZE YOUR EXPERIENCE WITH OF UTILITY**
15 **CONSTRUCTION PROJECTS.**

16 A. I have more than 40 years' experience in evaluating cost estimating methodologies
17 and process for power generating facilities and the interconnection of those
18 facilities to the distribution grid. I also have the experience on these same power
19 generation projects of evaluating the following: (a) the actual costs of performance
20 in comparison to original cost estimates; (b) updated cost estimates and re-
21 estimates; (c) forecasts of costs at completion of projects; and (d) impacts to
22 estimated costs arising from changes in project scope and impacts from delays and
23 disruptions to the progress of construction. The types of power generating facilities

1 include coal-fired, natural gas and alternate fuel fired, integrated coal gasification,
2 hydroelectric and nuclear facilities within and outside the United States.

3 **Q. HAVE YOU PROVIDED TESTIMONY IN PRIOR STATE REGULATORY**
4 **COMMISSION PROCEEDINGS?**

5 A. No.

6 **Q. HAVE YOU PROVIDED TESTIMONY IN PRIOR COURT OR**
7 **ADMINISTRATIVE PROCEEDINGS?**

8 A. Yes. I have provided expert testimony in numerous construction disputes, and I
9 have also served as mediator and third-party neutral in the resolution of claims and
10 disputes arising from design and construction projects. My experience in expert
11 testimony has been in the areas of cost estimating, cost management, actual costs
12 of construction, construction means and methods, trade coordination, CPM
13 scheduling and delay analysis, impacts analysis and damages analysis, construction
14 management, and cost estimating and management standard of care.

15 I have been qualified and provided expert testimony in venues such as the
16 United States Court of Federal Claims, federal district courts, the Civilian Board of
17 Contract Appeals, the International Institute for Conflict Prevention & Resolution
18 arbitration proceedings, various state and county courts, AAA Arbitrations, and
19 federal agencies' Board of Contract Appeals. A summary of my prior testimony is
20 included as part of Exhibit CEB-1.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 A. I have been engaged on behalf of Williams Solar, LLC ("Williams Solar") to
23 independently review and evaluate the reasonableness of, and basis for, the cost

1 estimates provided by Duke Energy Progress (“DEP”) for network upgrades and
2 interconnection facilities necessary to interconnect Williams Solar to DEP’s
3 electric power distribution system.

4 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

5 A. First, I discuss the process by which DEP arrived at its initial cost estimate for the
6 Williams Solar interconnection project provided by DEP at the System Impact
7 Study Report stage (which I refer to as the “Initial Estimate”).

8 Second, I discuss the process by which DEP arrived at its revised cost
9 estimate for the Williams Solar interconnection project provided by DEP at the
10 Facilities Study Report stage (which I refer to as the “Revised Estimate”). In this
11 section, I discuss the key differences between DEP’s Initial and Revised Estimates.

12 Third, I present my opinions regarding both DEP’s Initial Estimate and
13 Revised Estimate and identify the underlying documents that informed my
14 opinions.

15 Finally, I discuss DEP’s claim that in 2019 it investigated and resolved
16 problems with its processes and procedures for estimating the costs of construction
17 for interconnection projects.

18 **Q. PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY.**

19 A. In January 2019, DEP provided Williams Solar with its Initial Estimate, which
20 indicated expected Upgrade costs in the amount of \$774,000 and Interconnection
21 Facilities costs of \$60,000. Six months later, in July 2019, DEP provided its
22 Revised Estimate indicating expected Upgrade costs in the amount of
23 \$1,388,374.26 and Interconnection Facilities cost of \$196,495.13.

1 DEP prepared its Initial Estimate using a spreadsheet-type template—
2 referred to as the SIS Estimation Tool Rev0—that purportedly relied on compatible
3 unit cost data based on historical work order cost information from DEP’s project
4 management database. In contrast, DEP prepared its Revised Estimate by applying
5 an arbitrary set of “plus up” calculations to the estimated costs calculated by DEP’s
6 Maximo software platform.

7 Based on my experience with appropriate methods of cost estimation in the
8 construction industry and my review of the documents provided by DEP in
9 discovery, my conclusion is that neither estimate was properly designed to yield
10 fair, reasonable and reliable results.

11 First, the Initial Estimate was based on cost inputs that DEP knew, or should
12 have known, were outdated and yielded results that were inconsistent with
13 construction costs DEP claimed it was experiencing on interconnection projects.

14 Second, the Revised Estimate forecast significantly increased costs, not
15 based on any new information or changes in the scope of the project but based on
16 an arbitrary set of calculations applied by DEP for the sole purpose of generating a
17 higher cost estimate. In fact, the Revised Estimate simply takes the output of DEP’s
18 estimating software and grosses it up by certain multipliers.

19 Third, as regards DEP’s application of 20% contingency in its cost estimate,
20 based on DEP’s purported level of engineering design and site investigation
21 performed prior to developing its Revised Estimate, I find 20% to be an excessive
22 amount of contingency and would expect the contingency applied in the Revised
23 Estimate to be significantly less than the 20% used by DEP.

1 Finally, while DEP claims it has made efforts toward improving its cost
2 estimating processes, by all appearances, these “improvements” are not consistent
3 with industry practice.

4 **Q. ARE YOU OFFERING AN OPINION AS TO THE REASONABLENESS OF**
5 **THE ACTUAL COSTS OF THE WILLIAMS SOLAR PROJECT CLAIMED**
6 **BY DEP?**

7 A. No. I want to be clear that my testimony only relates to the reasonableness of, and
8 basis for, the cost estimates provided by DEP to Williams Solar. I have not
9 independently formed an opinion regarding what the “right” number should be
10 except to say that DEP did not utilize a process designed to generate the “right”
11 estimated cost. Additionally, for purposes of this testimony, I have assumed the
12 reported dollar amount of, and have not independently evaluated, information
13 provided in discovery by DEP relating to actual construction costs it incurred in
14 connection with other interconnection projects. Whether these actual costs were
15 reasonably and appropriately incurred is not the subject of my testimony.

16 **Q. CAN YOU SUMMARIZE THE BASIS FOR YOUR OPINIONS?**

17 A. My opinions expressed herein are based on my education, experience, and review
18 of project records and materials exchanged by the parties. My opinions do not and
19 should not be construed as providing legal conclusions.

20 My opinions presented generally identify examples of the project records
21 and other documents on which I relied in reaching my conclusions and opinions. I
22 also reviewed many documents, in addition to those on which I have explicitly
23 relied. *See* Exhibit CEB-2 (listing of documents reviewed).

- 1 • Removing one 25A fuse;
- 2 • Installing three 50A fuses;
- 3 • Installing seven 25A fuses; and
- 4 • Installing seventy-one high fault tamer fuses.¹

5
6 The System Upgrade costs were broken down as follows:

Transmission Upgrades	\$0
Substation Upgrades	\$0
New Line Construction/Reconductoring	\$705,000
Protection Upgrades/Sectionalization	\$69,000
Other	\$0

7
8 *See* Exhibit CEB-4 (System Impact Study Report, at Table 4 p. 17). This summary
9 indicates that the great majority of the estimated costs relate to the reconductoring
10 work as opposed to the fuse swap-outs, which would be consistent with my
11 expectations.

12 The Interconnection Facilities costs were not broken down, but the facilities
13 required were specified in the January 28, 2019, e-mail to Williams Solar. *See*
14 Exhibit CEB-3.

15 **Q. WHAT PROCESS DID DEP USE IN PROVIDING ITS INITIAL**
16 **ESTIMATE TO WILLIAMS SOLAR?**

17 A. Based on my review of information provided by DEP, it appears that DEP
18 employed one or more spreadsheet-type templates—referred to as the SIS
19 Estimation Tool Rev0—that rely on compatible unit cost data based on historical

¹ *See* System Impact Study Report, at 16, attached as Exhibit CEB-4 (referenced page numbers refer to the page numbers of the PDF file). *See also* Internal DEP e-mail dated December 19, 2018, transmitting the System Impact Study for Williams Solar, LLC, attached as Exhibit CEB-5 (identifying cost estimate for DEP’s system upgrades, including Estimated Construction Hours of 5,157 hours).

1 work order cost information from DEP's project management database to develop
2 the Initial Estimate.

3 DEP describes its procedure as follows:

4 First, the System Impact Study estimated cost [*sic*] are based on
5 reviewing the upgrades identified in the System Impact Study
6 Report with the existing conditions and any current proposed non-
7 DER upgrades in the DEP Graphical Information System (GIS) and
8 a per mile cost estimation sheet. The SIS Estimation Tool Rev0
9 (which is being produced in DEP's response to Request for
10 Production of Documents No. 5), has typical system upgrade project
11 cost estimates on a per mile basis. These estimated cost data inputs
12 to the cost estimate sheet were developed by the Capacity Planning
13 Department based on overhead distribution line construction
14 completed in DEP on a per mile cost basis. This cost estimation
15 sheet is utilized to estimate costs for both internal overhead
16 distribution line construction projects, as well as System Impact
17 Study estimates for generator interconnections. The Capacity
18 Planning Department also more recently developed the SIS
19 Estimation Tool Rev0 based on completed projects. The cost data
20 relied upon by DEP in generating cost estimates in the cost estimate
21 tool is based upon the following categories of procured costs:

- 22 a. Overhead Contractors (Labor/Equipment) – The
23 contractors completing those projects were selected
24 on a competitive basis and were required to satisfy
25 DEP's qualifications including safety, construction
26 quality, presence in our region, ability to scale, cost
27 and other factors.
- 28 b. Material/Parts – Duke obtains competitive pricing
29 for material purchases and performs a technical and
30 commercial evaluation to determine the best overall
31 evaluated pricing to select an approved supplier or in
32 many cases multiple suppliers. Duke periodically
33 reviews market conditions to assess indices relative
34 to raw material cost and perform cost modeling for
35 approved price adjustments.
- 36 c. Engineering Labor - Pike Engineering is an
37 engineering contractor for both Duke Energy
38 Progress and Duke Energy Carolinas. Their rates for
39 engineering labor were competitively bid.

1 Respondent Duke Energy Progress, LLC's Responses to Complainant's First Set
2 of Interrogatories and Requests for Production of Documents, at Interrogatory No.
3 1-3 (attached as Exhibit CEB-6).

4 In its Supplemental Responses, DEP made clear that the revised SIS
5 Estimation Tool was not utilized in preparation of the Williams Solar Initial
6 Estimate:

7 Finally, DEP clarifies its response to Request No. 1-3 to confirm
8 that the Capacity Planning Department developed "SIS Estimation
9 Tool Rev0" and provided it to Pike Engineering in 2015. This tool
10 was created using completed distribution work orders completed
11 prior to 2015. In June 2019, the Duke Energy Distributed Generation
12 Team updated the spreadsheet to "SIS Estimation Tool Rev1." This
13 update was implemented to more accurately estimate system
14 upgrade costs.

15 Duke Energy Progress, LLC, Supplemental Responses to Complainant's First Set
16 of Interrogatories and Requests for Production of Document, at Interrogatory No.
17 1-3 (attached as Exhibit CEB-7). This clarification by DEP indicates that the
18 historic cost data utilized by DEP in preparing the Initial Estimate was, at a
19 minimum, four years old at the time the Initial Estimate for Williams Solar was
20 prepared in December 2018.

21 This is further confirmed by DEP's Response to Interrogatory No. 1-6, in
22 which DEP provided its response with respect to line item type historic cost data
23 for similar projects, if any, used by DEP in developing estimated costs for
24 Preliminary Estimated Upgrade Charge. DEP's response was as follows:

25 The creation of the "SIS Estimation Tool Rev0" tool originated in
26 work order designs created in the late 1990's or early 2000's for
27 general distribution work. Sometime between 2000 and 2005, the
28 work orders were converted to the Work Management Information

1 System (WMIS) and the format of the “SIS Estimation Tool Rev0”
2 tool was developed. Work orders were created in WMIS on various
3 types of construction needed to complete System Improvement
4 projects. The work orders were based upon generic work orders
5 historically and were initially refreshed annually through a labor
6 intensive manual process. Each year, if a new type of System
7 Upgrade was needed, a new work order would be created to cover
8 the need. These work orders correspond to “historic cost data for
9 similar projects” referenced in DEP’s Answer.

10 In recent years, an adjustment factor was added to the SIS
11 Estimation Tool Rev0 to increase labor costs based experienced
12 changes in labor expense. As more time passed between the latest
13 revision of the estimates used to feed the tool and the application of
14 the tool, a decision was made to increase the base labor factor to
15 keep up with rising labor charges.

16 *See Exhibit CEB-6, at No. 1-6. In its Supplemental Response to this interrogatory,*
17 *DEP further confirmed that its Initial Estimate was reliant on stale input data:*

18 . . . DEP clarifies its initial Response to confirm that adjustment
19 factors were added prior to 2015 and in June 2019. From the time
20 Pike Engineering received the SIS Estimation Tool Rev0 in 2015
21 through June 2019, no changes were made in the form of adjustment
22 factors, or line item costs. Cosmetic changes were made for the
23 purposes of ease of use as explained in DEP’s supplemental
24 response to Request No. 1-1; however, line item costs and
25 adjustment factors remained the same.

26 DEP’s clarification confirms that the cost data relied upon by DEP in the
27 preparation of the Initial Estimate in December 2018 had not been changed since
28 prior to 2015, a minimum of four years.

29 **Q. WHAT IS YOUR UNDERSTANDING OF THE PURPOSE OF DEP’S**
30 **INITIAL ESTIMATE?**

31 A. DEP’s Initial Estimate was supposed to identify and detail impacts to DEP’s
32 electric distribution system associated with interconnecting the proposed Williams
33 Solar generating facility, and to identify System Upgrades and Interconnection

1 Facilities needed to interconnect and correct any system problems identified in the
2 study. As required by Sections 4.3.5 and 4.3.6 of the Commission's
3 Interconnection Procedures, these estimates are intended to provide a preliminary
4 non-binding estimate of the cost and length of time necessary to provide the
5 Interconnection Facilities and System Upgrades.

6 **Q. IN YOUR EXPERIENCE, WHEN A PROPERTY OWNER OR**
7 **DEVELOPER IS CONSIDERING A PROJECT, WHAT IS THE PURPOSE**
8 **OF AN EARLY CONSTRUCTION ESTIMATE OR CONSTRUCTION**
9 **BUDGET?**

10 A. The purpose of an early project estimate is to provide the project developer a
11 reliable and reasonable basis for evaluating the viability of the project and making
12 an informed investment decision as to whether to move forward to the next step in
13 project development. Stated another way, it would serve no purpose—and would
14 be actively harmful to the project developer—to provide an early estimate that was
15 completely without basis and that the estimator knew was unreasonable and
16 unreliable. Confirming the importance of the preliminary estimate to the
17 interconnection process, the Commission's Interconnection Procedures require
18 interconnection customers to provide payment or financial security equal to the cost
19 of the Network Upgrades identified in the preliminary estimate as non-refundable
20 prepayment in order to proceed to the Facilities Study phase. *See* Interconnection
21 Procedures, sec. 4.3.9.

22 **Q. DID YOU FIND EVIDENCE THAT DEP INTENDED THAT WILLIAMS**
23 **SOLAR WOULD RELY ON ITS INITIAL ESTIMATE IN MAKING**

1 **DECISIONS AS TO WHETHER TO MOVE FORWARD WITH THE**
2 **PROJECT?**

3 A. Yes. In its January 28, 2019, e-mail transmitting the Initial Estimate DEP stated:
4 “[T]he purpose of this email is for a decision to be made whether or
5 not to continue moving forward with the project for the final costs
6 or to withdraw. ... At this current stage your options are: Continue
7 with the interconnection process by completing and returning the
8 attached documents to be received within sixty (60) calendar days
9 form the date of this email – March 29, 2019; or you can Withdraw
10 by replying to this email.”

11 Exhibit CEB-3. It could not be clearer that DEP intended that Williams Solar rely
12 on the Initial Estimate in making decisions about whether to continue making
13 investments on the project.

14 **Q. IN CREATING ITS INITIAL ESTIMATE, DID DEP INCLUDE ANY**
15 **OVERHEAD EXPENSES IN THE ESTIMATE?**

16 A. The Initial Estimate, as transmitted to Williams Solar in the explanatory e-mail and
17 accompanying System Impact Study Report (*see* Exhibit CEB-3), did not include a
18 line item or cost category identifying DEP’s overhead expenses.

19 However, DEP’s discovery responses indicate that overhead was included in
20 the Initial Estimate. In response to Interrogatory 1-1, DEP states that “labor,
21 materials, and overhead are included in the \$774,000 estimate based on work
22 management data available as of the issuance date of System Impact Study report
23 for Williams Solar.” *See* Exhibit CEB-4.

24 **Q. IN CREATING ITS INITIAL ESTIMATE, DID DEP APPLY ANY**
25 **CONTINGENCY FACTOR IN THE ESTIMATE?**

1 A. No. There is no indication from the documents provided in discovery that DEP
2 included a contingency factor or contingency costs in its Initial Estimate.

3 **Q. DID DEP ATTEMPT TO IMPROVE ITS ESTIMATION PROCESS FOR**
4 **SYSTEM IMPACT STUDIES?**

5 A. It depends what you mean by “improve.” DEP’s discovery responses explain that
6 in June 2019, DEP introduced a new estimating tool for use in the system impact
7 study process. However, this “new” tool is apparently identical to the old tool used
8 to generate the Initial Estimate for Williams Solar, except in one respect: the
9 spreadsheet’s output, as summed in cell J13, is multiplied by a factor of two.
10 Compare Exhibit CEB-8 (“Williams Solar Estimation Tool SIS.xlsx”) with Exhibit
11 CEB-9, (“SIS Estimation Tool Rev1.xlsm”) (multiplying the “Total Cost Estimate”
12 by 2); *see also* DEP’s Responses to Williams Solar’s Interrogatory No. 1-7 “Also
13 in June 2019, . . . DEP determined that the SIS Estimation Tool Rev 1 needed to
14 have an additional contingency factor of 2.0 added . . .”). In my opinion, simply
15 multiplying the gross output of an estimate based on outdated source data by 2.0 is
16 not consistent with industry practice.

17 Moreover, DEP’s referring to this factor of 2 to increase estimated cost as a
18 “contingency” is not consistent with the way that term is used in construction
19 estimating. The “contingency” represented by DEP’s use of a factor of 2 represents
20 adding a 100% contingency. However, this factor is not truly a contingency. A
21 contingency applies when there is uncertainty about exactly what work will be
22 required to complete a project. The factor of 2.0 does not reflect a lack of
23 information about the required scope of work. It is really more what could be called

1 a “fudge factor” designed to account for an apparent recognition that the underlying
2 estimate is simply unreasonable and unreliable.

3 **III. DEP’S REVISED COST ESTIMATE**

4 **Q. PLEASE SUMMARIZE THE REVISED ESTIMATE PROVIDED TO**
5 **WILLIAMS SOLAR?**

6 A. DEP provided its Revised Estimate to Williams Solar on July 30, 2019. *See* e-mail
7 from Lee P. Winter to Williams Solar dated July 30, 2019 (attached as Exhibit
8 CEB-10). This Revised Estimate substantially increased forecasted costs,
9 projecting \$1,388,374.26 for Network Upgrades costs—comprised of
10 \$1,297,546.03 in upgrade costs and \$90,828.22 in state sales tax—and \$196,495.13
11 in Interconnection Facilities costs. In the Revised Estimate, DEP stated that
12 Williams Solar would be required to begin paying for the estimated Interconnection
13 Facilities costs immediately upon execution of the Interconnection Agreement.

14 **Q. DID DEP PROVIDE ANY FURTHER BREAKDOWN OR EXPLANATION**
15 **OF THESE COSTS?**

16 A. By e-mail on July 30, 2019, Williams Solar requested additional information about
17 the revised estimate, including “a detailed cost break down of every item in the
18 [scope of work] so that we can understand what exactly is driving this substantial
19 increase in costs. Exhibit CEB-11. DEP responded that it “cannot provide this
20 level of detail.” DEP did state that \$1,181,873.33 of the costs was attributable to
21 new line construction/reconductoring, and \$115,672.21 was attributable to
22 protection upgrades/sectionalization.

1 **Q. IN DISCOVERY IN THIS CASE, DID DEP PROVIDE ANY FURTHER**
 2 **BREAKDOWN OF THESE COSTS?**

3 A. Yes. DEP disclosed that the costs include the following general categories:

- 4 • Labor;
 5 • Labor Overheads;
 6 • Vehicle and Equipment Costs;
 7 • Vehicle and Equipment Overheads;
 8 • Material Costs;
 9 • Material Overheads;
 10 • Contingency

11 *See Exhibit CEB-6, at Interrogatory No. 1-2. More specifically, DEP disclosed*
 12 *that the estimates for each of these cost components was as follows:*

Estimated Labor Costs Total (LC)	\$	725,040.00
Estimated Vehicle / Equipment Total (VC)	\$	290,016.00
Estimated Total Material Costs (EMC)	\$	289,490.03
Estimate	\$	1,297,546.03

Total Labor Costs (LC) for Project		
LC	\$3,180 x 1 crew x 4 people per crew times 38 weeks	= \$483,360
Contingency	\$483,360 x 0.30	= \$ 96,672
Overheads	\$580,032 x .025	= \$145,000
Total Labor Costs (LC)		= \$725,040
Vehicle Cost (VC)		
Cost per Man Week	=(\$30 x 5 x 8) x 1.06	= \$ 1,272
VC	\$ 1,272 x 1 crew x 4 people per 38 weeks	= \$ 193,344
Contingency	\$193,344 x .020	= \$ 36,689
Overheads	\$232,013 x .025	= \$ 58,003
Total VC (with Inflation and Overheads)		= \$290,016
Estimated Material Costs		
	\$143,328 x 1.06 inflation assumption for 2 years	= \$151,927
	Material Overheads \$151,927 x .04875	= \$ 74,065
	Sub Total \$151,927 + \$74,065	= \$ 225,992
Contingency	\$225,992 x 0.20	= \$ 45,198
Overheads	\$45,198 x .025	= \$ 11,300
Total EMC (with Inflation and Overheads)		= \$282,490

14 *See Exhibit CEB-6, at Interrogatory No. 1-2.*

1 **Q. WHAT WAS THE DOLLAR AMOUNT OF INCREASE IN THE REVISED**
2 **ESTIMATE OVER DEP’S INITIAL ESTIMATE?**

3 A. DEP’s Revised Estimate for System Upgrade costs was \$614,374.26 (or 79.4%)
4 more than the Initial Estimate. As discussed above, this is well outside the norm
5 for industry accepted deviation from an initial project cost estimate. On its face,
6 this unexplained, substantial deviation from the initial estimate raises significant
7 questions.

8 **Q. WERE THERE ANY MATERIAL DIFFERENCES IN THE SCOPE OF**
9 **WORK FROM THE INITIAL ESTIMATE THAT MIGHT EXPLAIN THIS**
10 **DIFFERENCE?**

11 A. No. DEP did not identify any differences in scope of work from the Initial Estimate
12 and confirmed by e-mail on July 31, 2019, that “[t]he scope of work has not
13 changed.” Exhibit CEB-11. Typically, one would expect that revisions in cost
14 estimates would be driven by changes in the project design and scope, as it is quite
15 common for projects to evolve over time or to be more or less complicated than
16 originally envisioned. Where the scope does not change, one would expect that the
17 revised estimate would be very similar to the original estimate.

18 **Q. WHAT PROCESS DID DEP USE IN GENERATING ITS REVISED COST**
19 **ESTIMATE FOR THE WILLIAMS SOLAR PROJECT?**

20 A. DEP initially developed estimated costs through its Maximo software platform.
21 Then, DEP applied what it refers to as its “Revised Estimating Tool (RET)” to the
22 costs derived from Maximo in order to arrive at the costs presented in its Revised
23 Estimate. Exhibit CEB-6, at Interrogatory No. 1-3.

1 **Q. DO WE KNOW HOW MUCH OF THE REVISED ESTIMATE CAME**
2 **FROM MAXIMO AND HOW MUCH CAME FROM THE RET?**

3 A. Yes. Of the \$1,297,546.03 in system upgrade costs, \$679,419.31 was estimated by
4 Maximo and \$618,126.72 resulted from the RET. Exhibit CEB-12 at p. 7. That is,
5 DEP's Maximo software produced an estimate for system upgrades that was
6 approximately \$95,000 less than the Initial Estimate. The cost increase seen in the
7 Revised Estimate is entirely a result of application of the RET, increasing the costs
8 derived from Maximo by 91%, or nearly double.

9 **Q. ARE YOU FAMILIAR WITH THE MAXIMO SOFTWARE?**

10 A. Yes. I have a general familiarity with Maximo based on its use by one of MBP's
11 public agency clients in North Carolina. In addition, I consulted with colleagues
12 within MBP who have more detailed familiarity with the application of Maximo.
13 Maximo, an IBM product, is an "intelligent asset maintenance and operations
14 platform" that permits users to uniquely identify each asset (device, equipment,
15 cable, etc.) in the user's functional system. The unique asset identifier can then be
16 linked with product cost, technical and operational data for use in operating,
17 maintaining/servicing, updating, expanding and planning for replacement of
18 individual assets or groups of assets. This software platform can be used to initiate
19 work orders for maintenance, repair, or replacement of existing assets, as well as
20 for acquiring and installing new assets. The software platform has the functionality
21 to provide cost estimates based on cost data loaded into and stored or accessed
22 through links with data outside the system. As a software platform aimed at
23 enterprise asset management, Maximo has limited estimating capabilities that are

1 focused on asset repair and replacement, projecting replacement costs based on the
2 initial costs of the asset as entered in Maximo.

3 **Q. YOU STATED THAT THE REVISED ESTIMATE WAS GENERATED BY**
4 **DEP’S “REVISED ESTIMATING TOOL.” PLEASE DESCRIBE THAT**
5 **TOOL AND YOUR UNDERSTANDING OF HOW IT WAS USED BY DEP**
6 **IN PROVIDING THE ESTIMATE.**

7 A. The RET is not an industry standard cost estimating tool. DEP has indicated that
8 the RET “applied a multivariate analysis to accounting data documenting cost
9 differences between estimates and actuals for 100+ vintage 2015-2018
10 commercially operating distribution interconnection projects in DEP and DEC.”
11 DEP’s Response to Interrogatory No. 1-15. However, the reality is that it is a
12 spreadsheet created by DEP’s internal personnel specifically for the purpose of
13 “plussing up” the cost estimates generated by DEP’s regular cost estimation tool
14 for distribution projects like Williams Solar’s in order to achieve the desired
15 increase in estimated cost. The tool employs blunt-force multipliers to take the costs
16 generated by Maximo and increase them by specified factors or sums.

17 **Q. HOW DOES THE RET WORK?**

18 A. DEP provided what appears to be a copy of the RET in discovery, Exhibit CEB-13
19 (“Copy of Time and Expense Template.xlsx”), as well as a presentation apparently
20 given at a training regarding the use of the RET, Exhibit CEB-14 (“Cost Estimation
21 Tool Presentation.pptx”). The presentation explains that the data is added to the
22 RET from Maximo work orders. The “Example” worksheet, column AJ, shows
23 that the estimate created by the RET tool simply takes the Maximo output and

1 multiplies it by relevant figures in the “T and E Assumptions” worksheet to arrive
2 at an adjusted estimate.

3 **Q. DID DEP HAVE EXPERIENCE IN USING THE RET PRIOR TO**
4 **APPLYING IT THE WILLIAMS SOLAR INTERCONNECTION**
5 **PROJECT?**

6 A. No. According to DEP, the planners began to use the updated cost estimate tool
7 for all distribution project facilities studies in DEP commencing on or about July
8 30, 2019. *See* DEP’s Response to Interrogatory No. 1-15. Coincidentally, this is
9 the same day the Revised Estimate was provided to Williams Solar, meaning, at
10 best, Williams Solar was something of a “test subject” for the new estimating tool.
11 E-mails produced in discovery indicate that DEP did not even begin training on the
12 use of the RET until August 2019. Exhibit CEB-15 (July 30, 2019 e-mail
13 scheduling “the first of two (potentially three . . .) trainings” for August 1, 2019);
14 CEB-16; CEB-17; CEB-18 (August 8, 2019 e-mail stating, “The tool is to be used
15 beginning now. The tool is operational and should be used on projects going
16 forward from today.”). Thus, at the time the Williams Solar Revised Estimate was
17 issued, DEP had not yet trained its employees in the use of the tool. And, obviously,
18 DEP had no data regarding whether the estimate produced by the RET would pan
19 out in practice.

20 **Q. WHAT FACTORS DID DEP USE IN THE RET TO “PLUS UP” THE**
21 **REVISED ESTIMATE?**

1 A. DEP included in the Revised Estimate state sales tax, inflation, contingency, and
2 overhead expenses based on multipliers or factors applied to its basic estimated
3 costs.

4 **Q. IN TERMS OF DOLLARS, HOW MUCH DID DEP'S OVERHEAD**
5 **CALCULATIONS ADD TO THE REVISED ESTIMATE?**

6 A. DEP applied varying levels of overhead for different components of cost. The total
7 dollar amount of overheads included in the Revised Estimate is \$288,376, broken
8 out as follows:

- 9 ○ Overhead on labor costs plus contingency at 25% for a total of \$145,008.
- 10 ○ Overhead on vehicles costs plus contingency at 25% for a total of \$58,003.
- 11 ○ Overhead on materials costs at 48.75% for a total of \$74,065.
- 12 ○ Overhead on contingency applied to materials at 25% for a total of \$11,300.

13 *See Exhibit CEB-6, at Interrogatory No. 1-2.*

14 **Q. IN TERMS OF DOLLARS, HOW MUCH DID DEP'S CONTINGENCY**
15 **FACTOR ADD TO THE REVISED ESTIMATE?**

16 A. DEP's Revised Estimate included a total of \$178,559 for contingency, broken out
17 as follows:

- 18 ○ Contingency on labor costs at 20% for a total of \$96,672.
- 19 ○ Contingency on vehicles costs at 20% for a total of \$36,689.
- 20 ○ Contingency on materials costs plus materials overhead at 20% for a total
21 of \$45,198.

22 *See Exhibit CEB-6, at Interrogatory No. 1-2.*

1 **Q. IN TERMS OF DOLLARS, HOW MUCH DID DEP INCLUDE FOR STATE**
2 **SALES TAX IN THE REVISED ESTIMATE?**

3 A. DEP included \$90,828.22 in its Revised Estimate for state sales tax. *See* Exhibit
4 CEB-6, at Interrogatory No. 1-2.

5 **Q. YOU PREVIOUSLY DISCUSSED THE MAXIMO TOOL USED BY DEP.**
6 **IS THAT SOFTWARE HELPFUL IN PUTTING TOGETHER A**
7 **CONSTRUCTION COST ESTIMATE?**

8 A. It can be. However, the accuracy, reasonableness and reliability of any cost
9 estimate produced though Maximo is dependent upon the validity of the cost
10 database from which the software sources or draws costs to compile an estimate.
11 By that I mean that if the cost data is outdated and not current, or the underlying
12 analysis of labor effort or equipment and materials resources is not current, the cost
13 estimates produced will be of little or no value in predicting or forecasting to a
14 reasonable degree of certainty the expected costs at completion of construction a
15 project.

16 **Q. BASED ON YOUR REVIEW OF THE DOCUMENTS, WAS DEP USING**
17 **MAXIMO IN A WAY THAT WOULD ASSIST DEP IN PROVIDING**
18 **RELIABLE AND REASONABLE CONSTRUCTION COST ESTIMATES?**

19 A. No, because the cost data DEP had loaded into Maximo was out of date—i.e., four
20 years old. Based on DEP’s responses and documentation provided thus far, DEP
21 was not updating the historical cost data in Maximo and its other cost estimating
22 tools from its experience on actual interconnection construction projects. Instead,

1 DEP's revised estimating tool essentially assumes that the data output by Maximo
2 is *not* reliable.

3 That the estimated costs DEP derives from Maximo are not reliable is
4 supported by other documents provided in discovery. DEP internal
5 communications from June 10, 2019, discussed research on estimate calculations
6 in Maximo compared to what is "real world." June 10, 2019 DEP internal e-mail,
7 attached as Exhibit CEB-19. The hourly labor rate used in Maximo was roughly
8 based on 4 men and 2 trucks. Hours for each compatible unit (CU) was roughly
9 based on Work Management Information System (WMIS) plus 20%, with WMIS
10 based on a 3-man crew. Currently base crew size is 5 men but due to ramp up efforts
11 in late 2017 and throughout 2018 crews were generally 6 men including a foreman
12 with 2 bucket trucks, 1 line truck and 1 pick-up truck. DEP concludes the
13 communication stating, "[T]his would explain the estimates from Maximo being
14 nearly 50% below the actuals. The labor cost is the largest contributing factor in
15 the overrun. This looks to be an opportunity within our Maximo program that needs
16 to be addressed as soon as possible." More problematically, rather than fixing the
17 underlying Maximo data, DEP put together the RET to simply multiply the Maximo
18 output by certain factors.

19 **IV. ANALYSIS AND OPINIONS**

20 **Q. HAVE YOU FORMED AN OPINION, OR OPINIONS, AS TO WHETHER**
21 **DEP'S INITIAL ESTIMATE OF SYSTEM UPGRADE COSTS AND**
22 **INTERCONNECTION FACILITIES COSTS WAS FAIR AND**

1 **REASONABLE AND CONSISTENT WITH PREVAILING STANDARDS**
2 **FOR CONSTRUCTION ESTIMATES?**

3 A. Yes, I have formed several opinions regarding DEP’s Initial Estimate for the
4 Williams Solar interconnection project based on my industry experience and review
5 of the documents.

6 **Opinion 1** – DEP’s Initial Estimate was an unreliable forecast of the total
7 System Upgrade and System Interconnection costs associated with the Williams
8 Solar project.

9 In fact, the evidence indicates that, across the board, DEP believes its own
10 costs estimates at the Initial Estimate phase are unreliable forecasts or predictions
11 of the total costs of construction that DEP will later seek to recover from
12 interconnection customers for System Upgrades and Interconnection Facilities
13 costs. DEP expects interconnection customers like Williams Solar to make a
14 crucial investment decision to move forward, or not, with an interconnection project
15 based on cost estimates that DEP itself believes are unreliable and unreasonable.

16 This opinion is based on the fact that DEP’s cost estimating processes and
17 procedures at the Initial Estimate phase produced costs estimates that are
18 substantially lower than DEP’s cost estimates at the Revised Estimate phase, a
19 difference that is not within the expected range of accuracy for cost estimates when
20 compared to the custom and practice of industry. In fact, DEP’s historical cost
21 estimating records (CONFIDENTIAL DR No. 1-17 Williams Solar, attached as
22 Exhibit CEB-21) for projects other than the Williams Solar interconnection project
23 shows that the average claimed increase in estimated costs from DEP’s Initial

1 Estimate to its Revised Estimate is <BEGIN CONFIDENTIAL> [REDACTED]
2 [REDACTED] <END CONFIDENTIAL> the amount of the Initial Estimate.

3 Moreover, DEP's historical cost estimating record for projects other than
4 the Williams Solar interconnection project shows that the average increase in
5 claimed estimated costs from DEP's Initial Estimate phase through to its
6 Construction Cost Notice Total phase is <BEGIN CONFIDENTIAL> [REDACTED] <END
7 CONFIDENTIAL>. Thus, in all phases of its cost estimating process, DEP has
8 historically underestimated the costs it would ultimately claim it was entitled to
9 recover from Interconnection Customers.

10 Most notably, in the time span between DEP's Initial Estimate in January
11 2019 and its Revised Estimate in July 2019, DEP along with Duke Energy
12 Carolinas, LLC identified a combined cost exposure of approximately \$30 million
13 arising from the unreliable results coming from DEP's cost estimating
14 performance. See June 6, 2019 internal DEP e-mail chain "Re: DEP and DEC
15 Exposure," attached as Exhibit CEB-20.

16 **Opinion 2** – DEP knew, or should have known, at the time of its preparation
17 of the Initial Estimate, in or about of December 2018, that its cost estimation
18 procedures would result in a cost estimate that was unreliable and unreasonable, as
19 DEP had been investigating discrepancies between its cost estimates and actual
20 construction costs for nearly a year. Further, DEP knew, or should have known,
21 that DEP's historical cost data relied upon in preparation of the Initial Estimate was,
22 at that time, a minimum of four years old.

1 In DEP’s Response to Williams Solar’s Interrogatory No. 1-14, DEP
2 described the chronological sequence of and individuals participating in its
3 investigation into the accuracy and reasonableness of its cost estimates for
4 independent generator interconnection projects, as had been referenced in DEP’s
5 Answer and Motion to Dismiss at pages 4 and 5. DEP claims it had observed
6 discrepancies between estimated construction costs and actual construction costs
7 for distribution interconnection projects coming on line during the fourth quarter of
8 2017.

9 This means that the Initial Estimate (and Revised Estimate) for the projects
10 for which discrepancies had been noted were prepared well before the end of 2017,
11 when DEP has identified it was aware of discrepancies between earlier estimated
12 costs of interconnection projects and actual construction costs.

13 In DEP’s Responses to Williams Solar’s Interrogatory No. 1-7, DEP
14 confirmed that the cost data it relied upon for Preliminary Estimated Upgrade
15 Charges was not updated in the time period between January 1, 2015 and June 2019.
16 DEP’s update to this cost data in June 2019 came well after the Initial Estimate was
17 provided to Williams in January 2019. Further, DEP explained that the updated
18 System Impact Study Report cost estimating tool “SIS Estimation Tool Rev1” was
19 not created until June 2019. Also, DEP represents that in June 2019 it updated SIS
20 Estimation Tool Rev1 with “an additional contingency factor of 2.0”, after DEP
21 had completed a number of generator interconnection Final Accounting Report
22 (FAR) true ups. *See* DEP’s Response to Williams Solar’s Interrogatory No. 1-7.

1 **Q. HAVE YOU FORMED AN OPINION, OR OPINIONS, AS TO WHETHER**
2 **DEP’S REVISED ESTIMATE OF SYSTEM UPGRADE COSTS WAS**
3 **REASONABLE AND CONSISTENT WITH PREVAILING STANDARDS**
4 **FOR CONSTRUCTION ESTIMATES OF THIS KIND?**

5 A. Yes, I have an opinion based on my industry experience and review of the
6 documents.

7 **Opinion 3** - DEP’s Revised Estimate was an unreliable forecast of the total
8 cost DEP will seek to recover from Williams Solar at the completion of
9 interconnection construction.

10 The method used by DEP to generate the Revised Estimate results in
11 unreliable forecasts of the total costs of construction that DEP seeks to recover from
12 Interconnection Customers for System Upgrades and Interconnection Facilities
13 costs. DEP expects Interconnection Customers to make a second crucial
14 investment decision to move forward, or not, with an interconnection project from
15 the Facilities Study Report phase into the Interconnection Agreement phase based
16 on cost estimates that are unreliable and unreasonable.

17 DEP’s RET does not produce estimates based on historical experience with
18 similar projects as one would expect. Rather, it takes Maximo estimates based on
19 apparently outdated historical experience with similar projects and multiplies the
20 admittedly unreliable and unreasonable Maximo output by factors that DEP
21 apparently derived from some sort of “multivariate analysis.” I have never seen an
22 estimate created in this way. It is disconcerting that the starting assumption of
23 DEP’s process is that the underlying data (Maximo output) is outdated and

1 unreliable. I am not aware of any statistical analysis that would allow one to
2 “correct” bad historical data and this approach is not consistent with reasonable
3 construction estimating procedures. What DEP has done with its RET brings to
4 mind the phrase “garbage in, garbage out,” a phrase that captures the idea that no
5 computation can “fix” the problems that arise when inputs are unreliable. Rather
6 than generating an estimate from first principles using the 2015-2018 data in DEP’s
7 possession, DEP has cobbled together a Frankenstein’s monster, the only function
8 of which seems to be to generate higher estimates than what Maximo produces with
9 an admittedly outdated database.

10 DEP’s effort to break down the multipliers it uses to adjust the Maximo
11 output into categories like “overheads” and “contingencies” seems to me to be
12 window dressing. The multipliers are really just that—gross up multipliers. In that
13 light, the multipliers used in the RET are really no different from the “additional
14 contingency factor of 2.0” that DEP added to the SIS Estimation Tool Rev1.

15 **Q. HAVE YOU FORMED AN OPINION AS TO WHETHER THE WAY DEP**
16 **INCLUDED OVERHEAD EXPENSES IN ITS REVISED ESTIMATE WAS**
17 **REASONABLE AND CONSISTENT WITH PREVAILING STANDARDS**
18 **FOR CONSTRUCTION ESTIMATES OF THIS KIND?**

19 A. Yes, I have an opinion based on my industry experience and review of the
20 documents.

21 **Q. WHAT IS THAT OPINION?**

22 A. **Opinion 4** – DEP’s application of overhead expenses at the purported rate of 25%
23 after the inclusion of “contingency” in its cost estimating process is contrary to

1 industry custom and practice and unreasonably inflates the contingency. More
2 particularly, DEP applied overhead to materials costs at the rate of 48.75%, then
3 computed contingency at the rate of 20%, and further added another 25% of
4 overhead to the contingency applied to materials costs. In addition, DEP's
5 application of overheads to the estimated costs of work to be performed by DEP's
6 contractors and/or subcontractors indicates the potential duplication of overhead
7 costs charged by DEP to the Interconnection Customers for a project.

8 **Q. DO YOU HAVE ANY RECOMMENDATIONS FOR THIS ISSUE WITH**
9 **REGARDS TO ADDRESSING THIS ISSUE GOING FORWARD?**

10 A. Although my testimony criticizes the manner in which DEP has applied overhead
11 costs in arriving at its cost estimates, I have not reviewed the specific manner in
12 which DEP has calculated its overhead costs and allocated them across different
13 interconnection tasks—nor has DEP provided this information in discovery. To the
14 contrary, all evidence indicates that, at least as applied to Williams Solar, DEP
15 allocated overheads through “blunt force”—not through a specific analysis of
16 estimated cost. I would encourage the Commission to explore this issue in a more
17 general proceeding since it is an issue that cuts across all projects and potentially
18 impacts ratepayers as well.

19 **Q. HAVE YOU FORMED AN OPINION AS TO WHETHER THE WAY DEP**
20 **APPLIED A CONTINGENCY FACTOR IN ITS REVISED ESTIMATE**
21 **WAS REASONABLE AND CONSISTENT WITH PREVAILING**
22 **STANDARDS FOR CONSTRUCTION ESTIMATES OF THIS KIND?**

1 A. Yes, I have an opinion based on my industry experience and review of the
2 documents made available thus far.

3 **Q. WHAT IS THAT OPINION?**

4 A. **Opinion 5** –Based on DEP’s purported level of engineering design definition of
5 work scope for use in preparing its Revised Estimate, I would expect the application
6 of contingency would be minimized and certainly less than the 20% contingency
7 applied by DEP. This suggests DEP’s apparent use of contingency as merely a
8 factor to increase estimated costs rather than the intended purpose in industry for
9 contingency to represent the risk of unknown circumstances. Moreover, DEP had
10 been constructing interconnection projects for a minimum of four to five years and
11 had data from its actual costs of construction in comparison to its estimated costs
12 at the Facility Study phase. As such, DEP knew the work required to actually
13 construct interconnection projects and its application of a contingency at 20% was
14 too high.

15 Contingency as a component of a cost estimate should be at its largest dollar
16 amount when the definition of work scope for the project is limited and at its
17 smallest amount when the full scope of work is defined. The Revised Estimate is at
18 a greater level of maturity, thus the expected range of estimation in comparison to
19 actual cost of construction is narrowed, and the contingency should be low.

20 **V. DEP’S ATTEMPT TO IMPROVE COST ESTIMATING**

21 **Q. HAVE YOU FORMED AN OPINION ON WHETHER DEP HAS**
22 **IMPROVED ITS PROCESSES FOR COST ESTIMATING ON UPGRADE**
23 **PROJECTS?**

1 A. Yes, I have an opinion based on my industry experience and review of the
2 documents.

3 **Q. WHAT IS THAT OPINION?**

4 A. **Opinion 6** – If DEP has in fact improved its cost estimating procedures, that
5 improvement was not evident from any of the documents I have reviewed to date
6 and, in any event, it came too late to be relevant to estimates prepared by DEP for
7 Williams Solar.

8 First, as to estimation at the System Impact Study stage, the Initial Estimate,
9 DEP is simply multiplying estimates based on pre-2015 data by a factor of 2. DEP's
10 new estimating procedure simply is not consistent with any reasonable estimating
11 practice of which I am aware.

12 Second, as to estimation at the Facilities Study stage, the Revised Estimate,
13 DEP, in its Revised Estimating Tool, has taken an approach that appears more
14 sophisticated than the simple factor of 2 applied at the System Impact Study stage.
15 However, in reality the changes DEP made by the time the Williams Solar Revised
16 Estimate was produced were simply multipliers applied to Maximo output. This
17 does not seem to be an improvement except in the sense that the previous estimates
18 may now be unreliable and unreasonable in a different way.

19 In DEP's Response to Interrogatory No. 1-15, DEP discussed the
20 chronological sequence of updating its cost estimating methodology. With the
21 commencement in first quarter 2018 of further investigation of observed
22 discrepancies between estimated construction costs and actual construction costs
23 for distribution interconnection projects coming on line during the fourth quarter of

1 2017, DEP did not begin to explore improvements to its existing estimating tools
2 that were utilized for cost estimates prior to construction until the fourth quarter of
3 2018. In the third quarter of 2019, final approvals and instruction from within the
4 Duke organization were to ensure the updated cost estimate tool was utilized for all
5 interconnection facilities studies in DEP and DEC going forward. This was
6 coincidental with DEP's July 30, 2019 issuance of its Revised Estimate for
7 Williams Solar. Duke did not commence training its personnel in the use of its
8 revised tool until early August 2019, after issuance of Williams Solar Revised
9 Estimate, for use on projects going forward from that point in time.

10 DEP does claim that it made some data updates to labor hours and hourly
11 labor costs in Maximo in Q4 2019. DEP has acknowledged that "[t]hese would not
12 have had an impact on the development of cost estimates associated with cost
13 estimates provided to Williams Solar." *See* DEP's Response to Interrogatory No.
14 1-10.

15 **Q. HAVE YOU PROVIDED THE DOCUMENTS REVIEWED AND RELIED**
16 **UPON BY YOU IN ARRIVING AT YOUR OPINIONS?**

17 A. Yes. The documents relevant to my Testimony and that informed my opinions are
18 identified herein and are attached as Exhibits.

19 **Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?**

20 A. Yes.

Exhibits List

CEB-1	Bolyard CV
CEB-2	List of Documents Reviewed
CEB-3	Initial Estimate (E-mail from Lee P. Winter, Duke Energy, to Williams Solar dated Jan. 29, 2019, transmitting System Impact Study Report, Facilities Study Agreement, and Request for Information)
CEB-4	System Impact Study Report (dated December 20, 2018)
CEB-5	Internal DEP e-mail dated December 19, 2018, transmitting the System Impact Study Report
CEB-6	Respondent Duke Energy Progress, LLC's Responses to Complainant's First Set of Interrogatories and Requests for Production of Documents
CEB-7	Duke Energy Progress, LLC, Supplemental Responses to Complainant's First Set of Interrogatories and Requests for Production of Document
CEB-8	Williams Solar Estimation Tool SIS.xlsx
CEB-9	SIS Estimation Tool Rev1.xlsm
CEB-10	Revised Estimate (E-mail from Lee P. Winter to Williams Solar dated July 30, 2019)
CEB-11	E-mail correspondence "Re: Facility Study Report, Williams Solar, LLC CHKLIST," between July 30, 2019, and August 16, 2019
CEB-12	Overview of Revised Estimating Tool – Williams Solar (Produced in Response to Data Request No. 1-3)
CEB-13	Copy of Time and Expense Template.xlsx
CEB-14	Cost Estimation Tool Presentation
CEB-15	July 30, 2019 e-mail re: Cost Estimation Training
CEB-16	August 1, 2019 e-mail re: Cost Estimation Tool Presentation.pptx
CEB-17	August 1, 2019 e-mail re: Conference Line for Cost Estimation Training

CEB-18	August 8, 2019 e-mail re: Cost Estimation Tool Start Date and Consistency Issues
CEB-19	June 10, 2019 DEP internal e-mail
CEB-20	June 6, 2019 internal DEP e-mail chain "RE: DEP and DEC Exposure"
CEB-21	CONFIDENTIAL DR No. 1-17 Williams Solar

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Exhibit CEB-1

Bolyard CV



PROFESSIONAL BACKGROUND

Name: Charles E. Bolyard, Jr.

Address: McDonough Bolyard Peck, Inc. (MBP)
3040 Williams Drive, Suite 300
Fairfax, Virginia 22031

Occupation: Construction Engineering Consultant

Where Employed: McDonough Bolyard Peck, Inc. (MBP)

Position: Chairman of the Board of Directors

Education: Bachelor of Science Civil Engineering 1974
West Virginia Institute of Technology
(now West Virginia University Institute of Technology)
Montgomery, West Virginia

Estimating, Bidding, and Cost Control
Catholic University of America, Washington, DC
Graduate Study 1976-1977

Certifications: Certified Construction Manager (CCM), CMAA, 2014

Planning and Scheduling Professional (PSP), AACEI, 2004

Certified Forensic Claims Consultant (CFCC), AACEI, 2007

Membership in Professional Associations: Member and Fellow, AACE International (AACE)
Chairman – Certification Associate Board

Life Member, American Society of Civil Engineers (ASCE)

Member, Chief Executive Network (CEN)

Member and Fellow, Construction Management Association of America (CMAA)

Member, Dispute Resolution Board Foundation (DRBF)



Work
Experience:

June 1974 to June 1978: Bechtel Associates Professional Corporation – Senior Field Engineer/Owners representative on WMATA subway construction in the Washington D.C. area. Projects included mined tunnels, cut and cover tunnels/station, station in retained cut and aerial structures. Duties included field inspection, shop drawing review, quantity take-offs and cost estimating, CPM scheduling review and updates, constructability review, delay analysis, preparation of project documentation in support of pending change orders and contract modifications, negotiation of contract modifications, analysis of claims and project closeout. Projects included Pentagon City Station and Line; Grosvenor Station and Line; Silver Spring, Takoma, Fort Totten and Brookland Stations; and King Street Station and Line.

June 1978 to December 1979: Expressway Constructors – Design/Estimating Engineer and Chief Field Engineer. Designed excavation support and utility support systems and concrete formwork for subway and urban heavy highway projects; prepared detailed quantity take-offs, crew analyses and bid estimates for hard money transit and heavy construction projects; prepared, monitored and updated CPM schedules; administered subcontracts; and managed field survey crews, and geotechnical instrumentation installation and monitoring; drilling and blasting, utility relocations; installation of excavation support and street decking systems, and project closeout. Representative projects included two sections of Interstate I-66, Arlington, VA; VA Route 7, Hamilton, VA; Grosvenor Station and Line, MD; Penn North Station, Baltimore, MD; transit projects in Atlanta, GA; Four Mile Run Flood Control Project, Arlington, VA; and Savage River Project, Bloomington, MD.

December 1979 to January 1990: Alpha Corporation – Projects Engineer and Vice President. For contractors and owners provided construction engineering services including cost estimating, bidding, CPM scheduling, on-site project management, design of excavation and



utility support systems, slope stability analysis, dewatering system design, project management oversight, claim analysis, litigation support and expert testimony. Representative projects included Interstate I-66 utilities construction, Rosslyn, VA; Cross Town Water Main, Washington, D.C.; East and West Approaches Fort McHenry Tunnel, Baltimore, MD; Anacostia River Sunken Tube Tunnel option, Washington, D.C.; Hannibal Lock and Dam Power Station, WV; Raystown Dam Power Plant Intake Structure, PA; Hartsville and Phipps Bend nuclear power plants, TVA, TN; Gallatin fossil fuel power plant, TVA, TN; Lake Chicot Pumping Station, LA; transit projects in Washington, D.C., Baltimore, MD, Atlanta, GA, Philadelphia PA, and Pittsburgh, PA, Consolidated Space Operations Center, CO; Water and wastewater treatment plants; various Coast Guard pier and wharf projects; and twenty-two federal building projects.

January 1990 to Present: MBP – Executive Vice President, President, CEO, and Chairman. Responsible for cost estimating, CPM scheduling, construction management and claims analysis and litigation support projects involving heavy construction, process plant, power plant, industrial, transportation, and building projects. Provided factual and expert testimony on topics related to construction means and methods, trade coordination, estimated and actual construction costs, CPM scheduling and delay analysis and impacts, inefficiency, and damages analysis. Venues for testimony include AAA Arbitrations, Corps of Engineers Board of Contract Appeals, Federal Bankruptcy Court, Department of Veterans' Affairs Board of Contract Appeals, Corps of Engineers and Pennsylvania Department of Transportation minitrials; Pennsylvania Board of Claims, State District Courts, Court of Federal Claims, Federal Circuit Court and Civilian Board of Contract Appeals. Developed and presented instructional training seminars on topics including records management, cost management, estimating, bidding, CPM scheduling, delay analysis techniques and damages computations which are presented to numerous public and private entities.

Charles E. Bolyard, Jr., CCM, PSP, CFCC

Chairman

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Education

BS, Civil Engineering, West Virginia Institute of Technology, 1974

Professional Certifications/Registrations

Certified Construction Manager (CCM)

Planning & Scheduling Professional (PSP)

Certified Forensic Claims Consultant (CFCC)

OSHA 10-Hour Course Construction Safety & Health

Professional Associations

Member and Fellow, Chairman – Certification Associate Board, AACE International (AACE)

Life Member, American Society of Civil Engineers (ASCE)

Member, Chief Executive Network (CEN)

Member and Fellow, Construction Management Association of America (CMAA)

Member, Dispute Resolution Board Foundation (DRBF)

Background

Mr. Bolyard has more than 46 years of program and construction management experience for owners and contractors. He has served as inspector, estimator, scheduler, senior field engineer, project engineer, and project manager. His project experience includes mined tunnel, cut-and-cover tunnel, at-grade and aerial mass transit; drainage, utilities, grading, paving, bridge and highways; water and wastewater treatment plants; process plants; hydro, fossil fuel and nuclear power plants; manufacturing facilities; detention facilities; and commercial, high rise, educational, hospital, healthcare and special use buildings. Heavy civil engineering applications include electrical/mechanical/instrumentation systems in buildings, plants, and facilities. Extensive experience for owners and contractors in CPM scheduling, cost estimating, management, constructibility review, delay analysis, damages analysis and construction claims analysis, and has provided expert testimony, litigation support services, and has served as mediator and a third-party neutral in the resolution of construction disputes. Mr. Bolyard is an active member and Fellow of AACE International. He serves on AACE's Board of Directors as Past President and has previously served in the capacities of President, President-Elect, Vice President of Certification, Co-chairperson of AACE's Certification Board, and within the Certification Board, as Chairman of the Certified Forensic Claims Consultant (CFCC) Committee. In 2011, he was inducted into the College of Fellows for the Construction Management Association of America (CMAA). As MBP's Chairman, Mr. Bolyard is actively involved in MBP's strategic initiatives and planning for continuing growth.

Relevant Experience

AES Coal Fired Power Plant, Guayama, PR: As Principal-in-Charge, prepared an expert report determining the responsibility for compensable delays and an accompanying expert report for damages analysis and cost impacts. The plant was the first coal-fired power project constructed in Puerto Rico and consisted of two coal fired boilers with circulating dry scrubbers/precipitators, two turbine generators, and related plant equipment. The plant also incorporated, for the first time ever, the use of a scrubber for the clean-up of the flue gasses from the boiler. The combination of these technologies made this plant one of the cleanest coal burning plants in the world. The total construction value was \$500 million.

Automatic Train Control for the Outer F Route Extension, WMATA, Prince George's County, MD: As Principal-in-Charge, evaluated contractor delay claim and participated in negotiated settlement. The project involved design, fabrication, installation, and testing of an automatic train control system,

Charles E. Bolyard, Jr., CCM, PSP, CFCC
Chairman

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spanning over seven train stations and track. The total construction value was \$17 million.

Back River Wastewater Treatment Plant, Baltimore City, MD: As Senior Consultant, conducted independent delay analysis and review of project records. Rehabilitation of 50 existing rotary distributor type trickling filter mechanisms, cleaning of filter bed stone and drains, and construction of new trickling filter pumping station while maintaining operation of trickling filters to meet treatment demands. Contractor claimed critical delays due to late delivery and failure of owner-supplied parts for repair of existing rotary distributors. Contractor also claimed City directed work to be performed out of sequence and after the original contract completion date.

Bay Area Rapid Transit (BART) Silicon Valley Berryessa Extension Project, Warm Springs to Berryessa, C700 Line, Track, Stations and Systems: As Senior Consultant, conducted a detailed review of the Design-Build Contractor's claim, followed by independent computation of its validity. The project involves a 10-mile extension of the existing BART rail system with Valley Transportation Authority (VTA) as the owner of the right-of-way and facilities. BART has the responsibility of the train/systems integration and operations, as well as maintenance. The project consists of two rail stations, Milpitas (in retained cut) and Berryessa (aerial), 7.5 miles of wayside at grade and on aerial structures, and 2.5 miles of wayside in a retained trench structure, with 800 feet of double box cut and cover structure. The project was constructed in right-of-way traversing a combination of industrial and residential neighborhoods. The total construction value was \$777.2 million.

Belleville Power Plant, Belleville, WV: As Principal-in-Charge and on behalf of surety and estate of the contractor, provided an independent analysis of schedule and cost in response to EPC contractor's request for time extension and additional compensation. Provided testimony at deposition. The project consisted of the construction of a hydroelectric power generating station on the Ohio River at the West Virginia (East) end of the existing U.S. Army Corps of Engineers Dam. The project involved building a two-unit, low head, horizontally positioned, bulb type turbine power generating plant. The structure is a submersed reinforced concrete powerhouse and gravity dam designed to abut the existing concrete dam on the Ohio River. The total construction value was \$135 million.

Boiler/Chiller Plant, Reagan National Airport, Washington, DC: As Project Manager, reviewed project documentation and analyzed delays. Presented findings at mediation. The project involved the construction of a new boiler/chiller plant to provide high temperature hot water and chilled water for HVAC systems in the new terminal and the existing terminal. Key features included one mile of underground concrete tunnel with hot and cold water

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pipng, boiler/chiller building housing three hot water generators, three chillers, cooling towers, water circulating pumps, water treatment, electrical power systems, digital distributed control system, chilled water storage tank, alternative fuel tanks, connections to and enhancement of existing mechanical systems in remote buildings, and appurtenant sitework. The total construction value was \$25 million.

Capitol Visitor Center, Washington, DC: As Principal-in-Charge, provided independent analysis of costs to complete construction, independent CPM schedule oversight and periodic updating of the schedule for the second phase of construction, and provided independent risk management program implementation and monitoring. Required interface with multiple contractors, Architect of the Capital project staff and the US Government Accountability Office. The project involved the \$400 million construction of a new Capitol Visitor Center. The total construction value was \$600 million.

Clark County Advanced Wastewater Treatment Plant, Las Vegas, NV: As Project Engineer, prepared delay claim against general contractor; conducted detailed research; and inspected civil work delays, change orders, coordination errors and equipment substitution problems. Project involved complete range of claims analysis services on complicated project involving substitute equipment, segmental staging, and computerized interface between clients electrical and instrumentation work with the mechanical equipment. Specifications called for general contractor to redesign plant if required to accommodate the substitute equipment. Contractor claimed that owner was responsible for redesign, because the substitute equipment was approved in a formal pre-bid submittal. The total construction value was \$7.5 million.

Climatic Testing Laboratory, Eglin Air Force Base, FL: As Principal-in-Charge, provided delay analysis services. The project included the renovation of two climatic test chambers, renovation and additions to administrative work areas and mechanical/electrical equipment areas, and a modification of the firewater pump house interior. It also involved a new 500-pound-mass per second air make-up unit (AMU) including methylene chloride (R30) and calcium chloride (CaC12) brine storage tanks, new brine regeneration heat exchangers/pumps, new package steam boiler, and a new 200,000-gallon fire water tank. It included a new aqueous film forming foam (AFFF) retention pond and oil water separator, as well as new 115-kilowatt and 480-volt distribution and substations. The project involved the relocation of the armaments tow-away, miscellaneous building relocations, new cooling towers, and new building additions. The total construction value was \$50 million.

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Colver Power Plant, Colver, PA: As Principal, performed an independent evaluation of the time impact for failure and repairs associated with the project. The plant is a base load 110 MW single unit power station fueled by coal refuse and utilizing combined fluidized bed boiler technology and steam turbine generator. The total construction value was \$12.9 million.

Conoco Pipeline, The Cardinal State's Gathering Line, Grundy, VA: As Principal-in-Charge, performed delay and issue analysis, researched project records, performed detailed as-built schedule analysis, and review contractor's claim. Project involved the construction of 260,000 feet (50 miles) of 16-inch pipeline to collect coalbed methane gas through steep slopes and along mountain ridges throughout Virginia, West Virginia, and Kentucky. Work included clearing of right-of-way, rock blasting, excavating, welding of pipe, backfill, and testing. Contractor defaulted for non-performance. The total construction value was \$18 million.

Consolidated Space Operations Center, Colorado Springs, CO: As Project Manager, provided detailed research, analysis, discovery, and expert testimony at mini-trial. Project involved the Consolidated Space Operations Center (CSOC) for use by the Air Force Strategic Defense Initiative. The seven-building complex included RF shielding security and independent water, fuel storage, power generation, and sewage treatment systems. Contractor filed a claim for delay, acceleration, and disruption due to the cumulative effect of change orders. The total construction value was \$84 million.

Cross County MetroLink Extension, Segment I, St. Louis, MO: As Principal-in-Charge on behalf of joint venture design and construction management consultant, performed detailed schedule delay and damages analysis and expert report and provided expert testimony during the jury trial. The project consisted of the design and construction of a seven-mile-long extension of the St. Louis light-rail transit system. It included construction of underground, elevated, and at-grade rail through urban areas; construction of ten new stations; reconfiguration of an existing station; real estate acquisition; coordination with existing municipalities, utilities, and other stakeholders; and systems integration. The total construction value was \$550.3 million.

Dulles Corridor Metrorail Project, Phase 2, Herndon, VA: The project consisted of the design and construction of Phase 2 of the Dulles Corridor Metrorail Project (DCMP Phase 2). This included six new heavy rail stations, trackwork, roadway improvements, surface and garage parking facilities, relocation of existing utilities, stormwater management, traction power sub stations, station platforms, kiss and ride stations, pedestrian bridges, at grade and elevated guideways, and support infrastructure. The project also included

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a service and inspection rail yard. The total construction value was \$3.5 billion.

Deer Island Wastewater Treatment Plant, Boston, MA: As Principal-in-Charge, prepared contractor's bid cost estimate. The project included deep foundation excavations, earth surcharge, pile driving, site utilities, structural slurry wall, concrete structures including process gallery, sludge thickening tanks, thickened sludge building, digester gas collection, residuals gallery, operations/odor control; eight egg-shaped sludge digesters and two egg-shaped gas storage tanks; and process equipment, mechanical systems, electrical and instrumentation/controls. The total construction value was \$189 million.

Integrated Gasification Combined Cycle Power Station, USA: As Project Executive on behalf of EPCM constructor and process equipment manufacturer, analyzed claims from owner regarding cost estimating standard of care, change management standard of care, re-estimates and reforecasts of costs of construction, and provided testimony at arbitration conducted through International Institute for Conflict Prevention and Resolution. EPC design and construction of a 629 MW IGCC Power Station. The total construction value was \$3.5 billion.

Port Arthur Refinery Crude Expansion, Port Arthur, TX: As Senior Testifying Expert, reviewed project documentation, evaluated the performance of the parties, prepared expert report and provided testimony at deposition and at hearing under the auspices of the International Institute for Conflict Preventions and Resolution. Issues for which testimony was provided included cost estimating standard of care, cost management standard of care during design and construction performance, and reasonableness of cost estimates and cost forecasts during management and reporting of actual cost to budget, changes, and trending. The project involved the expansion of existing crude oil refinery to increase capacity by 325,000 BPD. The total construction value was \$10 billion.

Gallatin Power Station/Hartsville and Phipps Bend Nuclear Power Plants, TN: As Senior Consultant on the Hartsville and Phipps Bend Nuclear Power Plants, evaluated delays and costs associated with fabrication of steel embedments for wet well and dry well of nuclear reactors. On the Gallatin Power Station, evaluated delays and costs associated with construction of electrostatic precipitators at this coal-fueled power plant. The project involved claims for constructive acceleration to complete work for plant upgrades to meet EPA emission standards. Delays claimed due to change in subsurface conditions and late approval of shop drawings. Included additional costs of night shift and cold weather inefficiencies. The total construction value was \$6 million.

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Gramercy Works Digester Rebuild, Gramercy, LA: As Principal-in-Charge, provided on-site review of construction status, schedule, cost accounting, change management, claims analysis, and expert testimony both in court and at mediation. Project involved the reconstruction of the digester area, which included foundation piling, structural concrete, steel framed structural supports and pipe racks, installation of fabricated pressure vessels, installation of specialty alloy high pressure piping, electrical power substation, process instrumentation and controls, testing, and startup. The project involved an industrial plant complex that is mid-way between Baton Rouge and New Orleans along the Mississippi River. The main components of the facility are the off-loading and storage system that conveys bauxite ore mined in Jamaica from ocean-going ore ships to the plant ore preparation area; the power plant provides electrical power and high pressure steam exclusively for plant use, and the refinery that processes the raw bauxite ore into alumina powder. The alumina powder is then used in the smelting of aluminum metal and in the production of aluminum paints and coatings. The plant is a complex system of high pressure alloy piping, pressure vessels, clarifiers, and settling tanks used in the process of refining the alumina powder. The total construction value was \$458 million.

Hardy Storage Compressor Station, Mathias, WV: As Principal-in-Charge on behalf of design engineer, provided delay and damages analysis. The project involved the design and construction of natural gas compressor station for storage and recovery of natural gas. The total construction value was \$70 million.

Iowa Fertilizer Plant OEC-MEI Federal Case (Downstream), Wever, IA: As Senior Consultant, provided quality control review of schedule delay and costs/damages analysis expert report. The Project involved the Iowa Fertilizer Plant, located in Wever, Iowa, in the southeastern part of the state. The Plant is a major ammonium nitrate plant being constructed at a cost in excess of \$1.5 billion. The major process components of the Plant consist of an ammonia production facility, converting natural gas in ammonia, and the fertilizer production areas (referred to as the “downstream plant”) that include the production of urea, granulated urea, nitric acid, ammonium nitrate solutions including UAN and diesel exhaust fluid (DEF). The total construction value was \$2 billion.

Jeffrey Energy Center, St. Marys, KS: As Principal-in-Charge, performed labor loss of efficiency analysis and delay analysis. The project involved selective catalytic reduction process, additions and alterations to the existing Jeffrey

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Energy Center coal-fired electrical power plant. The total construction value was \$24 million.

Lee Power Station, Anderson County, SC: As senior claims analyst performed schedule delay and impact analysis and labor loss of efficiency analysis. Construction of a new 750 MW combustion turbine combined cycle electrical power generating facility. Two gas fired combustion turbine generators, two HRSGS, and one steam turbine generator. Project also included associated power block and balance of plant equipment to include steam condenser and cooling tower among other features. Distributed Control System (DCS) for overall plant operations and monitoring performance.

Mayo Power Plant, Roxboro, NC: As Senior Claims Analyst, reviewed project documentation and performed analysis of expert and rebuttal reports. The power plant project involved the fabrication of a zero liquid discharge (ZLD) process for Progress Energy. The engineering and design services were estimated at \$640,530 and the steel fabrication estimated at \$704,000 with fabrication set to have an approximate six month duration. The total construction value was \$75 million.

Modular Nuclear Plants, Lake Charles, LA: As Senior Claims Analyst and Expert, provided consulting on measured mile analysis, direct and indirect cost build-up, and productivity factors used in the development of a Request for Equitable Adjustment. The project involved the fabrication and assembly of structural, piping, and equipment modules for two new nuclear power plants. The total construction value was \$5 billion.

Munitions Maintenance Facility, Hurlburt Field, FL: As Principal, performed investigation and technical analysis of contractor's claim, including delay damages and direct cost analysis. Provided expert testimony and litigation support at trial. Project included masonry construction of a four-bay shop facility and office, along with a separate 20-bay munitions storage building. The total construction value was \$2 million.

NIPSCO Schafer Station Unit 15, Wheatfield, IN: As Principal-in-Charge, prepared labor loss of efficiency analysis during power plant outage. NIPSCO's R M. Schafer Generating Station Unit 15 is an existing fossil fuel (coal) fired power station. Project involved four existing electrical generating units at Schafer including Unit 15. NIPSCO undertook the rebuild of the electrostatic precipitator for Unit 15 to convert from hot-side to cold-side operation in order to accommodate use of Powder River Basin (PRB) coal. The total construction value was \$25 million.

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Hyper-pure Polysilicon Production Facility, Charleston, TN: As Executive Expert, reviewed project documentation and affirmative expert reports of claimant, and provided analysis and opinions in response to claimed monetary damages theoretical estimating methodology and quantification. The total construction value was \$2.5 billion.

Rock Crusher Facility, Morehead City, NC: As Principal-in-Charge, responsible for investigation and technical analysis of disputed issues on behalf of PCS Phosphate. Reviewed project documents, analyzed delay and entitlement, disputed costs, direct and indirect costs and prepared an expert report in preparation for trial. The project was intended for the processing of imported phosphate pebbles with potential processing of rejects from the phosphate washer process. This would enable the Aurora plant to supplement production at the plant and increase available phosphate concentrate inventory. The project consisted of a two stage grinding system to process phosphate materials, with the capability to produce product, at a rate of 50 to 80 tons per hour, at a maximum dimension of 2 ½ inches in diameter. The total construction value was \$1.5 million.

Ship Self Defense Engineering Facility, Wallops Island, VA: As Principal-in-Charge, prepared detailed as-built schedule and delay analysis and labor loss of productivity analysis. The project consisted of a 32,000-square-foot two-story concrete and steel frame research and development laboratory on pile foundations. Work included pre-finished metal exterior wall panels, two ply bituminous roofing, masonry and metal stud interior partitions, raised access flooring, elevator, plumbing, HVAC, compressed air system, fire sprinkler and de-mineralized water system. Electrical systems included main switchgear, individual room transformers and distribution panels, as well as electronic signal grounding and tempest shielding. Also included was a 215-foot-tall steel and fiberglass antenna mast on pile foundation.

Tennessee Valley Authority/Jones-Hailey Joint Venture: As Senior Consultant, performed schedule and cost analysis services. Reconstruction of five-mile long Ocoee Reservoir wooden flume water intake for hydroelectric power plant in the mountains of Cherokee National Forest. Contractor claimed delays due to owner's alleged denial of access, design errors, erroneous interpretation of the specifications, extra work, and underpayment for work performed.

Tennessee Valley Authority/McKinney Drilling Company: As Senior Consultant, performed claims analysis services. The project involved caisson construction for electrostatic precipitator foundations for Cumberland power plant. It included 30-48-inch reinforced concrete caissons drilled in soil and rock using earth augers and down-the-hole rock drills. Contractor claimed delay and disruption due to differing geotechnical site conditions,

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interferences, and out-of-sequence and inefficient work. The total construction value was \$600,000.

Union Camp Pulp and Paper Mill Plant, Franklin, VA: As Principal-in-Charge, performed a detailed analysis of the claim and prepared independent report of findings. Project involved construction of a new steam/electricity cogeneration power plant to serve a pulp and paper mill. As a consortium member, Westinghouse Electric Corporation's primary responsibility was the power island consisting of the turbine, generator, and auxiliaries. The consortium members claimed against Westinghouse for extended overhead, construction acceleration, loss of early completion bonus, additional insurance costs, cost of additional carbon monoxide catalyst, and miscellaneous engineering and construction back charges. The total construction value was \$43.8 million.

Wildcat Point Generation Facility, Conowingo, MD: As Senior Testifying Expert on behalf of electrical power utility, owner reviewed project documentation, reviewed and evaluated contractor's expert reports on schedule delay and loss of productivity, and prepared rebuttal analysis and filed report in response to claimed schedule delay and loss of productivity. Natural gas fired combined cycle 2x1 configuration with combustion turbine generators, HRSGs, steam turbine generator, step-up transformers, cooling tower, and site infrastructure. The total construction value was \$331 million.

Williamsburg Wastewater Treatment Plant, Hampton Roads, VA: As Senior Consultant, reviewed claims documents and project records and assisted in research and analysis of claimed design issues associated with the performance of sludge filtration systems, sludge handling, and incinerator were elevated. The project involved plant expansion to increase capacity from 10 million gallons per day (MGD) to 22.5 MGD. The total construction value was \$30 million.

Wolf Hollow Electric Power Generating Station, Granbury, TX: As Project Manager, performed claims analysis validating estimate to complete services on behalf of replacement EPC contractor completing a power generating station. The project consisted of a 730-megawatt gas-fired, combined cycle electric power generating station consisting of two combustion turbine generators, two HRSGs and a steam turbine generator, and the balance of plant facilities. Procured through the EPC delivery method. The total construction value was \$100 million.

Charles E. Bolyard, Jr. Presentations, Courses, and Panels 2020-1997

- ❖ “State of the Association”, ACEI Western Winter Workshop, Indian Wells, California, 2018
- ❖ Keynote “Importance of Professional Level Certifications and Licensure” and “ACEI International Certification Program”, Construction CPM Conference, New Orleans, Louisiana, 2018
- ❖ “Lean Approaches to Project Design and Delivery”, ACEI Edmonton Meeting, Edmonton, Canada, 2017
- ❖ “State of the Association”, ACEI Region 5 Symposium, Houston, Texas, 2017
- ❖ “Cost Benchmark Panel”, 2017 Regional Building Construction Conference, Silver Spring, Maryland, 2017
- ❖ “Quality Control Programs – Best Practices”, Chief Executive Network Meeting, Chicago, Illinois, 2017
- ❖ “Construction Cost Estimating”, Eisner Amper Training, Philadelphia, Pennsylvania, 2017
- ❖ “The Importance of Being Active in a Professional Association”, MBP Lunch-n-Learn, Fairfax, Virginia, 2016
- ❖ “The Battlefield Boulevard Reconstruction Project”, 35th Annual Construction and Public Contracts Law, Charlottesville, Virginia, 2014
- ❖ “Project Management”, The 15th Annual Reed Smith Construction Law Seminar, Falls Church, Virginia, 2014
- ❖ “Earned Value Analysis and CPM Schedule Review in Construction”, ACEI Annual Meeting, Washington D.C., 2013
- ❖ “Introduction of the ACEI to DAU”, Defense Acquisition University (DAU) Meeting, Ft. Belvoir, Virginia, 2011
- ❖ “Applying Risk Management to Project Performance Presentation”, ACEI NCS Meeting, Fairfax, Virginia, 2011
- ❖ “ACEI NCS Introduction to Students”, Virginia Tech Meeting, Blacksburg, Virginia, 2010
- ❖ “Hands-on Application of Qualitative Risk Management to Project Performance”, Construction Management Association of America National Conference, San Diego, California, 2010
- ❖ “Fundamentals of Construction Scheduling and Claims Avoidance”, NAVFAC Washington OICC, Bethesda, Maryland, 2009
- ❖ “Tricks, Traps and Ploys Used in Construction Scheduling”, Lorman Education Services, Fairfax, Arlington, Loudoun County, Virginia, 2009, 2008, 2007, and 2006
- ❖ “Society of American Military Engineers (SAME), Private Sector Organization Structure”, Transition Workshop and Job Fair, Atlanta, Georgia, 2008
- ❖ “Project Documentation Records Management Delay Analysis Overview”, West Virginia University College of Law, Morgantown, West Virginia, 2007, 2006, and 2005
- ❖ “Collaborative Construction Scheduling Eight Steps to Success”, Construction Superconference, San Francisco, California, 2007
- ❖ “Managing Construction Project Costs Optimizing Construction Value – Is a Cost Effective Project a Myth?”, Client Seminar, Atlanta, Georgia, 2006
- ❖ “Construction Delay Claims”, Lorman Education Services, Leesburg and Fairfax, Virginia, 2006
- ❖ “Successfully Managing Construction Project Risks and Now Exactly How Confident Are You That Your Design is Within Your Budget”, Atlanta, Georgia, 2005
- ❖ “Claims Management Services: The CM’s Role and Responsibilities”, Construction Management Association of America Conference and Leadership Forum, Denver, Colorado, 2005

- ❖ “New Approaches to Successfully Managing Your Construction Program”, Construction Cost Confidence - MBP In-house Training, Fairfax, Virginia, 2004
- ❖ “Fundamentals of CPM Scheduling”, Client Seminar, 2004
- ❖ “Blasting in Construction”, MBP In-house Training, Fairfax, Virginia, 2003
- ❖ “Project Documentation Records Management”, West Virginia University College of Law, Morgantown, West Virginia, 2002
- ❖ “How to Keep Clients Happy by Keeping Them Out of Court”, Construction Management Association of America National Conference, Chicago, Illinois, 2002
- ❖ “Keeping Owners Happy by Keeping Them Out of Court: 8 Strategies for Avoiding Litigation”, Construction Management Association of America National Conference, New Orleans, Louisiana, 2001
- ❖ “Construction Delay – Do’s and Don’ts of Management, Analysis and Proof”, Client Seminar, Research Triangle Park, North Carolina, 2001
- ❖ “Do’s and Don’ts of Management, Analysis and Proof – Construction Delay”, West Virginia University College of Law, Morgantown, West Virginia, 2004
- ❖ “A Construction Manager’s Point of View – The Commonwealth of Virginia: General Conditions of the Construction Contract (CO-7)”, Virginia Polytechnic Institute and State University, Blacksburg, Virginia
- ❖ “Project Records Management”, J&L Enterprises, 1997
- ❖ “CPM Scheduling in Construction and the Analysis of Delays”, Arlington County, Virginia, 1997

Charles E. Bolyard, Jr. Published Materials

- ❖ Co-Author, *Earned Value Analysis and CPM Schedule Review in Construction*, Cost Engineering, 2014
- ❖ Co-Author, *Retro-Commissioning: The Key to Sustainability in Existing Facilities*, American Public Works Association, 2013
- ❖ Co-Author, *Retro-Commissioning: The Key to Sustainability in Existing Federal Facilities*, Society for American Military Engineers, 2011

INDIVIDUALS	FOR	VERSUS	PROJECT	ISSUES	FORUM	ANALYSIS/TESTIMONY
C. Bolyard	Old Dominion Electric Cooperative	White Oak Power Constructors	Wildcat Point Generation Facility, MD	Delay, Disruption	United States District Court Eastern District of Virginia	Schedule delay, Loss of efficiency; Report filed; Settled
C. Bolyard	Redstone International, Inc., PA	J.F. Allen Company, WV	Mobley V Pile Wall, WV	Delay, Disruption, Damages	Circuit Court of Wetzel County, WV, Deposition Testimony	Delay, Disruption, Damages
C. Bolyard	Designer of Record	Owner/Developer	Polysilicon Manufacturing Facility, TN	Direct and Delay Damages Estimated Costs of Performance	American Arbitration Association Arbitration	Report filed; Settled
C. Bolyard	Bovis Lend Lease, Inc.	Evangelical Retirement Homes of Greater Chicago, IL	Bridgewater Place - Friendship Village, Schaumburg, IL	Construction Means and Methods and Costs of Repairs	American Arbitration Association, Deposition Testimony, Settled	<ul style="list-style-type: none"> Means and Methods Costs of Construction
C. Bolyard	John and Leslie Sayres	Fuog/Interbuild, Inc., VA	Sayres Utility Building, Loudoun County, VA	Construction Means and Methods, Costs of Construction, Schedule Delays	Circuit Court of Loudoun County, VA, Deposition Testimony, Settled mid-Trial	<ul style="list-style-type: none"> Means and Methods Costs of Construction Schedule Delays
C. Bolyard	Design Collective, Inc., MD	Whiting-Turner Contracting Company, MD	Pike & Rose Mid-Pike Plaza, Rockville, MD	Costs of Remedial Repairs to Brick Façade; Costs of Remedial Repairs to Interior GWB; Quality Control and Trade Coordination	Circuit Court for Montgomery County, MD; Deposition Testimony, Settled	<ul style="list-style-type: none"> Costs of Remedial Repairs to Brick Façade and Interior GWB Quality Control Trade Coordination
C. Bolyard	Atlanta Masonry, Inc., MD	Whiting-Turner Contracting Company, MD	Dundalk Readiness Center, Dundalk, MD	Costs of Repairs to and Completion of Masonry Work	Circuit Court of Baltimore County, MD, Mediation, Deposition and Trial Testimony	<ul style="list-style-type: none"> Reasonable Cost of Repairs and Completion
C. Bolyard	EPC Joint Venture Contractor	Refinery Owner	Port Arthur Refinery Crude Expansion Project, TX	Cost Estimates, Forecasts, and Changes Management	International Institute for Conflict Prevention and Resolution-Deposition; Hearing Testimony	<ul style="list-style-type: none"> Estimating Standard of Care Reasonableness of Cost Estimates Reasonableness of Cost Forecasts
C. Bolyard	CDM Smith, MA	Carbro, NJ	Somerset Raritan Valley Relocated Plant Outfall, NJ	Cost of Tunnel Work Scope Deletion	AAA Arbitration Single Arbitrator Settled in mid-Arbitration	<ul style="list-style-type: none"> Costs of Deletion of Tunnel and Dewatering
C. Bolyard	West Virginia Campus Housing, WV	Turner Construction Company, PA	University Place Student Housing, Morgantown, WV	Negative Allowances Reconciliation; Costs of Construction	American Arbitration Association, Arbitration Testimony	<ul style="list-style-type: none"> Construction Management Cost Estimating Cost Management
C. Bolyard	PSA Dewberry, Inc. & Professional Liability Insurer	Hamaker Court, LLC, VA	Hamaker Court Medical Office Building, Fairfax, VA	CM Standard of Care; Changes Standard of Care; Costs of the Work	Circuit Court of Fairfax County, VA; Bench Hearing, Settled mid-Hearing	<ul style="list-style-type: none"> Cost Estimating Changes Management Standard of Care CM Standard of Care
C. Bolyard	EPC Contractor and Process Equipment Manufacturer	Electric Power Utility Owner	IGCC Powerstation, IN	Project Estimate and Changes Management	International Institute for Conflict Prevention and Resolution-Deposition; Hearing Testimony	<ul style="list-style-type: none"> Estimating Standard of Care Changes Management Standard of Care
C. Bolyard	M.C. Industrial, MO	Westar	Jeffrey Energy Center Outage Duct Replacement Operating Power Station, St. Mary's, KS	Estimate Validation, Cost of Construction, Delay, Impacts, and Acceleration	AAA Arbitration, Mediation	<ul style="list-style-type: none"> Estimate Validation Costs/Damages Labor Loss of Efficiency Delays
C. Bolyard	Flintco, LLC, f/k/a Flintco, Inc.	Buzzi Unicem Ready Mix, LLC, d/b/a Memphis Ready Mix	Memphis International Airport Parking Garage Expansion and Improvements Projects, aka Consolidated Ground Transportation Center	Delays and Impacts	U.S. District Court, Western District of Tennessee, Western Division, Memphis, Tennessee; Deposition Testimony	<ul style="list-style-type: none"> Construction Performance Delays Impacts
C. Bolyard	Heery-Mitchell, J.V., GA	DeKalb County School District, GA	SPLOST I & II Construction Program Management	Opposing Expert Damages Methodology	Circuit Court for DeKalb County, GA, Daubert Hearing	<ul style="list-style-type: none"> Opposing Expert Damages Methodology CM Standard of Care
C. Bolyard	Canam Steel Corporation	Tully Construction Company/A.J. Pegno Construction Company, J.V.	Whitstone Expressway Rehabilitation Queens, New York	Delay, Damages	AAA Arbitration, Arbitration Testimony	<ul style="list-style-type: none"> Delay Damages

INDIVIDUALS	FOR	VERSUS	PROJECT	ISSUES	FORUM	ANALYSIS/TESTIMONY
C. Bolyard	Heery-Mitchell, J.V.	DeKalb County School District, GA	SPLOST I & II Construction Program Management	Damages Rebuttal	Circuit Court for DeKalb County, GA, Deposition Testimony	• Damages Rebuttal
C. Bolyard	Fluor Intercontinental, Inc., SC	U.S. Department of State, OBO, Washington, DC	U.S. Embassy Port Au Prince, Haiti	Delay and Acceleration	United States Civilian Board of Contract Appeals; Deposition, Trial Testimony	• Schedule • Delay • Acceleration
C. Bolyard	The Fidelity and Deposit Company of MD	First Baptist Church of Guilford, MD	First Baptist Church of Guilford	Estimated Cost to Complete construction	Circuit Court for Howard County, MD, Deposition, Trial Testimony	• Estimated Cost to Complete Construction
C. Bolyard	Fluor Intercontinental, Inc., SC	U.S. Department of State, OBO, Washington, DC	U.S. Embassy Astana, Kazakhstan	Delay, Acceleration, Costs of Acceleration	United States Civilian Board of Contract Appeals; Deposition, Trial Testimony	• Schedule • Delay • Acceleration • Discrete Damages
C. Bolyard	Wellsboro Area School District, PA	G.M. McCrossin, Inc., PA	Wellsboro High School, PA	Delay, Labor Inefficiency, Liquidated Damages	Commonwealth of Pennsylvania, County of Tioga, Court of Common Pleas, Jury Trial Testimony	• Schedule Delays • Liquidated Damages
C. Bolyard	Tompkins Builders Inc.	USACOE & USAF	Langley AFB Hospital Expansion & Renovation, VA	Work Scope Disputes, Costs of Changed Work, Schedule Impacts and Delays	Negotiated Resolution	• Third Party Neutral
C. Bolyard	DMJM, VA	Baltimore County, MD	Baltimore County Detention Center Expansion, MD	Schedule Delay	Circuit Court for Baltimore County, MD, Deposition, Jury Trial Testimony	• Schedule Delay
C. Bolyard	Fluor Intercontinental, Inc., SC	U.S. Department of State, OBO, Washington, DC	U.S. Embassy Kingston, Jamaica	Delay, Acceleration, Costs of Performance	United States Civilian Board of Contract Appeals; Deposition Testimony	• Delay • Discrete Damages
C. Bolyard	Cross County Collaborative Joint Venture, MO	Bi-County Development Agency (Metro), St. Louis, MO	St. Louis Light Rail Cross County Extension, MO	Schedule Delay, Damages	Circuit Court of the County of St. Louis, State of Missouri, Deposition, Jury Trial Testimony	• Schedule Delay • Damages
C. Bolyard	Turner Construction	Bryant Durham Electric Company, Inc., NC	VA. Beach Convention Center, VA	Schedule Delay, Disruption Damages	Mediation	• Schedule Delay • Impacts • Damages
C. Bolyard	Goochland County, VA	Bryant Durham Electric Company, Inc., NC	Goochland/Henrico Force Main, VA	Schedule Delay, Damages	United States District Court, Eastern District, Richmond Division, Deposition Testimony	• Schedule Delay • Damages
C. Bolyard	Metropolitan Washington Airports Authority (MWAA)	San Jose Construction Group and ACSTAR Insurance Company	Dulles International Airport, East T-Gates Phase I (Z-Gates), VA	Cost of Completion and Liquidated Damages	American Arbitration Association, Hearing Testimony	• Cost of completion • Liquidated Damages
C. Bolyard	Brookside Development, VA	Fauquier County Water and Sanitation Authority, VA	Vint Hill Farms Wastewater Treatment Plant Upgrade and Expansion, VA	Schedule Delay, Costs of Construction	Circuit Court of Fauquier County, VA, Expert Report	• Schedule delays and costs; settled
C. Bolyard	Perkins-Eastman Architects	Hebrew Home of Greater Washington	Landow House Assisted Living, Washington, DC	Delay	American Arbitration Association, Hearing Testimony	• CPM Schedule Delay Analysis
C. Bolyard	Walton Companies and Tompkins-Grunley, JV	Tompkins Builders	1150 K Street Building, Washington, DC	Design, Schedule Delay, Quality, Damages	Mediation	• Mediator
C. Bolyard	Stone & Webster, Inc.	AES Wolf Hollow, TX and Parsons Energy and Chemical Group, Inc.	Wolf Hollow Power Station, Granbury, TX	Reasonableness of the Cost Estimate	District Court Hood County, TX 355th Judicial District, Deposition Testimony	• Reasonableness of Cost Estimate, Settled
C. Bolyard	Noell, Inc. and Fru-Con Corporation	U.S. Army Corps of Engineers	R.C. Byrd Dam, WV	Reasonableness of Expert Fees	Armed Services Board of Contract Appeals, Alexandria, VA, Hearing Testimony	• Reasonableness of Expert Fees

INDIVIDUALS	FOR	VERSUS	PROJECT	ISSUES	FORUM	ANALYSIS/TESTIMONY
C. Bolyard	AF Construction Company	Clark County, Nevada	Clark County Detention Center Expansion, NV	Project Administration	AAA Arbitration, Deposition	<ul style="list-style-type: none"> • General Contractor Project Administration
C. Bolyard	Duke-Fluor Daniel, JV	AES, Puerto Rico	Guayama Coal Fired Power Station, Puerto Rico	Delays, Targets, Impacts, and Equipment Design/Delay	AAA Arbitration, Mediation	<ul style="list-style-type: none"> • Estimate Validation • Analysis of Targets/Actual Performance • Labor Loss of Efficiency • Costs of performance
C. Bolyard	Department of General Services, PA	Lighthouse Electric, Kirby Electric, McGregor Industries	Forest State Correctional Institution, PA	Schedule Delay, Construction Management	Pennsylvania Board of Claims, Trial Testimony	<ul style="list-style-type: none"> • CM Standard of Care • CPM Schedule Delay Analysis
C. Bolyard	Blake/Poole & Kent, J.V.	Upper Occoquan Sewage Authority, VA	Contract 54 Plant Expansion Centreville, VA	Construction Value	Fairfax County Circuit Court, Virginia, Deposition, Trial Testimony	<ul style="list-style-type: none"> • Construction Value
C. Bolyard	U.S. Army Corps of Engineers	Sunshine Construction and Engineering	Education Center and Library, MacDill AFB, FL	Schedule Delay, Costs, Damages	United States Court of Federal Claims, Tampa, Florida, Deposition, Trial Testimony	<ul style="list-style-type: none"> • Schedule Delay • Costs • Damages
C. Bolyard	RCD, Inc.	HRGM Corporation	Sully District Police Station, Fairfax County, Virginia	Delay, Costs, Damages	Fairfax County Circuit Court, Virginia, Deposition Testimony	<ul style="list-style-type: none"> • Delay • Costs • Damages
C. Bolyard	COXCOM, Inc.	North Central Service, Inc.	Cable TV Network System Rebuild and Upgrade, Washington County, NC	Schedule Delay, Damages	American Arbitration Association, Deposition, Arbitration Testimony	<ul style="list-style-type: none"> • Schedule Delay • Damages
C. Bolyard	Hamel Commercial, Inc.	Groveton 340 Associates	Groveton Apartments Renovation, VA	Delay, Coordination, Labor Inefficiency, Cost	U.S. District Court for the Eastern District of VA, Alexandria Division, Deposition Testimony	<ul style="list-style-type: none"> • Labor Inefficiency • Cost
C. Bolyard	Rand Construction Corporation	Fish & Richardson, Washington, DC	1425 K Street, NW, Washington, DC	Delay, Coordination, Impact and Cost	American Arbitration Association, Deposition Testimony, Settled	<ul style="list-style-type: none"> • Delay • Construction Coordination • Impact • Cost
C. Bolyard	Park Center III, LTD, VA	Pennsylvania Manufacturers Association Insurance Company	Park Center III Apartments, Alexandria, VA	Damage and Delay from Hurricane	U.S. District Court, Eastern District, Alexandria, VA Rocket Docket Deposition and Trial Testimony	<ul style="list-style-type: none"> • Cost Evaluation • Delay Evaluation
C. Bolyard	Kaiser Aluminum and Chemical Corporation, LA	Thomas & Betts Corporation; Power Control Systems, Inc. et al	Gramercy Plant Digester Rebuild, Louisiana	Cost of Rebuild - Estimated and Actual	Twenty Third Judicial District, Parish of St. James, State of Louisiana, Deposition and Jury Trial Testimony	<ul style="list-style-type: none"> • Estimated and Actual Construction Cost Analysis • Cost of Completion • Cost of Owner Enhancements
C. Bolyard	CNA Insurance, Hazen & Sawyer and City of Greensboro, NC	MCI Constructors, VA	T.Z. Osborne WWTP, Greensboro, NC	Costs, Standard of Care, Termination	United States District Court, Middle District of North Carolina, Greensboro Division, Deposition Testimony	<ul style="list-style-type: none"> • Standard of Care • Termination • Costs • Project Administration
C. Bolyard	U.S. Department of Veteran's Affairs, FL	David Boland, Inc., NY	James A. Haley Veteran's Hospital Center Expansion, Tampa, FL	Default Termination	Veteran's Affairs Board of Contract Appeals, Deposition, Trial Testimony	<ul style="list-style-type: none"> • Delay Impacts • Termination Default
C. Bolyard	Morganti National, Inc.	Federal Bureau of Prisons	Federal Metropolitan Detention Center, Brooklyn, NY	Design Changes and Defects, Trade Coordination, Default Termination	U.S. Court of Federal Claims, Washington, DC Deposition, Trial Testimony	<ul style="list-style-type: none"> • Delays • Impacts/Inefficiencies • Trade Coordination
C. Bolyard	G.F. Atkinson	Omega JV5	Belleville Hydroelectric Power Plant, WV	Delays, Acceleration, Impacts, Labor Inefficiency	U.S. Court, Eastern District, Huntington, WV, Deposition Testimony	<ul style="list-style-type: none"> • Delay Analysis • Cost Analysis • Acceleration

INDIVIDUALS	FOR	VERSUS	PROJECT	ISSUES	FORUM	ANALYSIS/TESTIMONY
C. Bolyard	Moses H. Cone Memorial Hospital, Greensboro, N.C.	Centex-Simpson Construction Co., Inc.	East Wing Addition and Renovation	Delays and Damages	AAA Arbitration Greensboro, NC, Hearing Testimony	<ul style="list-style-type: none"> • CPM Scheduling • Damages Analysis
C. Bolyard	W. G. Tomko & Sons, PA	Jefferson County, OH; The V Companies; and Mascaro, Inc.	Jefferson County Justice Facility, Steubenville, OH	Delay and Impacts	United States District Court, Southern District of Ohio, Eastern Division Deposition, Jury Trial Testimony	<ul style="list-style-type: none"> • CPM Schedule Delay • Impacts
C. Bolyard	Durham Hospital Corporation, N.C.	Nello L. Teer and Bryant-Durham Electric	Durham Regional Hospital Additions and Renovations	Delays and Damages	American Arbitration Association - Hearing Testimony, Durham, NC	<ul style="list-style-type: none"> • Delays • Damages Analysis
C. Bolyard	Durham County Hospital Corporation, NC	Colonial Mechanical Corporation	Durham Regional Hospital, Durham, NC	Changes, Inefficiency, Delay	American Arbitration Association - Hearing Testimony, Durham, NC	<ul style="list-style-type: none"> • CPM Scheduling • Loss of Efficiency • Damages Analysis
C. Bolyard	Washington Suburban Sanitary Commission, MD	Humphrey & Son, Inc., MD	Jacked Pipe Tunnel	Delay & Impact, Defective Design	Mediation	<ul style="list-style-type: none"> • Mediator
C. Bolyard	O'Brien/Atkins Associates, P.A. and Thai Associates, Research Triangle Park, N.C.	RPR Construction	G. Watts Hill Alumni Center, Chapel Hill, NC	Delays and Damages	Federal District Court Middle District, Winston-Salem, NC Deposition Testimony	<ul style="list-style-type: none"> • CPM Scheduling • Delays
C. Bolyard	Washington Metropolitan Area Transit Authority (WMATA)	Green International, Inc./Seaboard Surety	Prince George's. Plaza Station & Line, MD	Delays and Impacts	Corps of Engineers Board of Contract Appeals, Deposition, Trial Testimony	<ul style="list-style-type: none"> • Claims Analysis • CPM Scheduling • Cost Analysis
C. Bolyard	Slattery Associates	Morrison Knudsen Company	Schuykill Expressway Section 400 Philadelphia, PA	Delays Impacts Differing Site Conditions	U.S. District Court Brooklyn, NY, Deposition, Trial Testimony	<ul style="list-style-type: none"> • Claims Analysis • CPM Scheduling • Costs Productivity
C. Bolyard	Hazen & Sawyer and City of Raleigh, N.C.	Trico Electric and Danis Industries, NC	Neuse River Waste Water Treatment Plant Phase III, Raleigh, NC	Delay, Impacts and Inefficiencies	District Court Wake County, NC, Deposition Testimony	<ul style="list-style-type: none"> • CPM Scheduling • Damages Analysis • Loss of Efficiency
C. Bolyard	CONOCO, TX	LA Pipeline, OH	Cardinal States Gathering Line, WV, KY, VA	Design, Delay, Impacts	U.S. District Court Charleston, WV, Deposition Testimony	<ul style="list-style-type: none"> • Costs Analysis • CPM Scheduling • Delays
C. Bolyard	City of Memphis Housing Authority, Tennessee	Construction Technologies, Inc.	Dixie Homes Rehabilitation, TN	Design, Delay	District Court for Tennessee, Shelby County, Deposition, Trial Testimony	<ul style="list-style-type: none"> • Schedule • Bid and Cost Analysis
C. Bolyard	Virginia Department of Transportation	W. C. English, Inc.	I-95 Widening, Caroline County, VA	Delay & Impact	Deposition Testimony	<ul style="list-style-type: none"> • CPM Scheduling • Construction Performance • Delays • Bid & Cost Analysis
C. Bolyard	Washington Suburban Sanitary Commission, MD	W. M. Schlosser Co., Inc.	Western Branch Wastewater Treatment Plant, MD	Construction Methodology and Performance	American Arbitration Association (AAA), Hearing Testimony	<ul style="list-style-type: none"> • Construction Methodology • Cost Analysis • Construction Performance
C. Bolyard	Anjo Construction	Allegheny County, PA	Greater Pittsburgh International Airport Midfield Terminal	Design, Delays, Impact	Mediation	<ul style="list-style-type: none"> • Claims Analysis • CPM Scheduling • Defective Design
C. Bolyard	Brinderson Corp., CA & City of Newport News, VA	3rd Party Evaluation & Mediation	Harwood's Mill Water Treatment Plant, Newport News, VA	Changes, Delays, Differing site conditions	Mediation	<ul style="list-style-type: none"> • Claim Analysis • Delays • CPM Scheduling • Impacts & Changes
C. Bolyard	Pennsylvania Department of Transportation, Harrisburg, PA	MK-Slattery, Joint Venture	Schuykill Expressway, Section 400, Philadelphia, PA	Delay, Impacts, Multiplicity of Changes	Mini-Trial	<ul style="list-style-type: none"> • Claim Analysis • CPM Schedule • Delays • Impact of Changes • Bid & Cost Analysis

INDIVIDUALS	FOR	VERSUS	PROJECT	ISSUES	FORUM	ANALYSIS/TESTIMONY
C. Bolyard	U.S. Army Corps of Engineers-Omaha District	Bechtel National, Inc.	CSOC Complex, Colorado Springs, CO	Delay, Impact & Inefficiency	USACE Mini-Trial	<ul style="list-style-type: none"> • CPM Scheduling • Construction Performance • Delays • Bid & Cost Analysis
C. Bolyard	Fruin-Colnon Contracting	RAM Construction	Wood St. Station and Line, Pittsburgh, PA	Breach of Contract	Federal Bankruptcy Court, Pittsburgh, PA Trial Testimony as fact witness	<ul style="list-style-type: none"> • Construction Performance • Delays • Bid & Cost Analysis
C. Bolyard	Washington Metropolitan Area Transit Authority, Washington, DC	Square-Laferra, JV, NJ	Pentagon City Station and Line, VA	Wrongful Termination for Default	Corps of Engineers Board of Contract Appeals, Washington, DC, Trial Testimony as fact witness	<ul style="list-style-type: none"> • Non-conforming work • Schedule delays • Costs of reprocurement contract modifications • Costs of rework and completion

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Exhibit CEB-2

List of Documents Reviewed

Exhibit CEB-2**DOCUMENTS REVIEWED BY MBP**

- Williams Solar – NCUC Complaint
- Duke Answer and Motion to Dismiss
- Williams Solar Reply to Answer and Motion to Dismiss
- DEP Supplemental Responses to Williams Solar First Requests
- CONFIDENTIAL DEP Final Accounting Report Tracker Q3 2018
- CONFIDENTIAL DR No. 1-17 Williams Solar
- CONFIDENTIAL Project 15007 System Impact Study Calculations - Project A and B 2017 (002)
- CONFIDENTIAL Project 15007 System Impact Study Calculations with A
- CONFIDENTIAL_DEP_Protection_V2.4.2
- DEP Response to Williams Solar Data Request 1
- DR No. 1-3 Revised Estimating Tool Description - Williams Solar
- Reconductoring Work Order Example
- SIS Estimation Tool Rev0
- SIS Estimation Tool Rev1
- System Impact Study SOP
- Williams Solar Estimation Tool SIS
- Williams System Impact Study Report with A
- SIS Estimation Tool Rev0.1
- BLANK IPP MFC Request 4.0 with Admin Costs Formulas
- Copy of Time and Expense Estimate Template
- DET Time and Expense Estimate Tool - v2
- DET Time and Expense Estimate Tool - v3
- DET Time and Expense Estimate Tool - v4
- Time and Expense Estimate Template
- Time and Expense Estimate - CONFIDENTIAL SOLAR FACILITY
- DET Time and Expense Estimate Tool

- CONFIDENTIAL Amendment to Alliance Agreement and 2020 Scope Mastec signed
- CONFIDENTIAL Amendment to Alliance Agreement and 2020 Scope Pike signed
- CONFIDENTIAL Amendment to Alliance Agreement and 2020 Scope Sumter signed
- CONFIDENTIAL Amendment to Alliance Agreement and 2020 Scope ULCS signed.
- CONFIDENTIAL Att C MSA 7004 Amendment No.1 ULCS.
- CONFIDENTIAL Att C MSA 7017 Sumter
- CONFIDENTIAL Att C MSA 7095 Amendment No.1 Mastec
- CONFIDENTIAL Att D MSA 7000 Amendment No.2 Pike
- CONFIDENTIAL Att E MSA 7000 Pike
- Cost Estimation Tool - Revised – Copy
- Cost Estimation Tool Presentation
- FW REDACTED (Part 2 of 3)
- RE_ DEP and DEC exposure
- RE_ slider solar onsite and offsite work order CUE
- DEP Supplemental Response to Williams RFPD No. 10
- DEP Supplemental Responses to Williams Solar First Requests
- DR No. 1-22 and 1-23 Maximo Labor Rates_Historical
- Williams Solar Estimation Tool SIS
- 15007 Williams Solar, LLC_Solar-Revised SLD
- Facility Study Report Williams Solar LLC CHKLIST
- Interconnection Request Williams Solar LLC CHKLIST 15007
- 181113-2309_2250-024_SLD sized resistor_Stamped 2
- DEP Official Release System Impact Study NC2016 02927 Williams Solar LLC
- 181113-2309_2250-024_SLD sized resistor_Stamped 2
- True up labor calculation

- AACE International Recommended Practice 96R-18 Cost Estimate Classification System – As Applied in Engineering, Procurement, and Construction for the Power Transmission Line Infrastructure Industries
- Re: Facility Study Report Williams Solar LLC CHKLIST.msg e-mail string July 30, 2019 through August 16, 2019
- Re: Tier 3 Projects e-mail string July 19, 2019 through July 26, 2019
- FW: Cost Estimating Training e-mail string July 30, 2019 through February 14, 2020
- Cost Estimation Tool Start Date and Consistency Issues e-mail string July 31, 2019 through August 8, 2019
- Conference Line for Cost Estimating Training e-mail dated August 1, 2019
- Interconnection Procedures

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Exhibit CEB-3

Initial Estimate (E-mail from DEP to Williams Solar dated January 28, 2019, transmitting System Impact Study Report)

To: Flagstad, Frederik -greengoenergy[frederik@greengoenergy.com]; Carl Siebing (cs@greengoenergy.com)[cs@greengoenergy.com]; Interconnection US (interconnection@greengoenergy.com)[interconnection@greengoenergy.com]
Cc: DERContracts[DERContracts@duke-energy.com]
From: Winter, Lee P
Sent: Mon 1/28/2019 11:07:13 AM (UTC-05:00)
Subject: Interconnection Request Williams Solar, LLC CHKLIST 15007
[Williams System Impact Study Report with A.pdf](#)
[Facility Study Agreement.pdf](#)
[Request for Information.docx](#)

The results of the System Impact Study Report for the interconnection costs which do not account for the terrain that DEP personnel will encounter to connect your renewable generation project to the DEP grid. Please be advised that these preliminary costs are based on a grid program, that is used to evaluate the connection to the grid. To that end, these are the baseline costs to connect the facility to the grid based on the proposed route by DEP that should be most cost effective and more easily to secure right-of-way for the project. Please note the project owner will have the option to choose the route of the infrastructure and point-of-delivery (POD) knowing that costs can potentially increase. The purpose of this email is for a decision to be made whether or not to continue moving forward with the project for the final costs or to withdraw.

If you desire to move forward with the project please complete ALL fields of the attached document(s) and return to me. You must complete and return the form(s) to be received within sixty (60) calendar days from the date of this email or your project will be deemed withdrawn.

At this current stage your options are:

- o Continue with the interconnection process by completing and returning the attached documents to be received within sixty (60) calendar days from the date of this email – March 29, 2019; or you can
- o Withdraw by replying to this email

SYSTEM UPGRADES Assuming NC2016-02927 – Williams Solar, LLC Commits to Installing (Budgetary One Time System Upgrade estimate of \$774,000)

As a result of a completed feeder study, the following work scope must be designed and cost-estimated (on its own work order) separately:

1. Reconductoring as follows:
 - a. Replace existing 1 - # 2 ACSR circuit with 3-477 AAC circuit from DIS# 2M843 to DIS# 2M845 (approximately 0.0775 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
 - b. Replace existing 1 - #4 BC circuit with 3-477 AAC circuit from DIS# 2M803 to DIS# 2M843 (approximately 1.342 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
 - c. Replace existing 3 - #2 ACSR circuit with 3-477 AAC circuit from DIS# 2L653 to DIS# 2M803 (approximately 1.114 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
2. Sectionalizing/protection changes as follows:
 - a. Remove 25 A Fuse at DIS# 2M803.
 - b. Install 3 x 50 A Fuses at DIS# 2M803.
 - c. Relocate the Hydraulic Recloser at DIS# 2KU54 to 2M725.
 - d. Install a G&W recloser at DIS# 2M725.
 - e. Install 1 x 25 A Fuses at DIS# 2M845.
 - f. Install 3 x 25 A Fuses at DIS# 2M840.
 - g. Install 1 x 25 A Fuses at DIS# 2M827.
 - h. Install 1 x 25 A Fuses at DIS# 2M819.
 - i. Install 1 x 25 A Fuses at DIS# 2M813.
 - j. Install 71 high fault tamer fuses.

1Ø - 2KJ54	1Ø - 2KW94	1Ø - 2KU91	1Ø - 2M885	1Ø - 2M830	1Ø - 2M813	1Ø - 6BY83
1Ø - 2KJ50	1Ø - 2KW93	1Ø - 2KU89	1Ø - 2M823	1Ø - 9NJ16	1Ø - 2M808	1Ø - 7HA89
1Ø - 2KJ49	1Ø - 2NA05	1Ø - 2KU86	1Ø - 2M822	1Ø - 2M827	1Ø - 2M790	1Ø - 7EQ45
1Ø - 2KJ43	1Ø - 2NA02	1Ø - 15LF06	1Ø - 149A06	1Ø - 6LT98	1Ø - 10AJ02	1Ø - 2L823
1Ø - 2KJ47	1Ø - 2KW98	1Ø - 2KU83	1Ø - 2M841	1Ø - 2M824	1Ø - 2M788	1Ø - 2L759
1Ø - 2KJ42	1Ø - 2KW96	1Ø - 2M903	1Ø - 8NJ03	1Ø - 2M819	1Ø - 2Q991	1Ø - 14DR68

1Ø - 2KG19	1Ø - 2NA16	1Ø - 2M901	1Ø - 8NJ04	1Ø - 2M816	1Ø - 2M793	1Ø - 104E58
1Ø - 2KG24	1Ø - 2NA13	1Ø - 2M898	1Ø - 2M837	1Ø - 6QA58	1Ø - 2M791	1Ø - 2N380
1Ø - 2L971	1Ø - 2KU98	1Ø - 2M897	1Ø - 2M835	1Ø - 15D739	1Ø - 2M782	1Ø - 2L755
1Ø - 2L968	1Ø - 2KU94	1Ø - 2M890	1Ø - 2M831	1Ø - 6QA55	1Ø - 2M780	1Ø - 2L753
1Ø - 2KJ58						

3. Other changes as follows:

- a. Verify that the substation regulator is set to either Ignore Mode or Co-Generation Mode (based on the control type).

There could be as much as 9.292 MW shipped back into the substation during low load periods from the Newton Grove 23 kV feeder.

Interconnection Facilities (Budgetary Interconnection Facilities estimate \$60,000)

Interconnection Pole will be 2M845. (35.278505, -78.367579)

Install a maximum of 2 spans of 3 - #477 AAC primary and #1/0 AAAC neutral tap from Pole 2M845 to POD. Deviation from this recommendation requires the approval of the local PQR&I representative or the local Distribution Capacity Planner.

POD per Figure 71B (overhead).

Install G&W recloser one pole to Duke Energy Progress side of POD.

Install Power Quality (PQ) Meter per Figure 71B

“NOTE: The generating facility is to be operated such that unity power factor is continuously maintained at the Point of Delivery (where utility-owned metering is located).”

Please direct other technical questions to DEPCustomerOwnedGeneration@duke-energy.com.

Lee Winter

Wholesale Renewable Manager

Distributed Energy Technology



919-546-2207

919-219-7445 (mobile)

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Docket No. E-2, Sub 1220

Exhibit CEB-4

System Impact Study Report
dated December 20, 2018



Williams Solar, LLC

NC2016-02927

**Proposed Generating Facility
System Impact Study Report
Duke Energy Progress (DEP)**

December 20, 2018

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Preface

The System Impact Study is designed to identify and detail the electric system impacts associated with interconnecting the proposed Generation Facility and to identify System Upgrades and Interconnections Facilities needed to interconnect the facility and correct any system problems identified in the study. The study is based on the point of interconnection proposed by the Interconnection Customer and on technical information provided in the Interconnection Request. In addition to detailing the required Interconnection Facilities and System Upgrades, the study provides a preliminary, non-binding estimate of the cost and length of time necessary to provide the facilities and upgrades.

Interconnection Data

Interconnection Customer: Williams Solar, LLC

Queue Number: NC2016-02927

Maximum Physical Export Capability Requested: 4,992 kW

Generating Facility Equipment:

- PV Panels: First Solar FS-4120A-3 – Quantity 56,160
 - o 120 Watt Panels
- Inverters: Fronius Symo 24.0-3 480 – Quantity 208
 - o UL1741 Compliant
 - o Rated Output Power of 24 kW
 - o Nominal Apparent Power of 24 kVA
 - o Operating Voltage: 480 V
- Transformers: 1,700 kVA – Quantity 3
 - o Manufacturer: Not provided
 - o Primary (Utility) Winding: 22.86 kV Wye-grounded
 - o Secondary (Inverter) Winding: 480 V Wye-grounded
 - o 5.75% Impedance

Circuit Information

Substation Name: Newton Grove 230 kV

Feeder Number: Newton Grove 23 kV

Point of Interconnection (POI): 35.278505, -78.367579

Nominal Voltage: 22.86 kV

Existing/Proposed Generating Facilities Ahead On Feeder:

Queue Number	Size of Generating Facility (kW)
IC13-138	1,980
NC2016-02911	5,000

Existing/Proposed Generating Facilities Ahead On Substation:

Queue Number	Size of Generating Facility (kW)
IC13-017	4,872
IC13-138	1,980
NC2016-02911	5,000

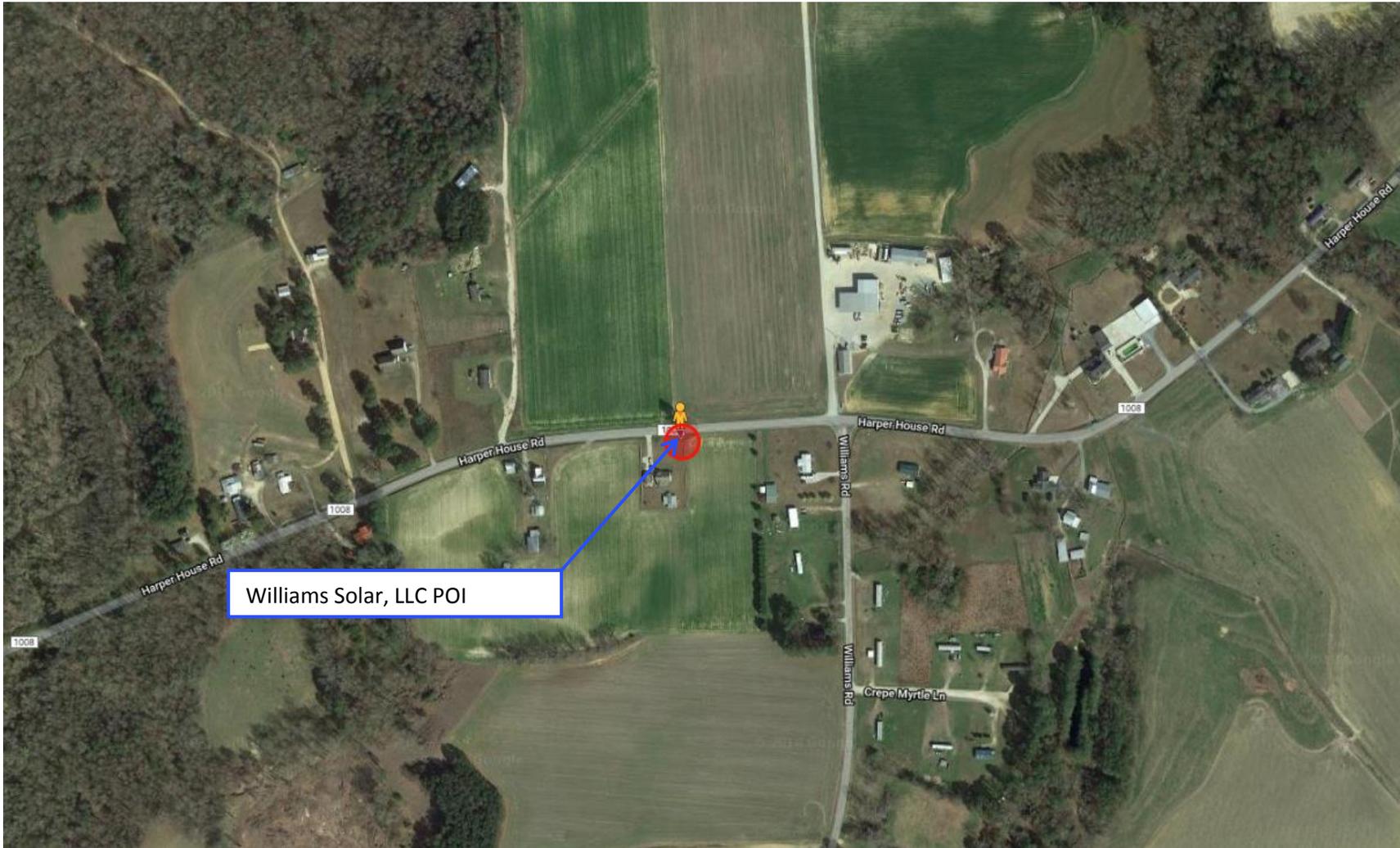


Figure 1 - Point Of Interconnection

Distributed Energy Resource Planning & Interconnection Guidelines

The Generating Facility was reviewed in conjunction with the DEC & DEP: Distributed Energy Resource (DER) Method Of Service Guidelines for DER No Larger Than 20 MW (“Guidelines”) to determine the applicable path for interconnection. A link to the Guidelines is provided below.

<https://www.duke-energy.com/business/products/renewables/generate-your-own>

As determined by the design of the Generating Facility and the Maximum Physical Export Capability Requested on the Interconnection Request, the Interconnection Customer will interconnect to the DEP system as Method “D”, as defined in Section 2.2 of the Guidelines.

The Interconnection Customer’s POI is within the first regulated zone of the DEP distribution system. As such, no new line extensions were required in order to accommodate the Interconnection Customer. As such, the POI for this installation will be at the end of the interconnection facilities. The interconnection facilities will be located on the Interconnection Customer’s property.

The short circuit capability at the POI is 98.4 MVA. The short circuit capability at the substation bus is 152.1 MVA. Generating Facilities currently exist ahead of the Interconnection Customer in the queue, totaling 11.852 MW. This equates to the Interconnection Customer having a Stiffness Factor of 19.7 and 9.0 at the POI and substation bus, respectively. The Interconnection Customer fails the POI Stiffness Factor and the Substation Stiffness Factor, as defined in Section 3.4 of the Guidelines.

The Generating Facility consists of a large amount of transformer capacity that needs to be energized by the DEP distribution system. In order to address the potential impacts to system safety, reliability and power quality, a study to determine the transient impacts of transformer energization was required. This analysis addressed the potential risk of excessive harmonics and rapid voltage change seen on the distribution system caused by energizing the Generating Facility’s transformers. The results of which are detailed in a later section.

Transformer Inrush Study

A study was performed to investigate transient impacts of transformer energization. To remediate issues identified within the study, the Generating Facility will utilize a 150 Ohm pre-insertion resistor. There were no further changes required to the Generating Facility's design.

Circuit Breaker Short Circuit Capability Limits

The POI is electrically downstream of non-electronic protective devices (i.e. fuses, or hydraulic reclosers). The protective scheme of the circuit needed to be altered such that only electronic devices exist upstream of the Interconnection Customer's POI while maintaining the reliability for DEP retail customers. These alterations include, but are not limited to, replacing devices with electronic reclosers and installing/relocating devices. A detailed listing of the System Upgrades that satisfied these requirements can be found in the Results Section below. The Interconnection Customer will be responsible for these System Upgrades.

The addition of the Generating Facility causes service transformers to be added to the high fault area. Service transformers within this area are retrofitted with current limiting fuses to minimize the chance of tank ruptures. In order to remediate these issues, the Interconnection Customer will be responsible for retrofitting the following transformers to incorporate current limiting fuses, also known as High Fault Tamers.

Transformer ID	Phase	LLL (A)	LLG (A)	LL (A)	LG (A)
2KJ58	1Ø	0	0	0	1904
2KJ54	1Ø	0	0	0	1949
2KJ43	1Ø	0	0	0	2029
2KJ47	1Ø	0	0	0	1970
2KG19	1Ø	0	0	0	1965
2KG28	1Ø	0	0	0	1901
2KG24	1Ø	0	0	0	1993
2L972	1Ø	0	0	0	1907
2L971	1Ø	0	0	0	1929
2L968	1Ø	0	0	0	1971
2KW94	1Ø	0	0	0	2023
2NA08	1Ø	0	0	0	1915
2NA05	1Ø	0	0	0	1949
2NA02	1Ø	0	0	0	1977
2KW98	1Ø	0	0	0	2016
2NA16	1Ø	0	0	0	1986
2NA13	1Ø	0	0	0	2007
2KU98	1Ø	0	0	0	1930
2KU94	1Ø	0	0	0	1951
2KU91	1Ø	0	0	0	1974
2KU89	1Ø	0	0	0	1993
2KU86	1Ø	0	0	0	2018
15LF06	1Ø	0	0	0	2091
2KU83	1Ø	0	0	0	2114
2M903	1Ø	0	0	0	1927
2M901	1Ø	0	0	0	1955

2M898	1∅	0	0	0	1998
2M897	1∅	0	0	0	1994
2M890	1∅	0	0	0	2202
2M823	1∅	0	0	0	2103
2M822	1∅	0	0	0	2132
2M843	1∅	0	0	0	1917
149A06	1∅	0	0	0	1935
2M841	1∅	0	0	0	1944
8NJ03	1∅	0	0	0	1942
8NJ04	1∅	0	0	0	1926
2M837	1∅	0	0	0	1990
2M835	1∅	0	0	0	2017
2M831	1∅	0	0	0	2046
2M830	1∅	0	0	0	2067
9NJ16	1∅	0	0	0	2059
2M827	1∅	0	0	0	2089
6LT98	1∅	0	0	0	2100
2M824	1∅	0	0	0	2138
2M819	1∅	0	0	0	2171
2M816	1∅	0	0	0	2237
6QA58	1∅	0	0	0	2179
15D739	1∅	0	0	0	2187
6QA55	1∅	0	0	0	2241
2M813	1∅	0	0	0	2283
2M808	1∅	0	0	0	2331
2M790	1∅	0	0	0	2077
10AJ02	1∅	0	0	0	2097
2M788	1∅	0	0	0	2124
2Q991	1∅	0	0	0	1931
2M793	1∅	0	0	0	1989
2M791	1∅	0	0	0	2072
2M782	1∅	0	0	0	2174
2M780	1∅	0	0	0	2237
7EQ13	1∅	0	0	0	1920
7HA89	1∅	0	0	0	1963
7EQ45	1∅	0	0	0	1993
2L823	1∅	0	0	0	2028
2L772	1∅	0	0	0	1917
2L761	1∅	0	0	0	1917
2L759	1∅	0	0	0	1930
14DR68	1∅	0	0	0	1948
104E58	1∅	0	0	0	1930
2N380	1∅	0	0	0	1951
2L755	1∅	0	0	0	1970
2L753	1∅	0	0	0	2030

Table 1 – High Fault Area Violations

A detailed listing of these System Upgrades can be found in the Results section below.

Thermal Overload Or Voltage Limit Violations

The Interconnection Customer's POI is on a single phase line. The Interconnection Customer will be responsible for rebuilding 1.4195 miles of line from single phase to three phase in order to accommodate the Generating Facility. A detailed listing of these System Upgrades can be found in the Results section below.

The interconnection of a Generating Facility shall not cause the service voltage to exceed DEP's distribution voltage standards. Additionally, the interconnection of a Generating Facility shall not cause the voltage change to exceed the limits defined in the document entitled RVC (Rapid Voltage Change) and Flicker Study Criteria ("Flicker"), attached in the Appendix at the end of this report. After evaluating the addition of the Generating Facility at the requested size of 4,992 kW, it was determined that there are no service voltage and Flicker violations.

The results of the evaluations are detailed in the Tables below. The "Retail Customer" refers to the location of a DEP retail customer who has the potential to experience the greatest effect with the addition of the Generating Facility. The Retail Customer may not refer to the same location between peak and valley circuit loading conditions. The "Substation" location refers to the regulated side of the substation. The voltages are presented on a 120V base and represent the medium voltage (primary) level.

Location	V _A	V _B	V _C	RVC Criteria "A"	RVC Criteria "B"
Retail Customer	123.9 – Pass	124.2 – Pass	124.4 – Pass	1.01% - Pass	1.66% - Pass
Retail Customer	124.6 – Pass	124.1 – Pass	124.8 – Pass	0.32% - Pass	0.98% - Pass
POI	123.9 – Pass	124.2 – Pass	124.4 – Pass	1.01% - Pass	1.66% - Pass
Substation	123.2 – Pass	124.1 – Pass	124.1 – Pass	0.32% - Pass	0.98% - Pass

Table 2 - Voltage Limit Results – Peak Circuit Loading with Existing Infrastructure

Location	V _A	V _B	V _C	RVC Criteria "A"	RVC Criteria "B"
Retail Customer	-	-	124.1 – Pass	0.60% – Pass	0.77% – Pass
Retail Customer	123.9 – Pass	124.2 – Pass	124.0 – Pass	0.07% – Pass	0.11% – Pass
POI	124.3 – Pass	124.4 – Pass	124.1 – Pass	0.60% – Pass	0.77% – Pass
Substation	123.5 – Pass	123.9 – Pass	123.4 – Pass	0.07% – Pass	0.11% – Pass

Table 3 - Voltage Limit Results – Valley Circuit Loading with Existing Infrastructure

The addition of the Generating Facility creates annealing violations for conductors on the existing DEP distribution system. Annealing is a change in the molecular structure of a metal conductor, thereby changing the conductor's physical and electrical properties; i.e. a decrease in tensile strength, thereby affecting sagging. In order to remediate the violations caused by the addition of the Generating Facility, the Interconnection Customer will be responsible for upgrades to correct these affected conductors. A detailed list of these System Upgrades can be found in the Results section below.

The existing 20 MVA substation transformer can adequately support the Interconnection Customer and the 11,852 kW aggregate Generating Facilities queued ahead of this project.

Grounding Requirements And Electric System Protection

The Generating Facility will supply transformers connected in the Wye-grounded (utility) / Wye-grounded (inverter) configuration. This configuration is acceptable for interconnection to the DEP system.

The interconnection facilities for the Generating Facility will be as per Figure 71B of the Requirements for Electric Service and Meter Installations manual, link provided below.

https://www.duke-energy.com/_/media/pdfs/partner-with-us/service-requirements-manual.pdf

The requirements for the Generating Facility are as follows, as per Figure 75C:

- a) Interconnection protection will be owned and operated by DEP and is to include a recloser, relaying (control), and remote communications for monitoring and operations.
 - i. Protection will utilize over current, under/over voltage, and under/over frequency relaying.
- b) DEP shall provide a manual load-break rated disconnect switch to serve as a clear visible indication of switch position between the utility and the Interconnection Customer. The switch must be readily accessible to DEP personnel.
- c) Interconnection Customer's inverters have to be tested and listed for compliance with the latest published edition of Underwriter Laboratories Inc., UL 1741 for utility interactive inverters.
- d) Interconnection Customer shall comply with the latest edition of IEEE 1547 and applicable series standards.

These requirements and the interconnection Figure are subject to change at any time.

A power quality (PQ) meter will also be installed with the interconnection facilities to continuously monitor the power quality impacts of the generating facility to the DEP system.

The Generating Facility is to be operated such that unity power factor is continuously maintained at the Point of Interconnection (where utility-owned metering is located).

Results

As a result of the interconnection of the Generating Facility, the System Upgrades detailed above will be required at the responsibility of the Interconnection Customer. A more in depth listing of these System Upgrades is detailed below.

1. Transmission Upgrades:
 - a. None.
2. Substation Upgrades:
 - a. None.
3. New Line Construction/Reconductoring:
 - a. Replace existing 1 - # 2 ACSR circuit with 3-477 AAC circuit from DIS# 2M845 to DIS# 2M843 (approximately 0.0775 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
 - b. Replace existing 1 - #4 BC circuit with 3-477 AAC circuit from DIS# 2M843 to DIS# 2M803 (approximately 1.342 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
 - c. Replace existing 3 - #2 ACSR circuit with 3-477 AAC circuit from DIS# 2M803 to DIS# 2L653 (approximately 1.114 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
4. Protection Upgrades/Sectionalization:
 - a. Remove 25 A Fuse at DIS# 2M803.
 - b. Install 3 x 50 A Fuses at DIS# 2M803.
 - c. Relocate the Hydraulic Recloser at DIS# 2KU54 to 2M725.
 - d. Install a G&W recloser at DIS# 2M725.
 - e. Install 1 x 25 A Fuses at DIS# 2M845.
 - f. Install 3 x 25 A Fuses at DIS# 2M840.
 - g. Install 1 x 25 A Fuses at DIS# 2M827.
 - h. Install 1 x 25 A Fuses at DIS# 2M819.
 - i. Install 1 x 25 A Fuses at DIS# 2M813.
 - j. Install 71 high fault tamer fuses.

1Ø - 2KJ54	1Ø - 2KW94	1Ø - 2KU91	1Ø - 2M885	1Ø - 2M830	1Ø - 2M813	1Ø - 6BY83
1Ø - 2KJ50	1Ø - 2KW93	1Ø - 2KU89	1Ø - 2M823	1Ø - 9NJ16	1Ø - 2M808	1Ø - 7HA89
1Ø - 2KJ49	1Ø - 2NA05	1Ø - 2KU86	1Ø - 2M822	1Ø - 2M827	1Ø - 2M790	1Ø - 7EQ45
1Ø - 2KJ43	1Ø - 2NA02	1Ø - 15LF06	1Ø - 149A06	1Ø - 6LT98	1Ø - 10AJ02	1Ø - 2L823
1Ø - 2KJ47	1Ø - 2KW98	1Ø - 2KU83	1Ø - 2M841	1Ø - 2M824	1Ø - 2M788	1Ø - 2L759
1Ø - 2KJ42	1Ø - 2KW96	1Ø - 2M903	1Ø - 8NJ03	1Ø - 2M819	1Ø - 2Q991	1Ø - 14DR68
1Ø - 2KG19	1Ø - 2NA16	1Ø - 2M901	1Ø - 8NJ04	1Ø - 2M816	1Ø - 2M793	1Ø - 104E58
1Ø - 2KG24	1Ø - 2NA13	1Ø - 2M898	1Ø - 2M837	1Ø - 6QA58	1Ø - 2M791	1Ø - 2N380
1Ø - 2L971	1Ø - 2KU98	1Ø - 2M897	1Ø - 2M835	1Ø - 15D739	1Ø - 2M782	1Ø - 2L755
1Ø - 2L968	1Ø - 2KU94	1Ø - 2M890	1Ø - 2M831	1Ø - 6QA55	1Ø - 2M780	1Ø - 2L753
1Ø - 2KJ58						

5. Other:
 - a. None.
6. Interconnection Facilities:

- a. Standard Interconnection Package connected as per Figure 71B.

The budgetary Interconnection Facilities estimate is \$60,000. The budgetary One-Time estimate for the required System Upgrades is \$774,000. These estimates are non-binding and are detailed in the Table below. Additionally, these estimates are only for the work required on the utility side of the POI.

	Cost
Transmission Upgrades	\$0
Substation Upgrades	\$0
New Line Construction/Reconductoring	\$705,000
Protection Upgrades/Sectionalization	\$69,000
Other	\$0
Total Upfront Charges	\$774,000

Table 4 - One-Time System Upgrades estimate

Appendix

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1 RVC (rapid voltage change) and flicker study criteria

Note: Effective January 4, 2018

This RVC & flicker criteria is termed as “DEC & DEP RVC & flicker version 3”.

1.1 RVC criteria “A”: 3% ΔV check for single DER shutdown

The study will evaluate the effect of a single DER shutdown, with the voltage change being evaluated anywhere on the circuit to assure a change of no greater than 3%.

1.2 RVC criteria “B”: 4% ΔV check for aggregate DER shutdown on circuit

The study will evaluate the effect of a shutdown of all DER on a circuit; this partially simulates the impact of a circuit trip and reclose event and the resulting voltage change across the circuit, comparing pre-fault & trip voltage with voltage after circuit restoration (and all DER on circuit offline). The voltage change will be evaluated anywhere on the circuit to assure a change of no greater than 4%.

1.3 RVC criteria “C”: 1.5% ΔV check at voltage regulators, for single DER output drop of 75%

The study will evaluate the effect of a 75% drop in DER output to assure that voltage does not change more than 1.5% at any voltage regulator locations. For ease of evaluation, a 100% drop will be evaluated against a 2% change at any voltage regulator locations (assumed to be mathematically equivalent to the 75%/1.5% criteria).

1.4 RVC criteria “D”: 3% ΔV check for transformer energization voltage sag

When using appropriate modeling techniques (e.g. PSCAD), the study will evaluate the effect of a transformer magnetization, with the voltage change being evaluated anywhere on the circuit to assure a change of no greater than 3%. Right now this is recommended for all facilities 1 MW and larger.

1.5 Flicker criteria

No specific evaluation will be performed, as it is Duke’s estimation that the RVC requirements should suffice at this time. The DER operator will be liable for correcting any retail customer power quality problems attributed to intermittent output. As PQ meters become more prevalent, Duke will consider the use of IEEE 1547-2018 and IEEE 1453, through monitoring Pst and Plt values.

2 Revision history

Revision	Date	Comments
1.0	9/13/2017	Initial release
1.1	9/19/2017	Effective date changed
1.2	1/8/2018	Addition of Maximum allowable step voltage changes criteria

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-5

Internal DEP e-mail dated
December 19, 2018, transmitting
the System Impact Study Report

To: DERContracts[DERContracts@duke-energy.com]
Cc: DEP Customer Owned Generation[DEPCustomerOwnedGeneration@duke-energy.com]; Whitaker, Jessica L.[Jessica.Whitaker@duke-energy.com]; Johnson, Ashleyanna[Ashleyanna.Johnson@duke-energy.com]; Liu, Juhua[Juhua.Liu@duke-energy.com]; Sanchez, Eugene[Eugene.Sanchez@duke-energy.com]; Bruton, Lee[Lee.Bruton@duke-energy.com]; Kirby III, John M[John.Kirby@duke-energy.com]; Medlin, Larry E[Larry.Medlin@duke-energy.com]; Hamilton, Donald Wayne[Donald.Hamilton@duke-energy.com]; McIntire, Kristy[Kristy.McIntire@duke-energy.com]; Archer, Kaitlyn E[Kaitlyn.Archer@duke-energy.com]; Sindhu, Goutami[Goutami.Sindhu@duke-energy.com]
From: DEP Customer Owned Generation
Sent: Wed 12/19/2018 10:40:40 AM (UTC-05:00)
Subject: DEP Official Release –System Impact Study – NC2016-02927 – Williams Solar, LLC
[181113-2309_2250-024_SLD sized resistor_Stamped 2.pdf](#)
[Williams System Impact Study Report with A.pdf](#)

IPP study release for cost estimating:

Substation: Newton Grove 230 kV
 Feeder: Newton Grove 23 kV
 Size: 4.992 MW
 Region: Eastern

Interconnection request files and customer technical information for this proposed IPP can be found at:
[\\nt000070\shares70\PEC Interconnected Generation\FILED IC Requests - 2016](#)

The subject project can be found in this folder by finding the folder name that matches the subject line.

SYSTEM UPGRADES Assuming NC2016-02927 – Williams Solar, LLC Commits to Installing (Budgetary One Time System Upgrade estimate of \$774,000)

As a result of a completed feeder study, the following work scope must be designed and cost-estimated (on its own work order) separately:

1. Reconductoring as follows:

- a) Replace existing 1 - # 2 ACSR circuit with 3-477 AAC circuit from DIS# 2M843 to DIS# 2M845 (approximately 0.0775 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
- b) Replace existing 1 - #4 BC circuit with 3-477 AAC circuit from DIS# 2M803 to DIS# 2M843 (approximately 1.342 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.
- c) Replace existing 3 - #2 ACSR circuit with 3-477 AAC circuit from DIS# 2L653 to DIS# 2M803 (approximately 1.114 miles). The existing neutral should be replaced with a 1/0 AAAC neutral.

2. Sectionalizing/protection changes as follows:

- a) Remove 25 A Fuse at DIS# 2M803.
- b) Install 3 x 50 A Fuses at DIS# 2M803.
- c) Relocate the Hydraulic Recloser at DIS# 2KU54 to 2M725.
- d) Install a G&W recloser at DIS# 2M725.
- e) Install 1 x 25 A Fuses at DIS# 2M845.
- f) Install 3 x 25 A Fuses at DIS# 2M840.
- g) Install 1 x 25 A Fuses at DIS# 2M827.
- h) Install 1 x 25 A Fuses at DIS# 2M819.
- i) Install 1 x 25 A Fuses at DIS# 2M813.
- j) Install 71 high fault tamer fuses.

1Ø - 2KJ54	1Ø - 2KW94	1Ø - 2KU91	1Ø - 2M885	1Ø - 2M830	1Ø - 2M813	1Ø - 6BY83
1Ø - 2KJ50	1Ø - 2KW93	1Ø - 2KU89	1Ø - 2M823	1Ø - 9NJ16	1Ø - 2M808	1Ø - 7HA89
1Ø - 2KJ49	1Ø - 2NA05	1Ø - 2KU86	1Ø - 2M822	1Ø - 2M827	1Ø - 2M790	1Ø - 7EQ45
1Ø - 2KJ43	1Ø - 2NA02	1Ø - 15LF06	1Ø - 149A06	1Ø - 6LT98	1Ø - 10AJ02	1Ø - 2L823
1Ø - 2KJ47	1Ø - 2KW98	1Ø - 2KU83	1Ø - 2M841	1Ø - 2M824	1Ø - 2M788	1Ø - 2L759

1Ø - 2KJ42	1Ø - 2KW96	1Ø - 2M903	1Ø - 8NJ03	1Ø - 2M819	1Ø - 2Q991	1Ø -14DR68
1Ø - 2KG19	1Ø - 2NA16	1Ø - 2M901	1Ø - 8NJ04	1Ø - 2M816	1Ø - 2M793	1Ø - 104E58
1Ø - 2KG24	1Ø - 2NA13	1Ø - 2M898	1Ø - 2M837	1Ø - 6QA58	1Ø - 2M791	1Ø - 2N380
1Ø - 2L971	1Ø - 2KU98	1Ø - 2M897	1Ø - 2M835	1Ø -15D739	1Ø - 2M782	1Ø - 2L755
1Ø - 2L968	1Ø - 2KU94	1Ø - 2M890	1Ø - 2M831	1Ø - 6QA55	1Ø - 2M780	1Ø - 2L753
1Ø - 2KJ58						

3. Other changes as follows:

- a) Verify that the substation regulator is set to either Ignore Mode or Co-Generation Mode (based on the control type).

There could be as much as 9.292 MW shipped back into the substation during low load periods from the Newton Grove 23 kV feeder.

Interconnection Facilities (Budgetary Interconnection Facilities estimate \$60,000)

Interconnection Pole will be 2M845. (35.278505, -78.367579)

Install a maximum of 2 spans of 3 - #477 AAC primary and #1/0 AAAC neutral tap from Pole 2M845 to POD. Deviation from this recommendation requires the approval of the local PQR&I representative or the local Distribution Capacity Planner.

POD per Figure 71B (overhead).

Install G&W recloser one pole to Duke Energy Progress side of POD.

Install Power Quality (PQ) Meter per Figure 71B

“NOTE: The generating facility is to be operated such that unity power factor is continuously maintained at the Point of Delivery (where utility-owned metering is located).”

Please direct other technical questions to DEPCustomerOwnedGeneration@duke-energy.com.

Notes:

1. Attached is a copy of the customer’s approved one-line. Any changes to the attached one-line must be submitted to Duke Energy Progress for approval.
2. Duke Estimated Construction Hours – 5,157
3. System Upgrade Estimated Mileage – 2.5335 miles
4. Project Charging Information:
 - a. OU: AJ9D
 - b. Activity: IMP
 - c. Project #: DCS015007

Thank you,

DPAC&DG

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-6

Respondent Duke Energy Progress,
LLC's Responses to Complainant's
First Set of Interrogatories and
Requests for Production of
Documents

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1220

In the Matter of)	
Williams Solar, LLC,)	
)	
Complainant)	
)	RESPONDENT DUKE ENERGY
)	PROGRESS, LLC'S RESPONSES
)	TO COMPLAINANT'S FIRST SET
v.)	OF INTERROGATORIES AND
)	REQUESTS FOR PRODUCTION
Duke Energy Progress, LLC,)	OF DOCUMENTS
)	
Respondent)	

Pursuant to Rules 26, 33, and 34 of the North Carolina Rules of Civil Procedure and the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”), Duke Energy Progress, LLC’s (“DEP”, or “the Company” or “Duke”) hereby submits this response to Complainant Williams Solar, LLC’s (“Williams Solar” or “Complainant”) First Set of Requests for Production of Documents and Interrogatories (“Requests”).

OBJECTIONS TO INSTRUCTIONS

1. Duke objects to Williams Solar’s instruction No. 4 to the extent it directs Duke to identify “the name of the witness in this proceeding who will sponsor the answer and can vouch for its accuracy.” At this time, Duke has not identified the Company personnel who will testify in this proceeding. Moreover, the Company’s trial preparation materials, including but not limited to the case strategy of Duke’s attorneys and the draft pre-filed testimony of Duke’s prospective witnesses are protected as attorney work product and not subject to discovery. Nevertheless, Duke’s answers to Complainants’ Requests identify the employee sponsor(s) for each Response, which reflects the personnel who participated in preparing that Response.

GENERAL OBJECTIONS

Each of the specific responses below is made subject to and without waiving these General Objections:

1. The information contained herein is provided in accordance with the provisions and intent of the North Carolina Rules of Civil Procedure and the North Carolina Utilities Commission’s Rules and Regulations, which call for the disclosure of non-privileged information and materials within the responding party’s possession, custody, or control that may be relevant or lead to the discovery of admissible evidence. These responses are made without waiving any rights or objections, or admitting the authenticity, relevancy, materiality, or

admissibility into evidence of the subject matter or facts in any Request or any response thereto. Furthermore, Duke specifically reserves the right to object to the uses of any response, or the subject matter thereof, on any grounds in any further proceeding in this action.

2. Duke objects to the Requests (including the instructions and definitions accompanying the Requests) to the extent that they impose requirements beyond those set forth in the North Carolina Rules of Civil Procedure and/or the North Carolina Utilities Commission's Rules and Regulations.

3. Duke objects to the Requests to the extent that they seek information unrelated to issues raised in this action. Any production of information not related to the issues raised by this action shall not waive this objection and shall not be deemed to consent to the admissibility of such information.

4. Duke objects to the Requests to the extent they call for production of mental impressions of counsel or information that was prepared in anticipation of litigation and/or that is otherwise protected by the attorney-client privilege, the work product doctrine, or other applicable privileges.

5. Duke objects to each Request to the extent it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, or is not proportional to the scope of this case. In particular, Duke objects to each Request to the extent it calls for the production of "all documents and data" related to identified topics, as a complete, unfiltered search of the Company's voluminous electronic data would be unduly burdensome and not proportional to the scope of this case. Where such requests for "all documents and data" are made, Duke undertook reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to each Request, and such personnel

identified as a “Sponsor” of each Response have produced responsive information and documents.

6. Duke objects to each Request to the extent it seeks information or Documents that precedes the time period during which Williams Solar has been an Interconnection Customer of DEP (October 2016 to present), as such Requests are unduly burdensome, not relevant to the Company’s processing of Williams Solar’s Interconnection Request or reasonably calculated to lead to the discovery of admissible evidence, and are not proportional to the scope of this case.

Docket No. E-2, Sub 1220
Williams Solar Data Request No. 1
Item No. 1-1
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

Request:

1. Provide the entire basis for DEP's initial estimate of \$774,000, including, without limitation, an itemization of all costs included in that estimate and any overhead amounts assumed in that estimate. As part of your response, identify all documents evidencing or relating to the estimate.

Response:

Each generator interconnection project's preliminary estimated upgrade cost projections developed by DEP in the System Impact Study are calculated based on a standardized template cost estimation tool, SIS Estimate Tool Rev1, as further discussed in the Company's response to Williams Solar's Request Nos. 1-7 and 1-8. The SIS Estimate Rev1 is the most updated version of the SIS Estimate Tool Rev0. Further explanation of the process DEP uses to estimate costs is provided in DEP's response to Data Request No. 1-3.

The System Modifications project file used to generate preliminary estimated upgrade costs for Williams Solar is being produced in response to Request for Production No. 1-2, and is labeled "Williams Solar Estimation Tool SIS.xls." Labor, materials, and overhead are included in the \$774,000 estimate based on work management data available as of the issuance date of the System Impact Study report for Williams Solar.

Sponsor: Neil Bhagat, Manager, Asset Management/Distributed Generation, Duke Energy

Docket No. E-2, Sub 1220
 Williams Solar Data Request No. 1
 Item No. 1-2
 Page 1 of 1

DUKE ENERGY PROGRESS, LLC

Request:

2. Provide the entire basis DEP’s estimated installed cost of \$1,388,374.26, including, without limitation, an itemization of all costs included in that estimate and any overhead amounts assumed in that estimate. As part of your response, identify all documents evidencing or relating to the estimate.

Response:

The \$1,388,374.26 refers to the Estimated System Upgrades plus Sales Tax of 7%

Estimated System Upgrade:	\$1,297,546.03
NC Sales Tax – 7%:	\$ 90,828.22
Total:	\$1,388,374.25

The System Upgrades are comprised of:

- Labor Costs
- Labor Overheads
- Vehicle and Equipment Costs
- Vehicle and Equipment Costs Overheads
- Material Costs
- Material Overheads
- Contingency – 20%

Estimated Labor Costs Total (LC)	\$	725,040.00
Estimated Vehicle / Equipment Total (VC)	\$	290,016.00
Estimated Total Material Costs (EMC)	\$	282,490.03
Estimate	\$	1,297,546.03

Total Labor Costs (LC) for Project

LC	\$3,180 X 1 crew x 4 people per crew times 38 weeks	= \$483,360
Contingency	\$483,360 X 0.20	= \$ 96,672
Overheads	\$580,032 X 0.25	= \$145,008
Total Labor Costs (LC)		= \$725,040

Vehicle Costs (VC)

Cost per Man Week = $(\$30 \times 5 \times 8) \times 1.06$	= \$ 1,272
VC \$ 1,272 X 1 crew x 4 people per 38 weeks	= \$193,344
Contingency \$193,344 X 0.20	= \$ 36,689
Overheads \$232,013 X 0.25	= \$ 58,003
Total VC (with Inflation and Overheads)	= \$290,016

Estimated Material Costs (EMC)

\$143,328 X 1.06 inflation assumption for 2 years	= \$151,927
Material Overheads \$151,927 X 0.4875	= \$ 74,065
Sub Total \$151,927 + \$74,065	= \$225,992
Contingency \$225,992 X 0.20	= \$ 45,198
Overheads \$45,198 X 0.25	= \$ 11,300
Total EMC (with Inflation and Overheads)	= \$282,490

Sponsor: Beckton James, Senior Business and Technical Consultant, Duke Energy

Docket No. E-2, Sub 1220
Williams Solar Data Request No. 1
Item No. 1-3
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

Request:

3. With respect to the cost data relied upon by DEP in generating cost estimates for interconnection customers, state (a) how the cost data were estimated, (b) who performed the estimation, and (c) whether they reflect competitive bidding prices for parts, equipment, and labor.

Response:

Generator Interconnection cost estimates are generated in two phases corresponding to the System Impact Study and Facilities Study processes:

First, the System Impact Study estimated cost are based on reviewing the upgrades identified in the System Impact Study Report with the existing conditions and any current proposed non-DER upgrades in the DEP Graphical Information System (GIS) and a per mile cost estimation sheet. The SIS Estimation Tool Rev0 (which is being produced in DEP's response to Request for Production of Documents No. 5), has typical system upgrade project cost estimates on a per mile basis. These estimated cost data inputs to the cost estimate sheet were developed by the Capacity Planning Department based on overhead distribution line construction completed in DEP on a per mile cost basis. This cost estimation sheet is utilized to estimate costs for both internal overhead distribution line construction projects, as well as System Impact Study estimates for generator interconnections. The Capacity Planning Department also more recently developed the SIS Estimation Tool Rev0 based on completed projects. The cost data relied upon by DEP in generating cost estimates in the cost estimate tool is based upon the following categories of procured costs:

- a. Overhead Contractors (Labor/Equipment) – The contractors completing those projects were selected on a competitive basis and were required to satisfy DEP's qualifications including safety, construction quality, presence in our region, ability to scale, cost and other factors.
- b. Material/Parts – Duke obtains competitive pricing for material purchases and performs a technical and commercial evaluation to determine the best overall evaluated pricing to select an approved supplier or in many cases multiple suppliers. Duke periodically reviews market conditions to assess indices relative to raw material cost and perform cost modeling for approved price adjustments.
- c. Engineering Labor - Pike Engineering is an engineering contractor for both Duke Energy Progress and Duke Energy Carolinas. Their rates for engineering labor were competitively bid.

Second, the detailed cost estimate provided in the Facilities Study is developed by Duke's Major Projects design organization, either by a Duke Energy Engineering Technologist, or by an offsite contract engineering partner such as Pike Engineering, with final review by a Duke Energy Engineering Technologist. This design process is completed in Maximo, which is used in conjunction with a MicroStation based graphical design tool, Bentley Open Utilities Designer (BOUD), for the development of schedulable tasks, bills of material, and cost estimates. This process is used for all types of Distribution construction work, including Customer Additions, Capital Maintenance, System Improvements, as well as generator interconnections. Compatible units are used as the basis for the design process, specifically for purposes of developing an estimate of the materials and labor hours required to perform the scope of work for a given design.

DEP began using the Maximo and BOUD tools for work order design and estimation in November 2017. Prior to this date, DEP used a similar system called Work Management Information System (WMIS), developed by CGI, for the same purposes. WMIS also utilized a compatible unit process in order to develop estimates of material and labor hours.

In both systems, the process of using compatible units to develop the design and cost estimate involves selection of compatible units, which represent the scope of work being performed. The compatible unit library used in both systems contained a combination of material only compatible units, labor only compatible units, and combination material/labor compatible units. The selection process for compatible units is based on the currently published Distribution Standards manual, which specifies the materials and equipment used for approved styles of installations.

Most compatible units on a design are associated with primary material items used, such as poles, conductor, switches, etc. Each of these compatible units captures what material item numbers and how many labor hours are required to perform the work associated with the compatible unit. Material only compatible units are less common, and associated with minor items such as hardware and connectors in which the labor hours are associated with a higher-level compatible unit. Finally, labor only compatible units are added to a design to capture anticipated labor time that is not reflected in a material only compatible units. Examples of labor-only compatible units are hand digging for poles or anchors, transferring conductor, and laying wire out for reconductors.

In addition to the material and labor compatible units noted above, designers have an opportunity to include "cost adder" compatible units to account for unique costs not associated with standard construction. Examples of when cost adder compatible units might be used are environmental permitting, controls and/or remediation, or other civil work such as asphalt/concrete removal or remediation.

Once a designer has tabulated the list of compatible units associated with a design for the given scope of work, they perform a step called "estimation" which calculates the total material and labor costs for the design. The design cost estimate is based on the following components: direct material costs, material overheads, direct labor costs, and labor overheads. Labor costs are

described in more detail in the Company's responses to Request Nos. 1-4 and 1-10. Material costs are estimated based on near real-time system average costs. Duke obtains competitive pricing for material purchases and performs both a technical and commercial evaluation to determine the best overall evaluated pricing to select an approved supplier or in many cases multiple suppliers before executing contracts. Periodically, a review of market conditions is performed to assess indices relative to raw material cost and perform cost modeling for approved price adjustments.

Following development of the Maximo cost estimate, generator interconnection projects are then run through a secondary cost estimation tool, the Revised Estimating Tool ("RET"), which was developed to help provide more accurate cost to customers based on actual construction costs. A detailed explanation of this revised cost estimating tool, labeled "DR No. 1-3 Revised Estimating Tool Description – Williams Solar.doc," is being produced in Request for Production of Documents No. 1.

The RET updates the existing cost produced in Maximo to more accurately reflect total project costs Duke will likely incur from completion of Facilities Study through completion of interconnection-related project construction. The primary adjustments made by the RET are accounting for increased future costs by projecting inflation-impacted labor, material and equipment costs, modeling more likely resourcing and equipment requirements and adding a contingency factor for unforeseen events that have historically increased costs for generator interconnection projects.

Sponsors: Brian Dale, Engineer III, Asset Management Distributed Generation; Genevieve Bestercy, Sourcing Specialist, Transmission and Generation Grid Solutions Labor and EPC; Beckton James, Senior Business and Technical Consultant, Duke Energy; Scott Jennings, Director, Customer Delivery Area Operations; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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DUKE ENERGY PROGRESS, LLC

Request:

4. Describe how contracts for construction of interconnection facilities and system upgrades are awarded, including, without limitation, whether such contracts are the result of competitive bidding or are sole-source contracts.

Response:

In 2017, DEP undertook a targeted competitive request for proposal and negotiation process to obtain construction contractor services for overhead/underground distribution line construction services, including construction of interconnection facilities and system upgrades, in the Carolinas region. Many rounds of negotiations and evaluations resulted in the award of four contracts for construction contractor services for designated geographic regions of DEP's system. The negotiated contracts are for a term of five years, extending through 2022. The Company is producing the single source justification forms documenting the award of these contracts in response to this request. These files are labeled as follows and being produced in response to Request for Production No. 1-10:

- "CONFIDENTIAL DR No. 1-4 2017 SSJ Form Mastec.pdf"
- "CONFIDENTIAL DR No. 1-4 2017 SSJ Form Pike.pdf"
- "CONFIDENTIAL DR No. 1-4 2017 SSJ Form Sumter.pdf"
- "CONFIDENTIAL DR No. 1-4 2017 SSJ Form ULCS.pdf"

DEP will produce the foregoing documents information subject to a mutually-agreeable confidentiality agreement between DEP and Williams Solar. DEP has redacted all Interconnection Customer-identifiable information as confidential and/or proprietary and not subject to disclosure under the North Carolina Interconnection Procedures.

Sponsor: Genevieve Bestercy, Sourcing Specialist, Transmission and Generation Grid Solutions
Labor and EPC

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DUKE ENERGY PROGRESS, LLC

Request:

5. Describe in detail the process used to create the Preliminary Estimated Upgrade Charge provided to Williams Solar. As part of your response, identify (a) all individuals who participated or otherwise assisted in creating the Preliminary Estimated Upgrade Charge provided to Williams Solar, LLC and the role of and actions taken by such person; and (b) all documents or data reflecting or evidencing the estimate.

Response:

A study engineer is responsible for creating the Preliminary Estimated Upgrade Charge for the System Impact Study Report. The study engineer reviewed the project under the DEP's System Impact Study evaluation process, which is described in a file labeled "System Impact Study SOP.pdf" being produced in DEP's response to Request for Production of Documents No. 5. Based upon this review, the study engineer then identified necessary upgrades required to safely and reliably interconnect the Williams Solar facility. The identified upgrades were then itemized and entered into the System Impact Study cost estimation spreadsheet by the study engineer, as further described in DEP's response to Data Request No. 1-3. Within the cost estimation spreadsheet, each upgrade was assigned a cost. The total upgrades cost was then calculated.

For Williams Solar, the study engineer responsible for developing the Preliminary Estimated Upgrade Charge included in the System Impact Study Report was a Pike Engineering Employee. Duke Energy Engineers review portions of the System Impact Study and provide approval for their department. Capacity Planner Alex Winslow reviewed the voltage and RVC study. Distribution Protection and Control engineer Andrew Kurczek (Pike Engineering) reviewed the protection study. The system upgrades necessary to safely and reliably interconnection the facility are identified through the voltage, RVC, and Protection studies. The two engineers mentioned above reviewed the accuracy of the study and confirmed the preliminarily-identified upgrades are needed, but do not estimate the cost for the identified system upgrades. The standardized cost estimation tool used to generate preliminary estimated upgrade costs for Williams Solar is further described in response to Request Nos. 1-1 and 1-3, and is being produced in response to Request for Production of Documents No. 5.

Sponsor: Neil Bhagat, Manager, Asset Management/Distributed Generation/ Dmitri Moundous, Senior Engineer, Asset Management/Distributed Generation

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DUKE ENERGY PROGRESS, LLC

Request:

6. Identify by line item type the “historic cost data for similar projects,” if any, used by DEP in developing the Preliminary Estimated Upgrade Charge. As part of your response, identify the project(s) for which such data was acquired and the period during which the upgrades for such project(s) were constructed.

Response:

The creation of the “SIS Estimation Tool Rev0” tool originated in work order designs created in the late 1990’s or early 2000’s for general distribution work. Sometime between 2000 and 2005, the work orders were converted to the Work Management Information System (WMIS) and the format of the “SIS Estimation Tool Rev0” tool was developed. Work orders were created in WMIS on various types of construction needed to complete System Improvement projects. The work orders were based upon generic work orders historically and were initially refreshed annually through a labor intensive manual process. Each year, if a new type of System Upgrade was needed, a new work order would be created to cover the need. These work orders correspond to “historic cost data for similar projects” referenced in DEP’s Answer.

In recent years, an adjustment factor was added to the SIS Estimation Tool Rev0 to increase labor costs based experienced changes in labor expense. As more time passed between the latest revision of the estimates used to feed the tool and the application of the tool, a decision was made to increase the base labor factor to keep up with rising labor charges.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Neil Bhagat, Manager, Asset Management/Distributed Generation; Jack McNeil, Director, Asset Management Dmitri Moundous, Senior Engineer, Asset Management/Distributed Generation

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DUKE ENERGY PROGRESS, LLC

Request:

7. Describe in detail DEP's efforts, if any, during the period from January 1, 2015, to the present, to update the cost data per line item type used to generate Preliminary Estimated Upgrade Charges. As part of your response, identify all documents evidencing or relating to such efforts.

Response:

DEP objects to the temporal scope of this request "from January 1, 2015, to the present" as overbroad, unduly burdensome and because DEP's "efforts...to update the cost data per line item type" prior to the date that Williams Solar submitted an Interconnection Request is not relevant to the issues raised in the Complaint, as such "efforts" do not impact the Preliminary Estimate Upgrade Charge for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

The cost data per line item values were not updated during the period January 1, 2015 through June 2019 for the SIS Estimation Tool Rev0. The updated System Impact Study cost estimation tool, "SIS Estimation Tool Rev1, was created in June 2019 as discussed in the Company's response to Data Request No. 1-8. Also in June 2019, however, after a number of generator interconnection Final Accounting Report ("FAR") true ups were completed, DEP determined that the SIS Estimation Tool Rev 1 needed to have an additional contingency factor of 2.0 added to more accurately reflect the estimate of interconnection facilities and system upgrade costs.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Neil Bhagat, Manager, Asset Management/Distributed Generation; Jack McNeil, Director, Asset Management

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DUKE ENERGY PROGRESS, LLC

Request:

8. Describe, and provide the reason for, any change during the period January 1, 2015, to the present, to the procedure by which DEP generates estimates of the cost of system upgrades or interconnection facilities to be provided with system impact studies, including changes to any tool used to generate such estimates and changes to any assumptions made in generating those estimates. As part of your response, identify all documents evidencing any change identified in response to this interrogatory.

Response:

DEP objects to the temporal scope of this request “during the period January 1, 2015, to the present” as overbroad, unduly burdensome, and because any “change...to the procedure by which DEP generates estimates of the cost of system upgrades or interconnection facilities” made prior to the date that Williams Solar submitted an Interconnection Request to DEP is not relevant to the procedures employed by DEP to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

As explained in the Company’s response to Request Nos. 1-3 and 1-7, DEP first updated the Facility Study cost estimation process and afterwards updated the System Impact Study cost estimation process in June of 2019, creating the SIS Estimation Tool Rev1. DEP did not modify the procedure or tools used for estimating System Impact Study costs during the period 2015 throughout June 2019. Over the last few years, DEP has adjusted labor, equipment and material values to account for increasing costs. However, there has been no changes in the procedure by which DEP generated estimates of the cost of system upgrades or interconnection facilities to be provided with system impact studies. The provided documents labeled “SIS Estimation Tool Rev0” and “SIS Estimation Tool Rev1” reflect the adjustment in costs and are provided in response to Document Request No. 5. SIS Estimation Tool Rev0 was the original tool used by DEP engineers to estimate internal work. The SIS Estimation Tool Rev1 was created from Rev0 in June 2019 for interconnection projects.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Neil Bhagat, Manager, Asset Management/Distributed Generation; Jack McNeil, Director, Asset Management
Dmitri Moundous, Senior Engineer, Asset Management/Distributed Generation

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DUKE ENERGY PROGRESS, LLC

Request:

9. For the period 2015 to the present, describe any difference between DEP's process for estimating costs of constructing upgrades necessary for interconnection of independent generation (i.e., PURPA qualified facilities) and DEP's process for estimating DEP's own construction costs (i.e., for system modifications including for interconnection of DEP's own generation facilities or other system modifications undertaken by DEP), including, without limitation, (a) identifying any difference in the estimation of the cost of parts, labor, and overheads; and (b) identifying any difference in the actual cost of parts, labor, overheads, and labor rates for such projects.

Response:

DEP objects to the temporal scope of this request "for the period January 1, 2015 to the present" as overbroad, unduly burdensome and because "any difference between DEP's process for estimating costs of constructing upgrades necessary for interconnection of independent generation (i.e., PURPA qualified facilities) and DEP's process for estimating DEP's own construction costs (i.e., for system modifications including for interconnection of DEP's own generation facilities or other system modifications undertaken by DEP)," having occurred prior to the date that Williams Solar submitted its Interconnection Request to DEP is not relevant and outside the scope of this proceeding, as such differences have no effect on the procedures employed by DEP to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

DEP utilizes the same design and cost estimating process (use of Maximo and common design standards) for all Distribution construction projects that is used for estimating costs of construction upgrades necessary for interconnection of independent generation (i.e. PURPA qualifying facilities) and DEP's own construction costs (i.e., for system modifications including for interconnection of DEP's own generation facilities or for customer addition, reliability improvement or other system modifications undertaken by DEP). Specifically, DEP utilizes Maximo for both independent generation and DEP-owned projects, as further described in the Company's response to Data Request No. 1-3. However, as described in DEP's response to Request No. 1-3, DEP has also integrated a generator interconnection-specific Revised

Estimating Tool as part of the Facilities Study process. A similar mechanism is utilized for NCDOT requested relocations, in which a Maximo design estimate is run through a secondary estimating tool that was developed based on actual costs experienced for NCDOT requested projects.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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DUKE ENERGY PROGRESS, LLC

Request:

10. Describe DEP's efforts, if any, during the period from January 1, 2015, to the present, to update the cost data used to generate internal estimates of the costs of DEP's own upgrades of or modifications to the distribution system or transmission system. As part of your response, identify all documents evidencing or relating to such efforts.

Response:

DEP objects to the temporal scope of this request "during the period from January 1, 2015, to the present" as overbroad, unduly burdensome and because DEP's "efforts [to] update the cost data" prior to the date that Williams Solar submitted its Interconnection Request to DEP is not relevant and outside the scope of this proceeding, as such efforts did not impact the procedures DEP employed to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

As noted in the Company's response to Data Request No. 1-3, Duke's cost estimates to perform overhead distribution system construction work, including generator interconnection-related work, are based on the following: direct material costs, material overheads, direct labor costs, and labor overheads. Note there is no difference in the cost data used for DEP's internal estimates of its own upgrades as compared to the cost data used for generator interconnection upgrades.

Since the implementation of Maximo in November 2017, material costs are tracked internally and shared within the different applications of Maximo on a near real-time basis. Material costs for design estimates are based on system average cost for each item number, based on purchase and transaction history for each item, at the time when the estimate is performed. In addition to these direct material costs, the system then adds an overhead percentage, which is calculated on an annual basis by Duke's Finance department to represent the stores and handling costs associated with internal Supply Chain processes.

Labor cost is calculated based on a summation of all the labor hours associated with the compatible units included on the design, the type(s) of construction resource (overhead, underground, etc.) required to perform the work, and the system average hourly labor rate

associated with the type(s) of construction resources required. As with material costs, there is also a labor overhead percentage that is applied to the labor cost and represents the engineering, administrative and management costs associated with support of the direct construction work. Both the hourly labor rates and the labor overhead percentages are calculated on an annual basis by Duke's Finance department.

When reviewing the recent history (3-5 years) of cost estimates produced by the systems as described above, material costs have been reasonably accurate (when comparing estimated to actual costs) and consistent in terms of year over year changes. However, when comparing Duke's historical experience for labor costs, actual labor costs have exceeded estimated labor costs. In response, Duke took the following steps in Fall 2019 to develop more accuracy in labor cost estimating within Maximo:

- Detailed analysis of the labor hours included in commonly used compatible units
- Detailed analysis of how weighted hourly labor cost is calculated.

Based on the analysis of labor hours associated with compatible units in DEP, it was determined that the number of manhours associated with common tasks such as installing poles, transformers and line hardware were too low. This determination was based on comparison of these tasks against both Construction SME input and unit-based contract rates. Increases are attributed to new safety work practices that have been implemented over the past several years. As a result, labor manhours were increased on the compatible units such that it represented an approximately 20% increase to the time necessary to perform typical overhead distribution construction work.

In addition to the labor hours associated with tasks, the calculation of hourly labor rates used for cost estimating in Maximo was also reviewed. Historically, cost estimates had been produced based on an internal (Duke Energy employee) labor assumption. Over time, labor costs for contracted labor have increased to the point that they are higher than Duke internal rates, but this input had not previously been considered within Maximo. A new formula was developed to create a weighted average manhour rate for use in Maximo that reflected the balance of internal and external labor used in each jurisdiction. This update resulted in a ~15% increase to the hourly manhour rate used and is reflected in the graph in response to Request No. 21.

The data updates described above became effective for cost estimates developed in Maximo starting in Q4 2019. These would not have had an impact on the development of cost estimates associated with cost estimates provided to Williams Solar.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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DUKE ENERGY PROGRESS, LLC

Request:

11. Describe in detail the process used to create the estimate of system upgrade charges provided to Williams Solar in connection with the Facility Study Report. As part of your response, identify (a) all individuals who participated or otherwise assisted in creating the estimate of system upgrade charges provided to Williams Solar in connection with the Facility Study Report and the role of and actions taken by such person; and (b) all documents or data reflecting or evidencing the estimate.

Response:

Please see DEP's responses to Data Request Nos. 1-3 and 1-9.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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DUKE ENERGY PROGRESS, LLC

Request:

12. Describe DEP's efforts, if any, during the period from January 1, 2015, to the present, to update the cost data used to generate estimates of the cost of system upgrades or interconnection facilities to be provided with facilities study reports. As part of your response, identify all documents evidencing or relating to such efforts.

Response:

DEP objects to the temporal scope of this request "during the period from January 1, 2015, to the present" as overbroad, unduly burdensome and because DEP's "efforts . . . update the cost data used to generate estimates of the cost of system upgrades or interconnection facilities to be provided with facilities study reports" prior to the date that Williams Solar submitted its Interconnection Request to DEP is not relevant and outside the scope of this proceeding, as such efforts did not impact the procedures DEP employed to generate the cost of system upgrades or interconnection facilities provided for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Please see DEP's responses to Request Nos. 1-3 and 1-10.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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DUKE ENERGY PROGRESS, LLC

Request:

13. Describe any change during the period January 1, 2015, to the present, to the procedure by which DEP generates estimates of the cost of system upgrades or interconnection facilities to be provided with facilities study reports, including, without limitation, changes to any tool used to generate such estimates and changes to any assumptions made in generating those estimates. As part of your response, identify all documents evidencing any change identified in response to this interrogatory.

Response:

DEP objects to the temporal scope of this request “during the period from January 1, 2015, to the present” as overbroad, unduly burdensome and because DEP’s “changes . . . to the procedure by which DEP generates estimates of the cost of system upgrades or interconnection facilities to be provided with facilities study reports” prior to the date that Williams Solar submitted its Interconnection Request to DEP is not relevant and outside the scope of this proceeding, as such efforts did not impact the procedures DEP employed to generate the cost of system upgrades or interconnection facilities provided for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Please see DEP’s responses to Data Request Nos. 1-3 and 1-10.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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DUKE ENERGY PROGRESS, LLC

Request:

14. Describe in detail the investigation referred to at pages 4 and 5 of DEP's Answer and Motion to Dismiss and its conclusions, including, without limitation, identifying the date DEP determined an investigation was needed, the date the investigation began, the date the investigation concluded, all individuals who participated in the investigation and the role of and actions taken by each such person. As part of your response, identify all documents evidencing changes to the estimation process that were considered, proposed, recommended, or adopted by DEP as a result of the investigation, and all documents evidencing the conclusions DEP reached as a result of the investigation.

Response:

Please see DEP's response to Data Request No. 1-15.

Individuals who participated in the investigation and the role of and actions taken by such person:

(1) Gary Freeman

- *Department:* Interconnection Queue Management (DET Management)
- *Company Role:* General Manager, DET Renewable Integration and Operations (Retired from Duke Energy in Q1 2019)
- *Investigation Role:* In Q1 2018, Freeman directed DET Process, Governance, and Reporting Department employees (Donna Massengill and Beckton James) to further investigate observed discrepancies between estimated construction costs and actual construction costs for distribution interconnection projects coming online during Q4 2017.

(2) Ken Jennings

- *Department:* Interconnection Queue Management (DET Management)
- *Company Role:* General Manager, DET Renewable Integration and Operations (Assumed role after Freeman's retirement during Q1 2019)
- *Investigation Role:* In Q2 2019, Jennings reviewed and approved the updated cost estimate tool developed by James, Bhagat, and Andreasen for DEP and DEC distribution interconnection project facility studies. In Q3 2019, Jennings directed DET Management and DET Account Management to work with Distribution Planning and Distributed Generation to apply the updated cost estimate tool to DEP and DEC distribution interconnection projects in construction and subsequently provide updated cost estimate notices to these Interconnection Customers.

(3) Donna Massengill

- *Department:* DET Process, Governance, and Reporting (DET Governance & Process)
- *Company Role:* Manager, Renewable Energy Contracts & Process Governance
- *Investigation Role:* In Q1 2018, Massengill acted on direction received from Freeman to further investigate discrepancies between estimated construction costs and actual construction costs for distribution interconnection projects.

(4) Beckton James

- *Department:* DET Process, Governance, and Reporting (DET Governance & Process)
- *Company Role:* Senior Business and Technical Consultant
- *Investigation Role:* In Q1 2018, James assisted Massengill by compiling generation interconnection cost data to investigate discrepancies between estimated construction costs and actual construction costs for distribution interconnection projects. Also during this time, James began development on an initial version of an updated distribution system upgrade cost estimating tool based on cost data collected by James and Flowers during the final accounting process. The updated cost estimating tool was developed for potential use during distribution interconnection project facility studies conducted in DEP and DEC. In Q1 2019, James further developed and shared an early version of the updated cost estimate tool with the other departments referenced in this response. In Q2 2019, James worked with McNeil, Bhagat, and Andreasen to further develop, conduct final testing, and receive final approvals from the other departments for use of updated cost estimate tool for distribution interconnection project facility studies. In Q3 2019, James trained Distribution Planners on how to apply the updated cost estimate tool to provide distribution interconnection project costs for future facility study reports.

(5) Scott Jennings

- *Department:* Zone Operations CARs Coastal (Distribution Planning)
- *Company Role:* Director, CD Area Operations
- *Investigation Role:* In Q2 2019, Jennings directed Distribution Planners to use the updated cost estimate tool developed by James, McNeil, Bhagat and Andreasen for all DEP and DEC distribution interconnection project facility studies going forward. In Q3 2019, Jennings directed Distribution Planners to work with Distributed Generation and DET Account Management to apply the updated cost estimate tool to DEP and DEC distribution interconnection projects in construction.

(6) Jeff Riggins

- *Department:* Interconnection Queue Management (DET Management)
- *Company Role:* Director, Standard PPAs & Interconnects
- *Investigation Role:* In Q2 2019, Riggins reviewed and approved the updated cost estimate tool developed by James, Bhagat, and Andreasen for distribution interconnection project facility studies in DEP and DEC. In Q3 2019, Riggins directed DET Account Management to work with Distribution Planning and Distributed Generation to apply the updated cost estimate tool to DEP and DEC distribution interconnection projects in construction and subsequently provide updated cost estimate notices to this subset of projects.

(7) Scott Reynolds

- *Department:* Interconnection DEP (DET Account Management)
- *Company Role:* Manager, Interconnection PPA and Account Management
- *Investigation Role:* In Q2 2019, Reynolds reviewed and approved the updated cost estimate tool developed by James, Bhagat, and Andreasen for distribution interconnection project facility studies in DEP. In Q3 2019, Reynolds directed DEP Account Management to work with Distribution Planning and Distributed Generation to apply the updated cost estimate tool to DEP distribution interconnection projects in construction and subsequently provide updated cost estimate notices to this subset of projects

(8) George Flowers

- *Department:* Interconnection DEP (DET Account Management)
- *Company Role:* Renewable Contract Analyst
- *Investigation Role:* In Q3 2019, Flowers acted on direction received from Reynolds to work with Distribution Planning and Distributed Generation to apply the updated cost estimate tool to DEP distribution interconnection projects in construction. In Q4 2019, Flowers acted on direction received from Reynolds to provide updated cost estimate notices to this subset of projects

(9) Jack McNeil

- *Department:* Major Projects CARs (Distribution Management)
- *Company Role:* Director, Asset Management
- *Investigation Role:* In Q1 2019, McNeil reviewed an early version of James' updated cost estimate tool based on cost data collected by James and Flowers from previously prepared and delivered final accounting reports. In Q2 2019, McNeil directed Bhagat to assist James with development and subsequent adoption of the updated cost estimate tool for distribution interconnection project facility studies in DEP and DEC. Later in Q2 2019, McNeil reviewed and approved the updated cost estimate tool developed by James, Bhagat, and Andreasen for distribution interconnection project facility studies in DEP and DEC. In Q3 2019, McNeil directed Distributed Generation to work with Distribution Planning, DET Management, and DET Account Management to apply the updated cost estimate tool to DEP and DEC distribution interconnection projects in construction.

(10) Neil Bhagat

- *Department:* Asset Management CARs East (Distributed Generation)
- *Company Role:* Manager, Asset Management
- *Investigation Role:* In Q1 2019, Bhagat reviewed an early version of James' updated cost estimate tool based on cost data collected by James and Flowers from previously prepared and delivered final accounting reports. In Q2 2019, Bhagat acted on direction received from McNeil to assist James with development and subsequent adoption of the updated cost estimate tool for distribution interconnection project facility studies in DEP and DEC. At this same time, Bhagat directed Andreasen to also assist James with development and subsequent adoption of the updated cost estimate tool for distribution interconnection project facility studies in DEP and DEC. In Q3 2019, Bhagat acted on direction received from McNeil to work with Andreasen, Distribution Planning, DET

Management, and DET Account Management to apply the updated cost estimate tool to DEP and DEC distribution interconnection projects in construction.

(11) Jack Andreasen

- *Department:* Reliability Eng Car DG (Distributed Generation)
- *Company Role:* Engineering Design Associate
- *Investigation Role:* In Q2 2019, Andreasen acted on direction received from Bhagat to assist James with development and subsequent adoption of the updated cost estimate tool for distribution interconnection project facility studies in DEP and DEC. In Q3 2019, Andreasen trained Distribution Planners on how to apply the updated cost estimate tool to distribution interconnection project facility study results. In Q3 2019, Andresen acted on direction received from McNeil and worked with Bhagat, Distribution Planning, DET Management, and DET Account Management to apply the updated cost estimate tool to DEP and DEC distribution interconnection projects in construction.

Sponsor: George Flowers, Renewable Contract Analyst, Interconnection DEP; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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DUKE ENERGY PROGRESS, LLC

Request:

15. Identify all actions taken by DEP during the period January 1, 2015, to the present, which support DEP's contention that "it has proactively sought to update its cost estimating methodology to better reflect actual costs." Include in this response identification of any events or meetings with third parties you participated in relating to your efforts to update your cost estimating methodology.

Response:

DEP objects to the temporal scope of this request for "all actions taken by DEP during the period January 1, 2015, to the present" as overbroad, unduly burdensome and because actions taken by DEP prior to the date that Williams Solar submitted its Interconnection Request are not relevant and outside the scope of this proceeding, to address the cost estimating methodology and procedures employed by DEP to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Q1 2018

In Q1 2018, DET Management directed DET Process to further investigate observed discrepancies between estimated construction costs and actual construction costs for distribution interconnection projects coming online during Q4 2017.

Q2 – Q3 2018

DET Management, DET Governance & Process, DET Account Management held meetings to review additional evidenced differences between estimated construction costs listed in project IAs and actual construction costs.

Q4 2018

DET Governance & Process began to explore improvements to existing estimate tools utilized for estimates provided prior to construction.

Q1 2019

DET Governance & Process review potential updates to the cost estimate tool with Distribution Management and Distributed Generation. The tool was developed for use during the facility study phase of the interconnection study process for DEP and DEC distribution projects going forward. The updated cost estimate tool applied a multivariate analysis to accounting data documenting cost differences between estimates and actuals for 100+ vintage 2015-2018 commercially operating distribution interconnection projects in DEP and DEC.

Q2 2019

DET Governance & Process and Distributed Generation performed final tests and began receiving necessary internal approvals to utilize the updated cost estimate tool for distribution project facility studies in DEP and DEC.

Q3 2019

DET Governance & Process and Distributed Generation received final approvals and instruction from Distribution Management to ensure that the updated cost estimate tool was utilized for all interconnection facility studies conducted in DEP and DEC for distribution projects going forward. After DET Governance & Process and Distributed Generation trained Distribution planners on how to use the updated cost estimate tool, the planners began to use the updated cost estimate tool for all distribution project facility studies in DEP (starting July 30, 2019) and DEC (starting August 2, 2019).

Shortly after the updated cost estimate tool was approved for use during the facility study phase of the interconnection process for DEP and DEC distribution projects, DET Governance & Process, DET Management, Distribution Management, and Distributed Generation collected pertinent study and cost data for DEP and DEC distribution projects in construction and applied the updated cost estimate tool to those projects.

Q4 2019

After applying the updated cost estimate tool to pertinent study and cost data for DEP and DEC distribution projects in construction, DET Governance & Process, DET Management, DET Account Management, Distribution Management, Distribution Planning, and Distributed Generation coordinated efforts to deliver updated cost estimate notices to those projects.

Q1 2020

DET continues to actively monitor and assess estimated and actual costs for scopes of work involved in constructing distribution generator interconnection projects.

Sponsor: George Flowers, Renewable Contract Analyst, Interconnection DEP, Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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DUKE ENERGY PROGRESS, LLC

Request:

16. Identify in detail the specific source(s) of the increase in the estimate of Williams Solar's System Upgrade costs from the system impact study to the facilities study. As part of your response, identify all documents evidencing or relating to the specific increases in the estimate of Williams Solar's System Upgrade costs from the system impact study to the facilities study.

Response:

Please see DEP's response to Request Nos. 1-1 and 1-2.

Sponsor: Neil Bhagat, Manager, Asset Management/Distributed Generation, Duke Energy/
Beckton James, Senior Business and Technical Consultant, Duke Energy

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Williams Solar Data Request No. 1
Item No. 1-17
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DUKE ENERGY PROGRESS, LLC

Request:

17. For each interconnection request for which DEP has provided a revised estimate of system upgrade and/or interconnection facilities costs since January 1, 2019, please identify (a) the date of the initial estimate; (b) the amount of such costs initially estimated; (c) the date of the revised estimate; (d) the amount of the revised estimate; (e) the date of the system impact study for such project; (f) the date of the facilities study for such project; and (g) the date DEP offered an interconnection agreement for such project.

Response:

Please see the file labeled “CONFIDENTIAL DR No. 1-17 Williams Solar.xls,” provided in response to Request for Production No. 1-1.

DEP will produce this information subject to a mutually-agreeable confidentiality agreement between DEP and Williams Solar. DEP has redacted all Interconnection Customer-identifiable information as confidential and/or proprietary and not subject to disclosure under the North Carolina Interconnection Procedures.

Sponsor: George Flowers, Contract Analyst, Interconnection DEP, Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Beckton James, Senior Business and Technical Consultant, Duke Energy; Scott Jennings, Director, Customer Delivery Area Operations; Brian Dale, Engineer III, Asset Management Distributed Generation

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DUKE ENERGY PROGRESS, LLC

Request:

18. State whether DEP generated any estimate of the costs of the system upgrades or interconnection facilities for Williams Solar's interconnection request that was not provided to Williams Solar (including, without limitation, any DEP-internal estimate), and, if so, identify the date of the estimate and the amount of the estimate. As part of your response, identify all documents evidencing or relating to such estimate.

Response:

During the Facilities Study process, DEP developed multiple preliminary iterations of cost estimates prior to a final estimate being provided to Williams Solar. These iterations were based on design review feedback and clarification on protective device design requirements and were immaterial (~1% change) to the final cost estimate provided to Williams Solar in Facilities Study. There were not any scope changes of material significance identified at any time during the Facilities Study design process.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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Williams Solar Data Request No. 1
Item No. 1-19
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DUKE ENERGY PROGRESS, LLC

Request:

19. For the Williams Solar System Impact Study and for every document produced in response to Document Request 8, describe in detail the meaning, derivation, and purpose of the phrase “ihateyou” as it relates to that document. As part of this response, identify the person who created the document and their position with the company.

Response:

This phrase was generated by an external contractor at Pike Engineering, who at the time was conducting the Williams Solar DER interconnection study for Duke Energy. Duke Energy has communicated the inappropriate and unprofessional nature of the filename to management at Pike Engineering, who is investigating the incident. Pike Engineering has advised that the individual responsible for the file name is no longer working on projects related to DEP distributed generation interconnection studies.

Sponsor: Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP, Neil Bhagat, Manager, Asset Management/Distributed Generation

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DUKE ENERGY PROGRESS, LLC

Request:

20. For the period from January 1, 2015 to the present, provide a trend comparison of line-item cost assumptions by quarter for each type listed in the Williams Solar system upgrades and interconnection facilities estimates.

Response:

DEP objects to this request on the grounds that it requires DEP to perform original work and requests information not readily attainable as DEP does not generate in the ordinary course “a trend comparison of line-item cost assumptions by quarter for each type listed in the Williams Solar system upgrades and interconnection facilities estimates.”

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Trending of material related costs are not available, as these are updated in real time throughout the year based on system average costs driven by purchases and other supply chain transactions. Trending of labor rates and labor overheads is supplied in response to Data Request Nos. 21 and 22.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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Williams Solar Data Request No. 1
Item No. 1-21
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DUKE ENERGY PROGRESS, LLC

Request:

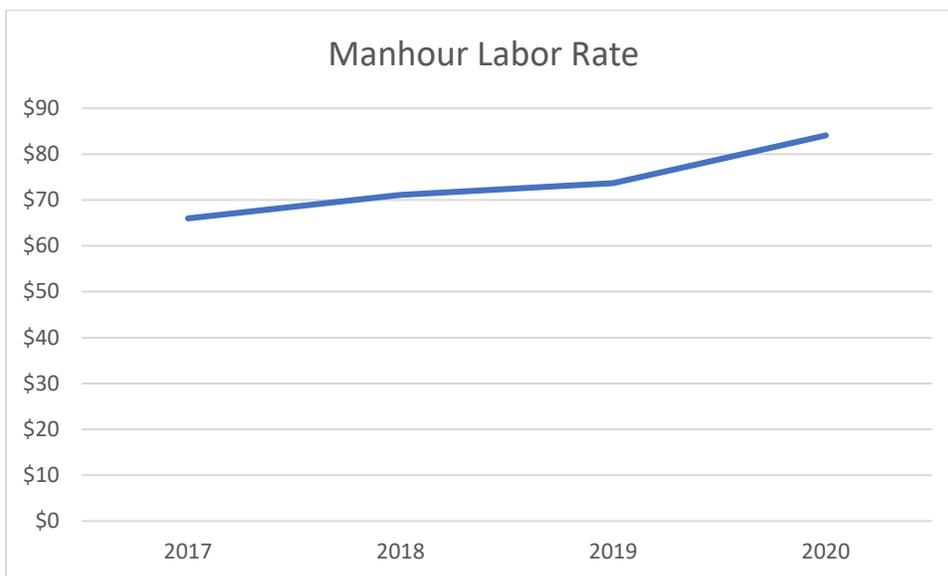
21. For the period from January 1, 2015 to the present, provide a trend comparison of labor cost assumptions for each type of cost listed in the Williams Solar system upgrades and interconnection facilities estimates.

Response:

DEP objects to the temporal scope of this request for information “from January 1, 2015 to the present” and further objects on the grounds that it requires DEP to perform original work and requests information not readily attainable as DEP does not generate in the ordinary course “a trend comparison of cost assumptions for each type of cost listed in the Williams Solar system upgrades and interconnection facilities estimates.”

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Due to change in work management systems, data is only available for 2017 forward. Labor cost is estimated using a standard rate in Maximo which reflects a weighted average manhour cost for labor and equipment to perform overhead construction work.



Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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Williams Solar Data Request No. 1
Item No. 1-22
Page 1 of 1**DUKE ENERGY PROGRESS, LLC****Request:**

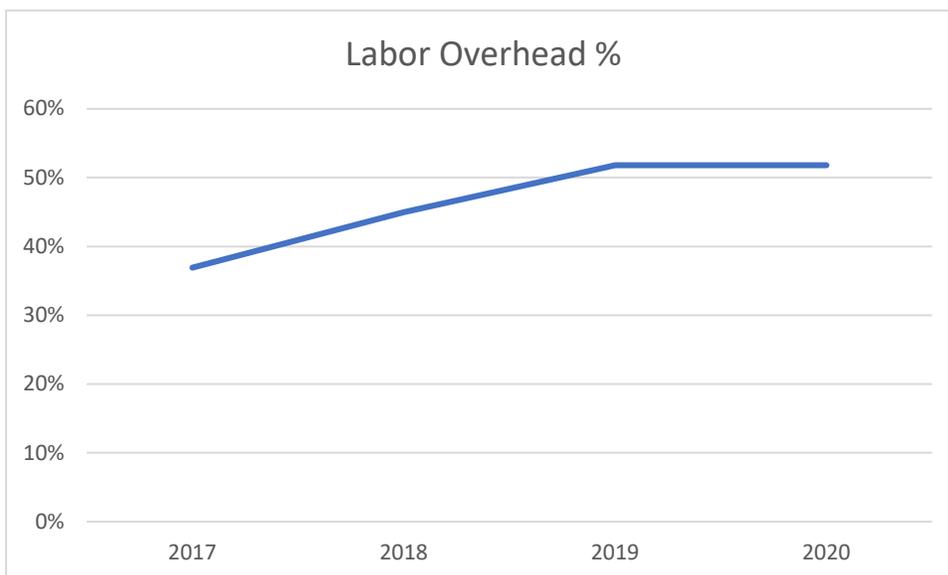
22. For the period from January 1, 2015 to the present, provide a trend comparison of overhead allocation cost assumptions per quarter.

Response:

DEP objects to the temporal scope of this request for information “from January 1, 2015 to the present” and further objects on the grounds that it requires DEP to perform original work and requests information not readily attainable as DEP does not generate, or have any obligation to generate, “a trend comparison of overhead cost assumptions per quarter.”

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Due to change in work management systems, data is only available for 2017 forward. Labor overheads are estimated as a fixed percentage associated to the manhour labor rate, and are calculated by the Duke Finance organization on an annual basis. The source file associated with the below graph as well as the graph provided in response to Data Request No. 1-21 is provided in response to Request for Production No. 1-1, labeled “DR No. 1-22 and 1-23 MaximoLaborRates_Historical.xls”



Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

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Williams Solar Data Request No. 1
Item No. 1-23
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DUKE ENERGY PROGRESS, LLC

Request:

23. For the period from January 1, 2015 to the present, provide an organization chart and any changes over time for the department(s) responsible for estimating costs for standard offer projects interconnected in distribution system.

Response:

DEP objects to the temporal scope of this request for information “the period from January 1, 2015, to the present” as overbroad, unduly burdensome and because DEP’s “organization chart and any changes over time for the department(s) responsible for estimating costs for standard offer projects interconnected in distribution system” prior to the date that Williams Solar submitted its Interconnection Request to DEP is not relevant and outside the scope of this proceeding, as such efforts did not impact the procedures DEP employed to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

Please see the documents labeled “DR No. 1-23 DET Org 2015 to 2020.xlsx” and “DR No. 1-23 Org 1-1-2020” provided in response to Request for Production No. 1-1.

Sponsor: Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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Item No. 1-1
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DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

1. Produce all documents and data identified in response to the foregoing interrogatories.

Response:

Duke objects to Complainant's request for the production of "all documents and data" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of this Response are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-1" on the FTP site in response to this request.

Sponsor: See interrogatories.

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Williams Solar RFP No. 1
Item No. 1-2
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DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

2. Produce all documents and data generated in the process of creating the Preliminary Estimated Upgrade Charge for Williams Solar.

Response:

Duke objects to Complainant's request for the production of "all documents and data" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify Company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-2" on the FTP site in response to this request.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Neil Bhagat, Manager, Asset Management/Distributed Generation

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Williams Solar RFP No. 1
Item No. 1-3
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DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

3. Produce all documents and data generated in the process of creating the System Upgrades and Interconnection Facilities costs for Williams Solar.

Response:

Duke objects to Complainant's request for the production of "all documents and data" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents provided in response to Request for Production No. 1-2 in response to this request.

Sponsor: Beckton James, Senior Business and Technical Consultant, Duke Energy; Scott Jennings, Director, Customer Delivery Area Operations; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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Williams Solar RFP No. 1
Item No. 1-4
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DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

4. Produce all documents and data (including, without limitation, communications, reports, and presentations) evidencing, reflecting, or discussing the investigation referred to in DEP's Answer and Motion to Dismiss.

Response:

Duke objects to Complainant's request for the production of "all documents and data" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-4" on the FTP site in response to this request.

Sponsor: Beckton James, Senior Business and Technical Consultant, Duke Energy; Neil Bhagat, Manager, Asset Management/Distributed Generation, Duke Energy; George Flowers, Account Manager, Interconnection; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Jeff Riggins, Director, Standard PPAs & Interconnects; Donna Massengill, Manager, Renewable Energy Contracts & Process Governance.

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Williams Solar RFP No. 1
Item No. 1-5
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DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

5. Produce all documents evidencing any written policy, guidelines, procedures, or methodologies of DEP in effect during the period January 1, 2015 to the present, relating to the generation of estimated costs for system upgrades or interconnection facilities in connection with system impact studies.

Response:

Duke objects to Complainant's request for the production of "all documents" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

DEP further objects to the temporal scope of this request for "all documents evidencing any written policy, guidelines, procedures, or methodologies of DEP in effect during the period from January 1, 2015, to the present" as overbroad, unduly burdensome and because DEP's "written policy, guidelines, procedures, or methodologies of DEP in effect" prior to the date that Williams Solar submitted its Interconnection Request to DEP are not relevant and outside the scope of this proceeding, as such policies and procedures did not impact the procedures DEP employed to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-5" on the FTP site in response to this request.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Neil Bhagat, Manager, Asset Management/Distributed Generation; Jack McNeil, Director, Asset Management; Dmitri Moundous, Senior Engineer, Asset Management/Distributed Generation

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Williams Solar RFP No. 1
Item No. 1-6
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

6. Produce all documents evidencing any written policy, guidelines, procedures, or methodologies of DEP in effect during the period January 1, 2015 to the present, relating to the generation of estimated costs for system upgrades or interconnection facilities in connection with a facilities study, including, without limitation, any policy, guideline, procedure, or methodology regarding the use of Maximo in producing such estimates.

Response:

Duke objects to Complainant's request for the production of "all documents" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

DEP further objects to the temporal scope of this request for "all documents evidencing any written policy, guidelines, procedures, or methodologies of DEP in effect during the period from January 1, 2015, to the present" as overbroad, unduly burdensome and because DEP's "written policy, guidelines, procedures, or methodologies of DEP in effect" prior to the date that Williams Solar submitted its Interconnection Request to DEP are not relevant and outside the scope of this proceeding, as such policies and procedures did not impact the procedures DEP employed to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-6" on the FTP site in response to this request.

Sponsors: Scott Jennings, Director, Customer Delivery Area Operations; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Beckton James, Senior Business and Technical Consultant

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Williams Solar RFP No. 1
Item No. 1-7
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

7. Produce all documents evidencing any written policy, guidelines, procedures, or methodologies of DEP in effect during the period January 1, 2015 to the present, relating to the generation of estimated costs for system upgrades or interconnection facilities in connection with interconnection requests other than the estimated costs provided to interconnection customers.

Response:

Duke objects to Complainant's request for the production of "all documents" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

DEP further objects to the temporal scope of this request for "all documents evidencing any written policy, guidelines, procedures, or methodologies of DEP in effect during the period from January 1, 2015, to the present" as overbroad, unduly burdensome and because DEP's "written policy, guidelines, procedures, or methodologies of DEP in effect" prior to the date that Williams Solar submitted its Interconnection Request to DEP are not relevant and outside the scope of this proceeding, as such policies and procedures did not impact the procedures DEP employed to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see documents produced in response to Request for Production No. 1-6.

Sponsors: Scott Jennings, Director, Customer Delivery Area Operations; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Beckton James, Senior Business and Technical Consultant

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Williams Solar RFP No. 1
Item No. 1-8
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

8. For the period from January 1, 2015 to the present, produce all documents in any format containing the phrase “ihateyou” (without the quotation marks) in the file name or in any other metadata field. For each document produced, include all reasonably accessible metadata including, without limitation, the date sent, date received, author, and recipients.

Response:

Duke objects to Complainant’s request for the production of “all documents” for the reasons more fully stated in in DEP’s General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a “sponsor” of DEP’s Response to this request are producing responsive documents in their possession.

DEP further objects to the temporal scope of this request for all documents “for the period from January 1, 2015 to the present” as overbroad, unduly burdensome and because this information is not relevant and outside the scope of this proceeding, as any such documents did not impact the procedures DEP employed to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP refers Williams Solar to the Company’s Response to Request No. 1-19.

Sponsor: Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Neil Bhagat, Manager, Asset Management/Distributed Generation

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Williams Solar RFP No. 1
Item No. 1-9
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DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

9. For the period from January 1, 2015 to the present, produce all system upgrade and interconnection facility cost estimates for distribution interconnection projects, including, without limitation, all initial cost estimates, final estimates, and final invoices for completed work.

Response:

Duke objects to Complainant's request for the production of "all documents" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

DEP objects to the temporal scope of this request for all documents for "the period from January 1, 2015, to the present" as overbroad, unduly burdensome and further objects because "all system upgrade and interconnection facility cost estimates for distribution interconnection projects, including, without limitation, all initial cost estimates, final estimates, and final invoices for completed work" for other Interconnection Customers are proprietary to such other Interconnection Customers and not relevant to the system upgrades or interconnection facilities cost estimates for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the document labeled "CONFIDENTIAL DEP Final Accounting Report Tracker Q3 2018-Current," in the folder labeled RFP No. 1-9 on the FTP site, which provides a summary of cost estimates and actual costs for those DEP projects that received a FAR.

DEP will produce this information subject to a mutually-agreeable confidentiality agreement between DEP and Williams Solar. DEP has redacted all Interconnection Customer-identifiable information as confidential and/or proprietary and not subject to disclosure under the North Carolina Interconnection Procedures.

Sponsor: George Flowers, Account Manager, Interconnection; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Beckton James, Senior Business and Technical Consultant, Duke Energy; Beckton James, Senior Business and Technical Consultant, Duke Energy; Scott Jennings, Director, Customer Delivery Area Operations

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Williams Solar RFP No. 1
Item No. 1-10
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

10. Produce all contracts for construction of interconnection facilities and system upgrades for the period January 1, 2015.

Response:

Duke objects to Complainant's request for the production of "all contracts" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

DEP objects to the temporal scope of this request for all documents for "the period from January 1, 2015" as vague, overbroad, unduly burdensome and further objects because "all construction contracts" unduly vague and ambiguous.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

DEP's master construction agreements require notice and consent to produce these Agreements. DEP is in the process of obtaining consent and anticipates supplementing this Response to produce these agreements on or before February 28, 2020. Production of these agreements shall also be subject to execution of a mutually-agreeable confidentiality agreement between DEP and Williams Solar.

Sponsor: Genevieve Bestercy, Sourcing Specialist, Transmission and Generation Grid Solutions Labor and EPC

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Williams Solar RFP No. 1
Item No. 1-11
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

DOCUMENT REQUESTS

Request for Production:

11. Produce all Williams Solar comments and communication history within Salesforce (or other data/document collection IT system) used to control data/document records, coordination, email history, etc. generated or received by Duke within the study process.

Response:

Duke objects to Complainant's request for the production of "all Williams Solar comments and communication history" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-11" on the FTP site in response to this request.

Sponsor: George Flowers, Account Manager, Interconnection; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

Dated: February 21, 2020.

/s/E. Brett Breitschwerdt

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*Attorneys for Duke Energy Progress,
LLC*

CERTIFICATE OF SERVICE

There undersigned, of the law firm McGuireWoods LLP, hereby certifies that he has served a copy of the foregoing Duke Energy Progress, LLC Responses to Williams Solar, LLC's First Data Request via electronic mail to:

Marcus Trathen
Eric M. David
Brooks, Pierce , McLendon, Humphrey, & Leonard LLP
Suite 1700, Wells Fargo Capitol Center
150 Fayetteville Street
P.O. Box 1800 (zip 27602)
Raleigh NC 27610

This the 21st day of February, 2020.

/s/E. Brett Breitschwerdt
E. Brett Breitschwerdt
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
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bbreitschwerdt@mcguirewoods.com

Attorney for Duke Energy Progress, LLC

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-7

Duke Energy Progress, LLC's,
Supplemental Responses to
Complainant's First Set of
Interrogatories and Requests for
Production of Documents

Docket No. E-2, Sub 1220
Williams Solar Data Request No. 1
Item No. 1-1
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DUKE ENERGY PROGRESS, LLC

Request:

1. Provide the entire basis for DEP's initial estimate of \$774,000, including, without limitation, an itemization of all costs included in that estimate and any overhead amounts assumed in that estimate. As part of your response, identify all documents evidencing or relating to the estimate.

Response:

Each generator interconnection project's preliminary estimated upgrade cost projections developed by DEP in the System Impact Study are calculated based on a standardized template cost estimation tool, SIS Estimate Tool Rev1, as further discussed in the Company's response to Williams Solar's Request Nos. 1-7 and 1-8. The SIS Estimate Rev1 is the most updated version of the SIS Estimate Tool Rev0. Further explanation of the process DEP uses to estimate costs is provided in DEP's response to Data Request No. 1-3.

The System Modifications project file used to generate preliminary estimated upgrade costs for Williams Solar is being produced in response to Request for Production No. 1-2, and is labeled "Williams Solar Estimation Tool SIS.xls." Labor, materials, and overhead are included in the \$774,000 estimate based on work management data available as of the issuance date of the System Impact Study report for Williams Solar.

Sponsor: Neil Bhagat, Manager, Asset Management/Distributed Generation, Duke Energy

Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, DEP clarifies its initial Response to confirm that the System Impact Study estimated costs delivered to Williams Solar were generated using SIS Estimation Tool Rev0, more specifically a template called "SIS Estimation Tool Rev0.1." In response to Williams Solar's question regarding the Williams Solar System Impact Study files produced in Request for Production No. 1-2 resembling the Rev1 file and not the Rev0 file, cosmetic changes were made to "SIS Estimation Tool Rev0" by Pike Engineering to make the spreadsheet more user friendly. These can be seen in the spreadsheet template titled "SIS Estimation Tool Rev0.1" now being produced in response to Request for Production No. 1-2

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Item No. 1-1
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(Supplemental). The adjustment factors and line item costs are unchanged from those represented in “SIS Estimation Tool Rev0.” The “SIS Estimation Tool Rev0.1” file is the template used to create the Williams Solar System Impact Study estimate as well as all other distribution System Impact Study estimates from 2016 to June 2019. DEP is also providing additional explanation of the System Impact Study files produced in a supplemental response to Request for Production No. 1-2.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation

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DUKE ENERGY PROGRESS, LLC

Request:

3. With respect to the cost data relied upon by DEP in generating cost estimates for interconnection customers, state (a) how the cost data were estimated, (b) who performed the estimation, and (c) whether they reflect competitive bidding prices for parts, equipment, and labor.

Response:

Generator Interconnection cost estimates are generated in two phases corresponding to the System Impact Study and Facilities Study processes:

First, the System Impact Study estimated cost are based on reviewing the upgrades identified in the System Impact Study Report with the existing conditions and any current proposed non-DER upgrades in the DEP Graphical Information System (GIS) and a per mile cost estimation sheet. The SIS Estimation Tool Rev0 (which is being produced in DEP's response to Request for Production of Documents No. 5), has typical system upgrade project cost estimates on a per mile basis. These estimated cost data inputs to the cost estimate sheet were developed by the Capacity Planning Department based on overhead distribution line construction completed in DEP on a per mile cost basis. This cost estimation sheet is utilized to estimate costs for both internal overhead distribution line construction projects, as well as System Impact Study estimates for generator interconnections. The Capacity Planning Department also more recently developed the SIS Estimation Tool Rev0 based on completed projects. The cost data relied upon by DEP in generating cost estimates in the cost estimate tool is based upon the following categories of procured costs:

- a. Overhead Contractors (Labor/Equipment) – The contractors completing those projects were selected on a competitive basis and were required to satisfy DEP's qualifications including safety, construction quality, presence in our region, ability to scale, cost and other factors.
- b. Material/Parts – Duke obtains competitive pricing for material purchases and performs a technical and commercial evaluation to determine the best overall evaluated pricing to select an approved supplier or in many cases multiple suppliers. Duke periodically reviews market conditions to assess indices relative to raw material cost and perform cost modeling for approved price adjustments.
- c. Engineering Labor - Pike Engineering is an engineering contractor for both Duke Energy Progress and Duke Energy Carolinas. Their rates for engineering labor were competitively bid.

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Second, the detailed cost estimate provided in the Facilities Study is developed by Duke's Major Projects design organization, either by a Duke Energy Engineering Technologist, or by an offsite contract engineering partner such as Pike Engineering, with final review by a Duke Energy Engineering Technologist. This design process is completed in Maximo, which is used in conjunction with a MicroStation based graphical design tool, Bentley Open Utilities Designer (BOUD), for the development of schedulable tasks, bills of material, and cost estimates. This process is used for all types of Distribution construction work, including Customer Additions, Capital Maintenance, System Improvements, as well as generator interconnections. Compatible units are used as the basis for the design process, specifically for purposes of developing an estimate of the materials and labor hours required to perform the scope of work for a given design.

DEP began using the Maximo and BOUD tools for work order design and estimation in November 2017. Prior to this date, DEP used a similar system called Work Management Information System (WMIS), developed by CGI, for the same purposes. WMIS also utilized a compatible unit process in order to develop estimates of material and labor hours.

In both systems, the process of using compatible units to develop the design and cost estimate involves selection of compatible units, which represent the scope of work being performed. The compatible unit library used in both systems contained a combination of material only compatible units, labor only compatible units, and combination material/labor compatible units. The selection process for compatible units is based on the currently published Distribution Standards manual, which specifies the materials and equipment used for approved styles of installations.

Most compatible units on a design are associated with primary material items used, such as poles, conductor, switches, etc. Each of these compatible units captures what material item numbers and how many labor hours are required to perform the work associated with the compatible unit. Material only compatible units are less common, and associated with minor items such as hardware and connectors in which the labor hours are associated with a higher-level compatible unit. Finally, labor only compatible units are added to a design to capture anticipated labor time that is not reflected in a material only compatible units. Examples of labor-only compatible units are hand digging for poles or anchors, transferring conductor, and laying wire out for reconductors.

In addition to the material and labor compatible units noted above, designers have an opportunity to include "cost adder" compatible units to account for unique costs not associated with standard construction. Examples of when cost adder compatible units might be used are environmental permitting, controls and/or remediation, or other civil work such as asphalt/concrete removal or remediation.

Once a designer has tabulated the list of compatible units associated with a design for the given scope of work, they perform a step called "estimation" which calculates the total material and labor costs for the design. The design cost estimate is based on the following components: direct material

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costs, material overheads, direct labor costs, and labor overheads. Labor costs are described in more detail in the Company's responses to Request Nos. 1-4 and 1-10. Material costs are estimated based on near real-time system average costs. Duke obtains competitive pricing for material purchases and performs both a technical and commercial evaluation to determine the best overall evaluated pricing to select an approved supplier or in many cases multiple suppliers before executing contracts. Periodically, a review of market conditions is performed to assess indices relative to raw material cost and perform cost modeling for approved price adjustments.

Following development of the Maximo cost estimate, generator interconnection projects are then run through a secondary cost estimation tool, the Revised Estimating Tool ("RET"), which was developed to help provide more accurate cost to customers based on actual construction costs. A detailed explanation of this revised cost estimating tool, labeled "DR No. 1-3 Revised Estimating Tool Description – Williams Solar.doc," is being produced in Request for Production of Documents No. 1.

The RET updates the existing cost produced in Maximo to more accurately reflect total project costs Duke will likely incur from completion of Facilities Study through completion of interconnection-related project construction. The primary adjustments made by the RET are accounting for increased future costs by projecting inflation-impacted labor, material and equipment costs, modeling more likely resourcing and equipment requirements and adding a contingency factor for unforeseen events that have historically increased costs for generator interconnection projects.

Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, DEP clarifies its initial Response to explain that the document labeled "DR No. 1-3 Revised Estimating Tool Description – Williams Solar.doc," was not the actual System Impact Study output file created by Pike Engineering for Williams Solar. The actual System Impact Study output files were initially produced in response to Request for Production No. 1-2 and are further explained in DEP's Supplemental Response to Request for Production No. 1-2.

Further, the difference between the estimated Interconnection Facilities costs identified in "DR No. 1-3 Revised Estimating Tool Description – Williams Solar.doc" (\$121,024) and the \$196,495 identified in Williams Solar's System Impact Study Report are primarily attributable to metering, commissioning costs, overheads and taxes being separately identified in DR No. 1-3 Revised Estimating Tool Description – Williams Solar.doc but included in the total Interconnection Facilities cost figure of \$196,495, as provided below. DEP has also determined that a minor discrepancy in flagging was incorrectly added in the Revised Estimating Tool calculation of Interconnection Facilities costs presented in DR No. 1-3 Revised Estimating Tool

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Description – Williams Solar.doc. The Revised Estimating Tool Description should have shown \$116,419 as a baseline Interconnection Facilities construction cost estimate.

The table below explains the difference between \$116,419 and \$196,495.

Item Description	Estimated Installed Cost
1. Estimated Construction cost	\$116,419.10
2. Estimated Metering cost	\$25,097.51
3. Standard Metering Cost Credit	\$(306.21)
4. Subtotal of Estimated Interconnection Facilities	\$141,210.40
5. Applicable NC Utility Sales Tax (7%) to Estimated Interconnection Facilities	\$9,884.73
6. Overhead costs (processing, technology, oversight, management)	\$20,000.00
7. Applicable NC Utility Sales Tax (7%) to Overhead Costs	\$1,400.00
8. Subtotal of Taxable costs	\$172,495.13
9. Estimated NC Advanced Energy Commissioning Costs (Average = \$24,000)	\$24,000.00
10. Estimated Total of Interconnection Costs	\$196,495.13
11. Estimated Customer MFC (.4% Monthly Facilities Charge under the Contributory Plan) 7% NC Utility Sales Tax to be applied on invoice	\$564.84
12. Estimated Customer MFC (1.0% Monthly Facilities Charge under the Non-Contributory Plan) 7% NC Utility Sales Tax to be applied on invoice	\$1,412.10

Note also that the Revised Estimating Tool was not used to develop the SIS estimate provided to Williams Solar.

Finally, DEP clarifies its response to Request No. 1-3 to confirm that the Capacity Planning Department developed “SIS Estimation Tool Rev0” and provided it to Pike Engineering in 2015. This tool was created using completed distribution work orders completed prior to 2015. In June 2019, the Duke Energy Distributed Generation Team updated the spreadsheet to “SIS Estimation Tool Rev1.” This update was implemented to more accurately estimate system upgrade costs.

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Sponsors: Brian Dale, Engineer III, Asset Management Distributed Generation; Beckton James, Senior Business and Technical Consultant, Duke Energy; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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DUKE ENERGY PROGRESS, LLC

Request:

5. Describe in detail the process used to create the Preliminary Estimated Upgrade Charge provided to Williams Solar. As part of your response, identify (a) all individuals who participated or otherwise assisted in creating the Preliminary Estimated Upgrade Charge provided to Williams Solar, LLC and the role of and actions taken by such person; and (b) all documents or data reflecting or evidencing the estimate.

Response:

A study engineer is responsible for creating the Preliminary Estimated Upgrade Charge for the System Impact Study Report. The study engineer reviewed the project under the DEP's System Impact Study evaluation process, which is described in a file labeled "System Impact Study SOP.pdf" being produced in DEP's response to Request for Production of Documents No. 5. Based upon this review, the study engineer then identified necessary upgrades required to safely and reliably interconnect the Williams Solar facility. The identified upgrades were then itemized and entered into the System Impact Study cost estimation spreadsheet by the study engineer, as further described in DEP's response to Data Request No. 1-3. Within the cost estimation spreadsheet, each upgrade was assigned a cost. The total upgrades cost was then calculated.

For Williams Solar, the study engineer responsible for developing the Preliminary Estimated Upgrade Charge included in the System Impact Study Report was a Pike Engineering Employee. Duke Energy Engineers review portions of the System Impact Study and provide approval for their department. Capacity Planner Alex Winslow reviewed the voltage and RVC study. Distribution Protection and Control engineer Andrew Kurczek (Pike Engineering) reviewed the protection study. The system upgrades necessary to safely and reliably interconnection the facility are identified through the voltage, RVC, and Protection studies. The two engineers mentioned above reviewed the accuracy of the study and confirmed the preliminarily-identified upgrades are needed, but do not estimate the cost for the identified system upgrades. The standardized cost estimation tool used to generate preliminary estimated upgrade costs for Williams Solar is further described in response to Request Nos. 1-1 and 1-3, and is being produced in response to Request for Production of Documents No. 5.

Sponsor: Neil Bhagat, Manager, Asset Management/Distributed Generation; Dmitri Moundous, Senior Engineer, Asset Management/Distributed Generation

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Williams Solar Data Request No. 1
Item No. 1-5
Page 2 of 2**Supplemental Response:**

In response to Williams Solar's March 6, 2020 letter, DEP clarifies its initial Response to identify the "Pike Engineering Employee" responsible for developing the Preliminary Estimated Upgrade Charge included in the System Impact Study Report. To the best of DEP's knowledge, the following Pike engineers worked on the Williams Solar Interconnection Request and contributed approximately 90% of the work to complete the Williams Solar System Impact Study.

Name (Last, First)
Wickstrom, Nikala
Anttila, Konsta
Willin, Wade
Garcia, Eduardo
Witherspoon, Jeffrey

Sponsor: Neil Bhagat, Manager, Asset Management/Distributed Generation, Brian Dale, Engineer III, Asset Management Distributed Generation

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Williams Solar Data Request No. 1
Item No. 1-6
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DUKE ENERGY PROGRESS, LLC

Request:

6. Identify by line item type the “historic cost data for similar projects,” if any, used by DEP in developing the Preliminary Estimated Upgrade Charge. As part of your response, identify the project(s) for which such data was acquired and the period during which the upgrades for such project(s) were constructed.

Response:

The creation of the “SIS Estimation Tool Rev0” tool originated in work order designs created in the late 1990’s or early 2000’s for general distribution work. Sometime between 2000 and 2005, the work orders were converted to the Work Management Information System (WMIS) and the format of the “SIS Estimation Tool Rev0” tool was developed. Work orders were created in WMIS on various types of construction needed to complete System Improvement projects. The work orders were based upon generic work orders historically and were initially refreshed annually through a labor intensive manual process. Each year, if a new type of System Upgrade was needed, a new work order would be created to cover the need. These work orders correspond to “historic cost data for similar projects” referenced in DEP’s Answer.

In recent years, an adjustment factor was added to the SIS Estimation Tool Rev0 to increase labor costs based experienced changes in labor expense. As more time passed between the latest revision of the estimates used to feed the tool and the application of the tool, a decision was made to increase the base labor factor to keep up with rising labor charges.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Neil Bhagat, Manager, Asset Management/Distributed Generation; Jack McNeil, Director, Asset Management Dmitri Moundous, Senior Engineer, Asset Management/Distributed Generation

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Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, DEP clarifies its initial Response to confirm that adjustment factors were added prior to 2015 and in June 2019. From the time Pike Engineering received the SIS Estimation Tool Rev0 in 2015 through June 2019, no changes were made in the form of adjustment factors, or line item costs. Cosmetic changes were made for the purposes of ease of use as explained in DEP's supplemental response to Request No. 1-1; however, line item costs and adjustment factors remained the same.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation

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Williams Solar Data Request No. 1
Item No. 1-9
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DUKE ENERGY PROGRESS, LLC

Request:

9. For the period 2015 to the present, describe any difference between DEP's process for estimating costs of constructing upgrades necessary for interconnection of independent generation (i.e., PURPA qualified facilities) and DEP's process for estimating DEP's own construction costs (i.e., for system modifications including for interconnection of DEP's own generation facilities or other system modifications undertaken by DEP), including, without limitation, (a) identifying any difference in the estimation of the cost of parts, labor, and overheads; and (b) identifying any difference in the actual cost of parts, labor, overheads, and labor rates for such projects.

Response:

DEP objects to the temporal scope of this request "for the period January 1, 2015 to the present" as overbroad, unduly burdensome and because "any difference between DEP's process for estimating costs of constructing upgrades necessary for interconnection of independent generation (i.e., PURPA qualified facilities) and DEP's process for estimating DEP's own construction costs (i.e., for system modifications including for interconnection of DEP's own generation facilities or other system modifications undertaken by DEP)," having occurred prior to the date that Williams Solar submitted its Interconnection Request to DEP is not relevant and outside the scope of this proceeding, as such differences have no effect on the procedures employed by DEP to generate estimates of the cost of system upgrades or interconnection facilities for Williams Solar.

Notwithstanding the foregoing objection, DEP provides the following information in response to this request:

DEP utilizes the same design and cost estimating process (use of Maximo and common design standards) for all Distribution construction projects that is used for estimating costs of construction upgrades necessary for interconnection of independent generation (i.e. PURPA qualifying facilities) and DEP's own construction costs (i.e., for system modifications including for interconnection of DEP's own generation facilities or for customer addition, reliability improvement or other system modifications undertaken by DEP). Specifically, DEP utilizes Maximo for both independent generation and DEP-owned projects, as further described in the Company's response to Data Request No. 1-3. However, as described in DEP's response to Request No. 1-3, DEP has also integrated a generator interconnection-specific Revised Estimating Tool as part of the Facilities Study process. A similar mechanism is utilized for NCDOT requested

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Item No. 1-9
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relocations, in which a Maximo design estimate is run through a secondary estimating tool that was developed based on actual costs experienced for NCDOT requested projects.

Sponsor: Scott Jennings, Director, Customer Delivery Area Operations

Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, DEP clarifies its initial Response to confirm that DEP has used the same methodology to estimate the cost of parts, labor and overheads for all construction projects (DEP-owned generation subject to the NC Interconnection Procedures, 3rd party generation, as well as retail, commercial, industrial and governmental load customers) since January 1, 2015. Several of the tools have been changed or modified during that timeframe including the change of the work management tool from WMIS to Maximo.

Sponsor: Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP

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Item No. 1-2
Page 1 of 2**DUKE ENERGY PROGRESS, LLC****DOCUMENT REQUESTS****Request for Production:**

2. Produce all documents and data generated in the process of creating the Preliminary Estimated Upgrade Charge for Williams Solar.

Response:

Duke objects to Complainant's request for the production of "all documents and data" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify Company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-2" on the FTP site in response to this request.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Neil Bhagat, Manager, Asset Management/Distributed Generation

Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, DEP provides the following supplemental explanation of the documents produced in response to Request for Documents No. 1-2:

"CONFIDENTIAL Project 15007 System Impact Study Calculations with A" – This document was provided to show the documentation that goes into each System Impact Study. This spreadsheet is Williams Solar-specific information and is used to determine the "system modifications" (e.g., required upgrades) during the voltage and RVC portion of the System Impact Study.

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Williams Solar RFP No. 1
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“CONFIDENTIAL DEP Protection V2.4.2” – This document was provided to show the system, protection-related upgrades and provides the data that leads to those required system upgrades and associated costs identified in the System Impact Study report provided to Williams Solar.

“Williams Solar Estimation Tool SIS” – This spreadsheet is a tab saved as its own individual file taken out of the “CONFIDENTIAL Project 15007 System Impact Study Calculations with A” spreadsheet for the purposes of providing a quick look at the voltage and RVC portion cost estimation.

“CONFIDENTIAL Project 15007 System Impact Study Calculations - Project A and B 2017 (002)” – This spreadsheet was provided to show a preliminary 2017 version of the study calculations initially developed during System Impact Study. This file was superseded by the “CONFIDENTIAL Project 15007 System Impact Study Calculations with A” file used to develop the System Impact Study for Williams Solar.

Sponsor: Brian Dale, Engineer III, Asset Management Distributed Generation

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Williams Solar RFP No. 1
Item No. 1-4
Page 1 of 2**DUKE ENERGY PROGRESS, LLC****DOCUMENT REQUESTS****Request for Production:**

4. Produce all documents and data (including, without limitation, communications, reports, and presentations) evidencing, reflecting, or discussing the investigation referred to in DEP's Answer and Motion to Dismiss.

Response:

Duke objects to Complainant's request for the production of "all documents and data" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

Please see the documents in the folder labeled "RFP No. 1-4" on the FTP site in response to this request.

Sponsor: Beckton James, Senior Business and Technical Consultant, Duke Energy; Neil Bhagat, Manager, Asset Management/Distributed Generation, Duke Energy; George Flowers, Account Manager, Interconnection; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Jeff Riggins, Director, Standard PPAs & Interconnects; Donna Massengill, Manager, Renewable Energy Contracts & Process Governance.

Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, the sponsors identified in the initial Response have again reviewed their accessible documents for documents responsive to this Request. DEP has now also included all current employees identified in Response 1-14 as Sponsors in this supplemental response. DEP provides the following supplemental response to this request:

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Please see the documents in the folder labeled “RFP No. 1-4 (Supplemental)” on the FTP site.

Sponsor: Beckton James, Senior Business and Technical Consultant, Duke Energy; Neil Bhagat, Manager, Asset Management/Distributed Generation, Duke Energy; George Flowers, Account Manager, Interconnection; Scott Reynolds, Manager of Interconnections and Standard PPAs, DEP; Jeff Riggins, Director, Standard PPAs & Interconnects; Donna Massengill, Manager, Renewable Energy Contracts & Process Governance; Ken Jennings, General Manager, DET Renewable Integration and Operations, Scott, Jennings, Customer Delivery Area Operations, Jack McNeil, Director, Asset Management, Jack Andreasen, Engineering Design Associate

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Williams Solar RFP No. 1
Item No. 1-10
Page 1 of 2**DUKE ENERGY PROGRESS, LLC****DOCUMENT REQUESTS****Request for Production:**

10. Produce all contracts for construction of interconnection facilities and system upgrades for the period January 1, 2015.

Response:

Duke objects to Complainant's request for the production of "all contracts" for the reasons more fully stated in DEP's General Objection No. 5. Duke has undertaken reasonable efforts to identify company personnel with knowledge of, or otherwise likely to have custody of documents responsive to this Request and the individual(s) identified as a "sponsor" of DEP's Response to this request are producing responsive documents in their possession.

DEP objects to the temporal scope of this request for all documents for "the period from January 1, 2015" as vague, overbroad, unduly burdensome and further objects because "all construction contracts" unduly vague and ambiguous.

Notwithstanding the foregoing objection, DEP provides the following documents in response to this request:

DEP's master construction agreements require notice and consent to produce these Agreements. DEP is in the process of obtaining consent and anticipates supplementing this Response to produce these agreements on or before February 28, 2020. Production of these agreements shall also be subject to execution of a mutually-agreeable confidentiality agreement between DEP and Williams Solar.

Sponsor: Genevieve Bestercy, Sourcing Specialist, Transmission and Generation Grid Solutions Labor and EPC

Supplemental Response:

Please see DEP's operative master construction agreements and supporting agreements being produced in response to Request for Production No. 1-10. Pursuant to the Confidentiality Agreement dated February 21, 2020 between DEP and Williams Solar, the Company has redacted pricing information that would otherwise be designated as Highly Confidential Information.

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Item No. 1-10
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Sponsor: Genevieve Bestercy, Sourcing Specialist, Transmission and Generation Grid Solutions Labor and EPC

Second Supplemental Response:

In response to Williams Solar's March 6, 2020 letter, DEP is producing unredacted copies of the Company's operative master construction agreements and supporting agreements as CONFIDENTIAL documents in response to Request for Production No. 1-10, pursuant to the Confidentiality Agreement dated February 21, 2020 between DEP and Williams Solar.

Sponsor: Genevieve Bestercy, Sourcing Specialist, Transmission and Generation Grid Solutions Labor and EPC; Brett Breitschwerdt, McGuireWoods LLP

In providing the foregoing Supplemental Responses, DEP reserves and does not waive the right to further supplement or amend its responses as may be necessary.

Dated: March 20, 2020.

/s/E. Brett Breitschwerdt
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LLC*

CERTIFICATE OF SERVICE

There undersigned, of the law firm McGuireWoods LLP, hereby certifies that he has served a copy of the foregoing Duke Energy Progress, LLC's Supplemental Responses to Williams Solar, LLC's First Data Request via electronic mail to:

Marcus Trathen
Eric M. David
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This the 20th Day of March, 2020.

/s/E. Brett Breitschwerdt

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Attorney for Duke Energy Progress, LLC

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-8

Williams Solar Estimation Tool
SIS.xlsx

PUBLIC VERSION

#	Action	From DIS#	To DIS#	Distance (Miles)	Existing # of phases	Existing Conductor	New # of phases	New Conductor	Estimated Cost	Description				
1	Reconductor	2M845	2M843	0.0775	1	#2 ACSR	3	477 AAC	\$20,970.58	Upgrade 0.0775 miles of existing 1-phase #2 ACSR to 3-phase 477 AAC with 1/0 AAAC neutral from DIS# 2M845 to DIS# 2M843.	3	4	7	Reconductor #2 ACSR 477 AAC
2	Reconductor	2M843	2M803	1.342	1	#4 BC	3	477 AAC	\$358,173.00	Upgrade 1.342 miles of existing 1-phase #4 BC to 3-phase 477 AAC with 1/0 AAAC neutral from DIS# 2M843 to DIS# 2M803.	3	6	7	Reconductor #4 BC 477 AAC
3	Reconductor	2M803	2L653	1.114	3	#2 ACSR	3	477 AAC	\$325,046.18	Upgrade 1.114 miles of existing 3-phase #2 ACSR to 3-phase 477 AAC with 1/0 AAAC neutral from DIS# 2M803 to DIS# 2L653.	3	4	7	Reconductor #2 ACSR 477 AAC
4	None					None		None	\$0.00		1	1	1	None None
5	None					None		None	\$0.00		1	1	1	None None
6	None					None		None	\$0.00		1	1	1	None None
7	None					None		None	\$0.00		1	1	1	None None
8	None					None		None	\$0.00		1	1	1	None None
9	None					None		None	\$0.00		1	1	1	None None
10	None					None		None	\$0.00		1	1	1	None None

Total Cost Estimate: \$704,189.76

Library

Code	Actions	Conductor Types
1	None	None
2	Build New Line	1/0 ACSR
3	Reconductor	4/0 ACSR
4	Double Circuit	#2 ACSR
5	Triple Circuit	#2 BC
6	Add G&W at Takeoff	#4 BC
7	Verify for High Capacity	477 AAC
8		750 MCM Underground
9		
10		
11		

Neutral Conductor: 1/0 AAAC

Pricing

Action	Existing # of phases	Existing Conductor	New # of phases	New Conductor	\$/mile	Equipment	\$/unit
Build New Line	0	None	3	477 AAC	\$256,036.99		
Reconductor	1	1/0 ACSR	3	477 AAC	\$247,683.87	G&W Electronic Recloser	\$39,091.36
Reconductor	1	4/0 ACSR	3	477 AAC			
Reconductor	1	#2 ACSR	3	477 AAC	\$270,588.16		
Reconductor	1	#2 BC	3	477 AAC			
Reconductor	1	#4 BC	3	477 AAC	\$266,894.93		
Reconductor	1	477 AAC	3	477 AAC			
Reconductor	2	1/0 ACSR	3	477 AAC	\$246,100.45		
Reconductor	2	4/0 ACSR	3	477 AAC			
Reconductor	2	#2 ACSR	3	477 AAC	\$268,988.30		
Reconductor	2	#2 BC	3	477 AAC			
Reconductor	2	#4 BC	3	477 AAC	\$272,815.38		
Reconductor	2	477 AAC	3	477 AAC			
Reconductor	3	1/0 ACSR	3	477 AAC	\$250,342.87		
Reconductor	3	4/0 ACSR	3	477 AAC	\$250,432.94		
Reconductor	3	#2 ACSR	3	477 AAC	\$291,782.93		
Reconductor	3	#2 BC	3	477 AAC	\$291,782.93		
Reconductor	3	#4 BC	3	477 AAC	\$291,602.78		
Double Circuit	1	1/0 ACSR	3	477 AAC	\$439,389.13		
Double Circuit	1	4/0 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	1	#2 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	1	#2 BC	3	477 AAC	\$447,727.68		
Double Circuit	1	#4 BC	3	477 AAC	\$447,727.68		
Double Circuit	1	477 AAC	3	477 AAC	\$447,727.68		
Double Circuit	2	1/0 ACSR	3	477 AAC	\$439,389.13		
Double Circuit	2	4/0 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	2	#2 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	2	#2 BC	3	477 AAC	\$447,727.68		
Double Circuit	2	#4 BC	3	477 AAC	\$447,727.68		
Double Circuit	2	477 AAC	3	477 AAC	\$447,727.68		
Double Circuit	3	1/0 ACSR	3	477 AAC	\$439,389.13		
Double Circuit	3	4/0 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	3	#2 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	3	#2 BC	3	477 AAC	\$447,727.68		
Double Circuit	3	#4 BC	3	477 AAC	\$447,727.68		
Double Circuit	3	477 AAC	3	477 AAC	\$447,727.68		
Triple Circuit	1	1/0 ACSR	3	477 AAC	\$570,000.00		
Triple Circuit	1	4/0 ACSR	3	477 AAC	\$570,000.00		
Triple Circuit	1	#2 ACSR	3	477 AAC	\$570,000.00		
Triple Circuit	1	#2 BC	3	477 AAC	\$570,000.00		
Triple Circuit	1	#4 BC	3	477 AAC	\$570,000.00		

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Triple Circuit	1	477 AAC	3	477 AAC	\$570,000.00
Triple Circuit	2	1/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	2	4/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	2	#2 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	2	#2 BC	3	477 AAC	\$570,000.00
Triple Circuit	2	#4 BC	3	477 AAC	\$570,000.00
Triple Circuit	2	477 AAC	3	477 AAC	\$570,000.00
Triple Circuit	3	1/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	3	4/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	3	#2 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	3	#2 BC	3	477 AAC	\$570,000.00
Triple Circuit	3	#4 BC	3	477 AAC	\$570,000.00
Triple Circuit	3	477 AAC	3	477 AAC	\$570,000.00
Verify for High Capacity	3	477 AAC	0	None	\$50,000.00
Double Circuit	0	MCM Undergro	3	MCM Undergro	\$500,323.77
Build New Line	0	None	3	MCM Undergro	\$500,323.77

393 2M264__1775713	393 2M264__1775713	OVERHEAD	2M264	10	1105	1115 -
394 17EX15__104223503	394 17EX15__104223503	OVERHEAD	17EX15	10	1120	1130 -
395 2M252__1776994	395 2M252__1776994	OVERHEAD	2M252	10	1125	1135 -
396 2M249__1710270	396 2M249__1710270	OVERHEAD	2M249	10	1144	1155 -
397 2M246__1710268	397 2M246__1710268	OVERHEAD	2M246	10	1164	1175 -
398 2M243__1710266	398 2M243__1710266	OVERHEAD	2M243	10	1169	1180 -
399 2M241__1710265	399 2M241__1710265	OVERHEAD	2M241	10	1175	1186 -
400 2M239__1710264	400 2M239__1710264	OVERHEAD	2M239	10	1183	1195 -
401 2M236__1710263	401 2M236__1710263	OVERHEAD	2M236	10	1200	1211 -
402 2M234__1710274	402 2M234__1710274	OVERHEAD	2M234	10	1206	1218 -
452 2M690__1710234	452 2M690__1710234	OVERHEAD	2M690	10	914	921 -
455 2N733__1710235	455 2N733__1710235	OVERHEAD	2N733	10	906	912 -
456 2M689__1710233	456 2M689__1710233	OVERHEAD	2M689	10	920	927 -
461 1BTC29__111726490	461 1BTC29__111726490	OVERHEAD	1BTC29	10	912	918 -
462 15NA10__103841825	462 15NA10__103841825	OVERHEAD	15NA10	10	916	923 -
467 2M584__1710243	467 2M584__1710243	OVERHEAD	2M584	10	931	938 -
520 2M309__1710449	520 2M309__1710449	OVERHEAD	2M309	10	635	638 -
523 2M311__1764311	523 2M311__1764311	OVERHEAD	2M311	10	641	644 -
524 2M387__1710448	524 2M387__1710448	OVERHEAD	2M387	10	646	649 -
529 2M396__1710483	529 2M396__1710483	OVERHEAD	2M396	10	638	641 -
530 2M390__1710441	530 2M390__1710441	OVERHEAD	2M390	10	658	661 -
531 2M398__1710482	531 2M398__1710482	OVERHEAD	2M398	10	668	671 -
534 2M428__1764045	534 2M428__1764045	OVERHEAD	2M428	10	685	688 -
535 2M433__1710479	535 2M433__1710479	OVERHEAD	2M433	10	706	710 -
547 136416__1780091	547 136416__1780091	OVERHEAD	136416	10	687	691 -
548 136415__103358361	548 136415__103358361	OVERHEAD	136415	10	691	695 -
549 136412__1783196	549 136412__1783196	OVERHEAD	136412	10	698	702 -
556 2M675__1710503	556 2M675__1710503	OVERHEAD	2M675	10	672	676 -
562 2M681__1710504	562 2M681__1710504	OVERHEAD	2M681	10	654	658 -
564 73C83__1761976	564 73C83__1761976	OVERHEAD	73C83	10	678	681 -
565 2M667__1782271	565 2M667__1782271	OVERHEAD	2M667	10	711	715 -
566 2M665__1710481	566 2M665__1710481	OVERHEAD	2M665	10	716	720 -
567 2M662__1710480	567 2M662__1710480	OVERHEAD	2M662	10	724	728 -
568 2M639__1710363	568 2M639__1710363	OVERHEAD	2M639	10	830	835 -
573 2M638__1710362	573 2M638__1710362	OVERHEAD	2M638	10	819	824 -
574 2M637__1777466	574 2M637__1777466	OVERHEAD	2M637	10	827	832 -
575 2M632__1710353	575 2M632__1710353	OVERHEAD	2M632	10	840	845 -
582 2M630__1710361	582 2M630__1710361	OVERHEAD	2M630	10	828	834 -
583 2M627__1710360	583 2M627__1710360	OVERHEAD	2M627	10	833	839 -
584 2M626__1773219	584 2M626__1773219	OVERHEAD	2M626	10	836	842 -
585 2M624__1710352	585 2M624__1710352	OVERHEAD	2M624	10	841	847 -
586 2M621__1780489	586 2M621__1780489	OVERHEAD	2M621	10	852	858 -
591 2M620__1766450	591 2M620__1766450	OVERHEAD	2M620	10	850	856 -
592 2M615__1710351	592 2M615__1710351	OVERHEAD	2M615	10	853	859 -
593 2M613__1710350	593 2M613__1710350	OVERHEAD	2M613	10	857	863 -
596 2M610__1710349	596 2M610__1710349	OVERHEAD	2M610	10	856	862 -
597 2M609__1778677	597 2M609__1778677	OVERHEAD	2M609	10	863	869 -
598 2M608__1710348	598 2M608__1710348	OVERHEAD	2M608	10	867	873 -
599 2M607__1710358	599 2M607__1710358	OVERHEAD	2M607	10	873	879 -
606 TLD63__1710357	606 TLD63__1710357	OVERHEAD	TLD63	10	853	859 -
607 TLD62__1710359	607 TLD62__1710359	OVERHEAD	TLD62	10	859	864 -
608 TLD61__1710356	608 TLD61__1710356	OVERHEAD	TLD61	10	864	870 -
609 TLD60__1710354	609 TLD60__1710354	OVERHEAD	TLD60	10	869	875 -
610 TLD59__1710355	610 TLD59__1710355	OVERHEAD	TLD59	10	874	880 -
613 2M603__1710245	613 2M603__1710245	OVERHEAD	2M603	10	0	0 -
634 54J48__1710341	634 54J48__1710341	OVERHEAD	54J48	10	0	0 -
638 56W20__1760537	638 56W20__1760537	OVERHEAD	56W20	10	0	0 -
639 2M600__1710345	639 2M600__1710345	OVERHEAD	2M600	10	0	0 -
645 102254__1770703	645 102254__1770703	OVERHEAD	102254	10	0	0 -
646 102253__1780361	646 102253__1780361	OVERHEAD	102253	10	0	0 -
647 93X95__1773042	647 93X95__1773042	OVERHEAD	93X95	10	0	0 -
648 93X94__1775093	648 93X94__1775093	OVERHEAD	93X94	10	0	0 -
649 93X93__1767966	649 93X93__1767966	OVERHEAD	93X93	10	0	0 -
650 2M598__1710344	650 2M598__1710344	OVERHEAD	2M598	10	0	0 -
651 2M597__1710343	651 2M597__1710343	OVERHEAD	2M597	10	0	0 -
655 58K98__1710347	655 58K98__1710347	OVERHEAD	58K98	10	0	0 -
656 58K97__1761561	656 58K97__1761561	OVERHEAD	58K97	10	0	0 -
657 2M595__1710346	657 2M595__1710346	OVERHEAD	2M595	10	0	0 -
658 2N232__1774970	658 2N232__1774970	OVERHEAD	2N232	10	0	0 -
659 2M594__1710342	659 2M594__1710342	OVERHEAD	2M594	10	0	0 -
662 2M589__1710232	662 2M589__1710232	OVERHEAD	2M589	10	0	0 -
663 2M587__1710244	663 2M587__1710244	OVERHEAD	2M587	10	918	925 -
664 2M579__1710242	664 2M579__1710242	OVERHEAD	2M579	10	945	952 -
665 2M576__1710241	665 2M576__1710241	OVERHEAD	2M576	10	959	966 -

666 2M575__1710240	666 2M575__1710240	OVERHEAD	2M575	10	968	975 -
667 2M574__1710239	667 2M574__1710239	OVERHEAD	2M574	10	975	982 -
668 2M572__1710238	668 2M572__1710238	OVERHEAD	2M572	10	980	987 -
676 TLD93__1710112	676 TLD93__1710112	OVERHEAD	TLD93	10	949	956 -
677 TLD72__1710246	677 TLD72__1710246	OVERHEAD	TLD72	10	966	973 -
680 151940__103108636	680 151940__103108636	OVERHEAD	151940	10	972	980 -
684 2M570__1710237	684 2M570__1710237	OVERHEAD	2M570	10	983	990 -
689 2NWX67__1761776	689 2NWX67__1761776	OVERHEAD	2NWX67	10	979	986 -
697 2M562__109512409	697 2M562__109512409	OVERHEAD	2M562	10	926	933 -
700 87X21__1766018	700 87X21__1766018	OVERHEAD	87X21	10	931	938 -
702 8ER66__1767643	702 8ER66__1767643	OVERHEAD	8ER66	10	931	938 -
703 2M560__1764200	703 2M560__1764200	OVERHEAD	2M560	10	940	947 -
704 2M558__1760944	704 2M558__1760944	OVERHEAD	2M558	10	954	961 -
708 2M567__1775235	708 2M567__1775235	OVERHEAD	2M567	10	940	947 -
709 2M565__1710110	709 2M565__1710110	OVERHEAD	2M565	10	948	955 -
710 2M564__1710111	710 2M564__1710111	OVERHEAD	2M564	10	955	962 -
711 2M563__1710114	711 2M563__1710114	OVERHEAD	2M563	10	962	970 -
712 2NWX68__1710113	712 2NWX68__1710113	OVERHEAD	2NWX68	10	970	978 -
716 T8A15__1710247	716 T8A15__1710247	OVERHEAD	T8A15	30	984	992 -
717 2M383__1710248	717 2M383__1710248	OVERHEAD	2M383	10	1001	1009 -
718 2M381__1710236	718 2M381__1710236	OVERHEAD	2M381	10	1007	1015 -
723 2M370__1710251	723 2M370__1710251	OVERHEAD	2M370	20	1012	1021 -
728 2N823__1710258	728 2N823__1710258	OVERHEAD	2N823	20	1003	1011 -
732 9E733__1768990	732 9E733__1768990	OVERHEAD	9E733	30	1001	1009 -
733 2M374__1710256	733 2M374__1710256	OVERHEAD	2M374	10	1004	1012 -
737 15BD92__103353517	737 15BD92__103353517	OVERHEAD	15BD92	10	1004	1012 -
738 2M373__1710252	738 2M373__1710252	OVERHEAD	2M373	10	1008	1016 -
741 2M376__1710253	741 2M376__1710253	OVERHEAD	2M376	10	1005	1013 -
742 2M375__1710255	742 2M375__1710255	OVERHEAD	2M375	20	1009	1017 -
743 2M368__1710250	743 2M368__1710250	OVERHEAD	2M368	20	1015	1023 -
744 2M365__1710249	744 2M365__1710249	OVERHEAD	2M365	30	1022	1031 -
748 17RL37__104608170	748 17RL37__104608170	OVERHEAD	17RL37	30	1031	1040 -
749 2M361__1710257	749 2M361__1710257	OVERHEAD	2M361	10	1041	1050 -
753 98L88__1768366	753 98L88__1768366	OVERHEAD	98L88	30	1044	1053 -
757 17K740__104280136	757 17K740__104280136	OVERHEAD	17K740	10	1061	1070 -
768 5L108__1710260	768 5L108__1710260	OVERHEAD	5L108	10	1032	1040 -
787 17G127__104199417	787 17G127__104199417	OVERHEAD	17G127	10	947	954 -
800 2M403__1710442	800 2M403__1710442	OVERHEAD	2M403	10	862	868 -
807 2M412__1710440	807 2M412__1710440	OVERHEAD	2M412	10	822	827 -
808 2M409__1710439	808 2M409__1710439	OVERHEAD	2M409	10	845	851 -
810 2M414__104319998	810 2M414__104319998	OVERHEAD	2M414	10	858	863 -
811 2M416__1710443	811 2M416__1710443	OVERHEAD	2M416	10	899	905 -
812 2M417__1710446	812 2M417__1710446	OVERHEAD	2M417	10	903	910 -
813 2M419__1710444	813 2M419__1710444	OVERHEAD	2M419	10	908	914 -
814 2M421__1710445	814 2M421__1710445	OVERHEAD	2M421	10	912	918 -
815 5JQ29__1710447	815 5JQ29__1710447	OVERHEAD	5JQ29	10	923	930 -
816 5JQ28__1710378	816 5JQ28__1710378	OVERHEAD	5JQ28	10	932	939 -
817 14Q544__103020362	817 14Q544__103020362	OVERHEAD	14Q544	10	936	942 -
818 5JQ27__1772338	818 5JQ27__1772338	OVERHEAD	5JQ27	10	940	947 -
824 2P985__1710373	824 2P985__1710373	OVERHEAD	2P985	10	925	932 -
826 2N414__1710369	826 2N414__1710369	OVERHEAD	2N414	10	930	937 -
827 2N413__1710374	827 2N413__1710374	OVERHEAD	2N413	10	936	942 -
828 2N412__1710368	828 2N412__1710368	OVERHEAD	2N412	10	941	948 -
829 2N411__1710375	829 2N411__1710375	OVERHEAD	2N411	10	946	953 -
830 2X060__1772369	830 2X060__1772369	OVERHEAD	2X060	10	957	964 -
831 2X059__1710377	831 2X059__1710377	OVERHEAD	2X059	10	959	967 -
832 2X058__1710376	832 2X058__1710376	OVERHEAD	2X058	10	964	972 -
833 2N476__1710371	833 2N476__1710371	OVERHEAD	2N476	10	970	977 -
834 2N332__1710370	834 2N332__1710370	OVERHEAD	2N332	10	975	982 -
835 2N331__1710372	835 2N331__1710372	OVERHEAD	2N331	10	980	988 -
836 2NY93__1710366	836 2NY93__1710366	OVERHEAD	2NY93	10	987	995 -
837 2NX37__1710365	837 2NX37__1710365	OVERHEAD	2NX37	10	995	1003 -
838 1C3W95__113642617	838 1C3W95__113642617	OVERHEAD	1C3W95	10	998	1005 -
839 2NX36__103021048	839 2NX36__103021048	OVERHEAD	2NX36	10	1003	1010 -
840 2NX35__1710367	840 2NX35__1710367	OVERHEAD	2NX35	10	1010	1018 -
841 2NX34__1710259	841 2NX34__1710259	OVERHEAD	2NX34	10	1020	1029 -
842 9AP77__1768545	842 9AP77__1768545	OVERHEAD	9AP77	10	1040	1049 -
850 15W463__103955478	850 15W463__103955478	OVERHEAD	15W463	10	1019	1027 -
851 9MJ65__1772092	851 9MJ65__1772092	OVERHEAD	9MJ65	10	1025	1033 -
852 9MJ63__1769586	852 9MJ63__1769586	OVERHEAD	9MJ63	10	1032	1040 -
853 98435__1768881	853 98435__1768881	OVERHEAD	98435	10	1039	1047 -
855 98436__1768331	855 98436__1768331	OVERHEAD	98436	10	1038	1047 -
856 98434__1775936	856 98434__1775936	OVERHEAD	98434	10	1043	1051 -
857 2NX31__1765493	857 2NX31__1765493	OVERHEAD	2NX31	10	1050	1059 -

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858 2NX30_1774859	858 2NX30_1774859	OVERHEAD	2NX30	10	1060	1069 -
859 2NX29_1769033	859 2NX29_1769033	OVERHEAD	2NX29	10	1069	1078 -
860 2NX28_1768414	860 2NX28_1768414	OVERHEAD	2NX28	10	1081	1090 -
861 2M353_1771605	861 2M353_1771605	OVERHEAD	2M353	10	1096	1106 -
866 2M348_1710261	866 2M348_1710261	OVERHEAD	2M348	20	1100	1109 -
867 2M341_1710115	867 2M341_1710115	OVERHEAD	2M341	10	1153	1164 -
868 2M339_1710273	868 2M339_1710273	OVERHEAD	2M339	10	1171	1182 -
869 2M334_1710272	869 2M334_1710272	OVERHEAD	2M334	10	1189	1200 -
870 15W088_103956708	870 15W088_103956708	OVERHEAD	15W088	10	1194	1205 -
871 2M332_1710271	871 2M332_1710271	OVERHEAD	2M332	10	1199	1210 -
872 2M331_1710275	872 2M331_1710275	OVERHEAD	2M331	10	1209	1221 -
873 2M230_1710262	873 2M230_1710262	OVERHEAD	2M230	10	1224	1236 -
874 2M228_1710279	874 2M228_1710279	OVERHEAD	2M228	10	1230	1242 -
875 2M225_1710281	875 2M225_1710281	OVERHEAD	2M225	10	1238	1250 -
876 2M224_1710278	876 2M224_1710278	OVERHEAD	2M224	10	1250	1262 -
877 2M220_1710277	877 2M220_1710277	OVERHEAD	2M220	10	1264	1276 -
878 2M205_1710126	878 2M205_1710126	OVERHEAD	2M205	10	1271	1284 -
887 2Q994_1710134	887 2Q994_1710134	OVERHEAD	2Q994	10	1190	1201 -
888 2M216_1710133	888 2M216_1710133	OVERHEAD	2M216	10	1201	1213 -
889 2M215_1710132	889 2M215_1710132	OVERHEAD	2M215	10	1212	1224 -
891 2Q987_1710282	891 2Q987_1710282	OVERHEAD	2Q987	10	1201	1212 -
892 2M211_1710128	892 2M211_1710128	OVERHEAD	2M211	10	1231	1243 -
893 2M210_1710127	893 2M210_1710127	OVERHEAD	2M210	10	1247	1260 -
895 2M201_1710125	895 2M201_1710125	OVERHEAD	2M201	10	1310	1324 -
896 2M187_1710123	896 2M187_1710123	OVERHEAD	2M187	10	1320	1334 -
904 2M194_1710118	904 2M194_1710118	OVERHEAD	2M194	10	1260	1273 -
911 2M200_1710120	911 2M200_1710120	OVERHEAD	2M200	10	1223	1235 -
916 15PQ27_103889379	916 15PQ27_103889379	OVERHEAD	15PQ27	10	1251	1264 -
919 7RX87_103889372	919 7RX87_103889372	OVERHEAD	7RX87	10	1258	1270 -
920 2M192_1710117	920 2M192_1710117	OVERHEAD	2M192	10	1274	1287 -
925 7Q229_1764635	925 7Q229_1764635	OVERHEAD	7Q229	10	1252	1264 -
926 7AB54_1763056	926 7AB54_1763056	OVERHEAD	7AB54	10	1262	1275 -
927 7AB51_1764903	927 7AB51_1764903	OVERHEAD	7AB51	10	1274	1287 -
928 2M190_1710116	928 2M190_1710116	OVERHEAD	2M190	10	1286	1299 -
929 2M188_1710124	929 2M188_1710124	OVERHEAD	2M188	10	1314	1328 -
930 2M181_1710122	930 2M181_1710122	OVERHEAD	2M181	10	1349	1363 -
933 2M178_1710121	933 2M178_1710121	OVERHEAD	2M178	10	1368	1383 -
937 2NZ33_1710135	937 2NZ33_1710135	OVERHEAD	2NZ33	10	1367	1382 -
938 2M174_1710136	938 2M174_1710136	OVERHEAD	2M174	10	1388	1404 -
941 2M168_1710130	941 2M168_1710130	OVERHEAD	2M168	10	1417	1433 -
942 2M143_1710129	942 2M143_1710129	OVERHEAD	2M143	10	1477	1495 -
952 2M162_1710026	952 2M162_1710026	OVERHEAD	2M162	10	1339	1353 -
961 70C55_1764543	961 70C55_1764543	OVERHEAD	70C55	10	1270	1283 -
962 2M159_1710035	962 2M159_1710035	OVERHEAD	2M159	10	1282	1295 -
963 2M137_1710034	963 2M137_1710034	OVERHEAD	2M137	10	1525	1544 -
964 2M133_1710033	964 2M133_1710033	OVERHEAD	2M133	10	1547	1566 -
968 2M135_1710036	968 2M135_1710036	OVERHEAD	2M135	10	1532	1551 -
969 2M119_1710028	969 2M119_1710028	OVERHEAD	2M119	10	1570	1590 -
975 2M131_1710032	975 2M131_1710032	OVERHEAD	2M131	10	1502	1521 -
976 2M129_1710031	976 2M129_1710031	OVERHEAD	2M129	10	1536	1556 -
977 2M115_1710027	977 2M115_1710027	OVERHEAD	2M115	10	1592	1613 -
983 2M126_1710030	983 2M126_1710030	OVERHEAD	2M126	10	1496	1514 -
984 2M123_1710029	984 2M123_1710029	OVERHEAD	2M123	10	1529	1549 -
985 2M122_1765045	985 2M122_1765045	OVERHEAD	2M122	10	1558	1578 -
989 2M112_1710038	989 2M112_1710038	OVERHEAD	2M112	10	1555	1574 -
990 2M106_1779716	990 2M106_1779716	OVERHEAD	2M106	20	1661	1684 -
994 2KJ91_1710039	994 2KJ91_1710039	OVERHEAD	2KJ91	10	1654	1676 -
998 2KJ99_1710040	998 2KJ99_1710040	OVERHEAD	2KJ99	10	1640	1662 -
1000 2KJ87_1710037	1000 2KJ87_1710037	OVERHEAD	2KJ87	10	1702	1726 -
1001 2KJ85_1710046	1001 2KJ85_1710046	OVERHEAD	2KJ85	10	1739	1764 -
1002 2KJ76_1710045	1002 2KJ76_1710045	OVERHEAD	2KJ76	20	1816	1843 -
1011 2KJ70_1710044	1011 2KJ70_1710044	OVERHEAD	2KJ70	10	1739	1764 -
1012 2KJ64_1710043	1012 2KJ64_1710043	OVERHEAD	2KJ64	10	1790	1816 -
1013 2KJ63_1710048	1013 2KJ63_1710048	OVERHEAD	2KJ63	10	1833	1861 -
1014 2KJ61_1710042	1014 2KJ61_1710042	OVERHEAD	2KJ61	10	1855	1884 -
1015 2KJ58_1710041	1015 2KJ58_1710041	OVERHEAD	2KJ58	10	1875	1904 New
1023 101974_1770625	1023 101974_1770625	OVERHEAD	101974	10	1798	1825 -
1025 2KJ54_1710054	1025 2KJ54_1710054	OVERHEAD	2KJ54	10	1919	1949 New
1026 2KJ50_106750065	1026 2KJ50_106750065	OVERHEAD	2KJ50	10	2001	2034 -
1027 2KJ49_1710053	1027 2KJ49_1710053	OVERHEAD	2KJ49	10	2011	2045 -
1033 2KJ43_1709884	1033 2KJ43_1709884	OVERHEAD	2KJ43	10	1996	2029 New
1037 2KJ47_1709885	1037 2KJ47_1709885	OVERHEAD	2KJ47	10	1939	1970 New
1038 2KJ42_1709883	1038 2KJ42_1709883	OVERHEAD	2KJ42	10	2019	2053 -
1039 2KJ41_1709882	1039 2KJ41_1709882	OVERHEAD	2KJ41	10	2040	2075 -

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1040 2KJ36_1709881	1040 2KJ36_1709881	OVERHEAD	2KJ36	10	2128	2166 -
1041 2KJ30_1709893	1041 2KJ30_1709893	OVERHEAD	2KJ30	10	2174	2214 -
1045 2KJ33_1709894	1045 2KJ33_1709894	OVERHEAD	2KJ33	10	2140	2178 -
1050 2KJ29_1709892	1050 2KJ29_1709892	OVERHEAD	2KJ29	10	2154	2193 -
1051 2KJ27_1709891	1051 2KJ27_1709891	OVERHEAD	2KJ27	10	2215	2256 -
1052 2KJ25_1709890	1052 2KJ25_1709890	OVERHEAD	2KJ25	10	2273	2317 -
1053 2KJ23_1709889	1053 2KJ23_1709889	OVERHEAD	2KJ23	10	2313	2358 -
1056 2KJ21_1709888	1056 2KJ21_1709888	OVERHEAD	2KJ21	10	2358	2404 -
1057 2KJ17_1709903	1057 2KJ17_1709903	OVERHEAD	2KJ17	10	2512	2564 -
1063 54T77_1709916	1063 54T77_1709916	OVERHEAD	54T77	10	2504	2557 -
1064 2KJ09_1709914	1064 2KJ09_1709914	OVERHEAD	2KJ09	30	2558	2612 -
1070 2KJ02_1709902	1070 2KJ02_1709902	OVERHEAD	2KJ02	30	2561	2616 -
1074 112829_1773961	1074 112829_1773961	OVERHEAD	112829	30	2569	2625 -
1075 12L580_109775937	1075 12L580_109775937	OVERHEAD	12L580	10	2594	2650 -
1082 2KH88_1709899	1082 2KH88_1709899	OVERHEAD	2KH88	10	2468	2519 -
1086 2KH93_1709917	1086 2KH93_1709917	OVERHEAD	2KH93	10	2416	2464 -
1087 2KH92_103970766	1087 2KH92_103970766	OVERHEAD	2KH92	10	2443	2493 -
1088 2KH90_1709900	1088 2KH90_1709900	OVERHEAD	2KH90	10	2477	2529 -
1089 2KH86_1709913	1089 2KH86_1709913	OVERHEAD	2KH86	10	2521	2574 -
1090 2KH84_1709898	1090 2KH84_1709898	OVERHEAD	2KH84	10	2578	2633 -
1096 17R607_104680921	1096 17R607_104680921	OVERHEAD	17R607	30	2623	2680 -
1102 18HJ61_106172167	1102 18HJ61_106172167	OVERHEAD	18HJ61	30	2636	2694 -
1103 2KH72_1709897	1103 2KH72_1709897	OVERHEAD	2KH72	10	2680	2740 -
1106 2KH71_1709896	1106 2KH71_1709896	OVERHEAD	2KH71	10	2646	2705 -
1107 2KH68_1709920	1107 2KH68_1709920	OVERHEAD	2KH68	10	2698	2759 -
1108 2KH67_108789002	1108 2KH67_108789002	OVERHEAD	2KH67	10	2721	2783 -
1109 2KH63_1709919	1109 2KH63_1709919	OVERHEAD	2KH63	10	2735	2798 -
1137 2KG19_1710149	1137 2KG19_1710149	OVERHEAD	2KG19	10	1934	1965 New
1176 2KH24_1710466	1176 2KH24_1710466	OVERHEAD	2KH24	10	1240	1252 -
1180 128R12_1777404	1180 128R12_1777404	OVERHEAD	128R12	10	1214	1226 -
1187 2KH39_1710494	1187 2KH39_1710494	OVERHEAD	2KH39	10	1144	1155 -
1188 2KH35_1710493	1188 2KH35_1710493	OVERHEAD	2KH35	10	1172	1182 -
1198 2KH60_1710492	1198 2KH60_1710492	OVERHEAD	2KH60	10	1055	1064 -
1205 2KH58_1710509	1205 2KH58_1710509	OVERHEAD	2KH58	10	1045	1054 -
1206 2KH55_1710510	1206 2KH55_1710510	OVERHEAD	2KH55	10	1068	1077 -
1207 2KH47_1710495	1207 2KH47_1710495	OVERHEAD	2KH47	10	1125	1135 -
1208 2KH45_1780119	1208 2KH45_1780119	OVERHEAD	2KH45	10	1134	1144 -
1209 2KH26_1710467	1209 2KH26_1710467	OVERHEAD	2KH26	10	1241	1253 -
1210 2KH20_1710465	1210 2KH20_1710465	OVERHEAD	2KH20	10	1266	1279 -
1215 2KH19_1710464	1215 2KH19_1710464	OVERHEAD	2KH19	10	1245	1257 -
1216 2KH16_1710463	1216 2KH16_1710463	OVERHEAD	2KH16	10	1282	1295 -
1217 2KH13_1710462	1217 2KH13_1710462	OVERHEAD	2KH13	10	1309	1323 -
1230 2KH00_1710455	1230 2KH00_1710455	OVERHEAD	2KH00	10	1144	1154 -
1231 2KG96_1710458	1231 2KG96_1710458	OVERHEAD	2KG96	10	1191	1202 -
1232 2KG94_1710457	1232 2KG94_1710457	OVERHEAD	2KG94	10	1214	1226 -
1233 2KG92_1710456	1233 2KG92_1710456	OVERHEAD	2KG92	10	1236	1249 -
1241 2KH08_1710461	1241 2KH08_1710461	OVERHEAD	2KH08	10	1190	1201 -
1242 2KH07_1783055	1242 2KH07_1783055	OVERHEAD	2KH07	10	1195	1207 -
1246 2KH12_1710491	1246 2KH12_1710491	OVERHEAD	2KH12	10	1104	1114 -
1247 2KH04_1710460	1247 2KH04_1710460	OVERHEAD	2KH04	10	1221	1233 -
1248 2KH03_1772493	1248 2KH03_1772493	OVERHEAD	2KH03	10	1249	1262 -
1249 2KG85_1710459	1249 2KG85_1710459	OVERHEAD	2KG85	10	1306	1320 -
1250 2KG77_1710395	1250 2KG77_1710395	OVERHEAD	2KG77	10	1384	1399 -
1251 2KG73_1710394	1251 2KG73_1710394	OVERHEAD	2KG73	10	1433	1450 -
1252 2KG70_1710393	1252 2KG70_1710393	OVERHEAD	2KG70	10	1462	1479 -
1253 2KG68_1710392	1253 2KG68_1710392	OVERHEAD	2KG68	10	1518	1536 -
1254 2KG66_1710391	1254 2KG66_1710391	OVERHEAD	2KG66	10	1525	1544 -
1263 2KG64_1779562	1263 2KG64_1779562	OVERHEAD	2KG64	10	1392	1408 -
1264 2KG59_1765383	1264 2KG59_1765383	OVERHEAD	2KG59	10	1495	1514 -
1265 2KG58_1710390	1265 2KG58_1710390	OVERHEAD	2KG58	10	1521	1539 -
1266 2KG57_1710389	1266 2KG57_1710389	OVERHEAD	2KG57	10	1542	1561 -
1267 2KG55_1710291	1267 2KG55_1710291	OVERHEAD	2KG55	10	1561	1581 -
1268 2KG51_1710290	1268 2KG51_1710290	OVERHEAD	2KG51	10	1577	1597 -
1269 2KG47_1710289	1269 2KG47_1710289	OVERHEAD	2KG47	10	1661	1684 -
1270 2KG36_1710288	1270 2KG36_1710288	OVERHEAD	2KG36	10	1682	1705 -
1271 2KG35_1710287	1271 2KG35_1710287	OVERHEAD	2KG35	10	1699	1723 -
1272 2X139_1710286	1272 2X139_1710286	OVERHEAD	2X139	10	1772	1798 -
1273 2KG30_1710147	1273 2KG30_1710147	OVERHEAD	2KG30	10	1791	1817 -
1274 2KG29_1710146	1274 2KG29_1710146	OVERHEAD	2KG29	10	1833	1861 -
1275 2KG28_1710148	1275 2KG28_1710148	OVERHEAD	2KG28	10	1872	1901 New
1276 2KG24_1710145	1276 2KG24_1710145	OVERHEAD	2KG24	10	1961	1993 New
1277 2KG15_1710144	1277 2KG15_1710144	OVERHEAD	2KG15	10	2037	2072 -
1289 13QA57_1781399	1289 13QA57_1781399	OVERHEAD	13QA57	10	1786	1812 -
1290 2L975_104386300	1290 2L975_104386300	OVERHEAD	2L975	10	1797	1824 -

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1296 2KG04_104383485	1296 2KG04_104383485	OVERHEAD	2KG04	10	1677	1700 -
1302 2KG11_1710052	1302 2KG11_1710052	OVERHEAD	2KG11	10	1622	1644 -
1303 185L78_104751350	1303 185L78_104751350	OVERHEAD	185L78	10	1654	1676 -
1304 2KG06_1710050	1304 2KG06_1710050	OVERHEAD	2KG06	10	1679	1702 -
1305 2KG02_1710049	1305 2KG02_1710049	OVERHEAD	2KG02	10	1700	1724 -
1306 1CDQ96_114161940	1306 1CDQ96_114161940	OVERHEAD	1CDQ96	10	1757	1782 -
1307 2L997_1710060	1307 2L997_1710060	OVERHEAD	2L997	10	1775	1801 -
1319 2L993_1710139	1319 2L993_1710139	OVERHEAD	2L993	10	1554	1573 -
1322 2L996_1710140	1322 2L996_1710140	OVERHEAD	2L996	10	1544	1563 -
1323 2L986_1710138	1323 2L986_1710138	OVERHEAD	2L986	10	1641	1663 -
1324 2L984_1710137	1324 2L984_1710137	OVERHEAD	2L984	10	1666	1689 -
1329 2L982_1710143	1329 2L982_1710143	OVERHEAD	2L982	10	1644	1666 -
1331 2L981_1710142	1331 2L981_1710142	OVERHEAD	2L981	10	1663	1686 -
1332 2L980_1710141	1332 2L980_1710141	OVERHEAD	2L980	10	1684	1707 -
1333 2L978_1710059	1333 2L978_1710059	OVERHEAD	2L978	10	1706	1730 -
1334 2L974_1710058	1334 2L974_1710058	OVERHEAD	2L974	10	1812	1839 -
1335 2L972_1710057	1335 2L972_1710057	OVERHEAD	2L972	10	1878	1907 New
1336 2L971_1710056	1336 2L971_1710056	OVERHEAD	2L971	10	1899	1929 New
1337 2L968_1710067	1337 2L968_1710067	OVERHEAD	2L968	10	1900	1971 New
1338 2L964_1710066	1338 2L964_1710066	OVERHEAD	2L964	10	2039	2074 -
1339 2L962_1710065	1339 2L962_1710065	OVERHEAD	2L962	10	2070	2106 -
1340 2L958_1710068	1340 2L958_1710068	OVERHEAD	2L958	20	2155	2194 -
1350 1B2D80_110598742	1350 1B2D80_110598742	OVERHEAD	1B2D80	10	2266	2309 -
1354 1B2D83_110598735	1354 1B2D83_110598735	OVERHEAD	1B2D83	10	2252	2295 -
1361 7G925_1765709	1361 7G925_1765709	OVERHEAD	7G925	10	2183	2223 -
1367 2L943_1710062	1367 2L943_1710062	OVERHEAD	2L943	10	2285	2329 -
1368 2L933_1710061	1368 2L933_1710061	OVERHEAD	2L933	10	2313	2358 -
1373 2L950_1710063	1373 2L950_1710063	OVERHEAD	2L950	10	2266	2309 -
1374 2L951_1710064	1374 2L951_1710064	OVERHEAD	2L951	10	2288	2331 -
1376 2NY27_1710069	1376 2NY27_1710069	OVERHEAD	2NY27	20	2298	2343 -
1377 2L930_1710076	1377 2L930_1710076	OVERHEAD	2L930	10	2362	2408 -
1378 2L926_1710075	1378 2L926_1710075	OVERHEAD	2L926	10	2441	2491 -
1379 2L922_1710074	1379 2L922_1710074	OVERHEAD	2L922	10	2493	2546 -
1381 2L921_1709953	1381 2L921_1709953	OVERHEAD	2L921	10	2555	2609 -
1385 2L920_1709952	1385 2L920_1709952	OVERHEAD	2L920	20	2543	2597 -
1389 7HW05_109775910	1389 7HW05_109775910	OVERHEAD	7HW05	10	2474	2525 -
1392 7HW06_1764288	1392 7HW06_1764288	OVERHEAD	7HW06	30	2462	2513 -
1393 2L916_1709951	1393 2L916_1709951	OVERHEAD	2L916	10	2650	2709 -
1394 2L913_1709950	1394 2L913_1709950	OVERHEAD	2L913	20	2684	2744 -
1397 2L908_1709949	1397 2L908_1709949	OVERHEAD	2L908	10	2693	2754 -
1398 2L902_1709948	1398 2L902_1709948	OVERHEAD	2L902	20	2743	2806 -
1399 2L893_1709947	1399 2L893_1709947	OVERHEAD	2L893	20	2787	2852 -
1405 2L877_1709945	1405 2L877_1709945	OVERHEAD	2L877	10	2657	2716 -
1413 2L891_1709790	1413 2L891_1709790	OVERHEAD	2L891	10	2480	2531 -
1414 2L889_1709789	1414 2L889_1709789	OVERHEAD	2L889	10	2501	2553 -
1415 2L884_1709911	1415 2L884_1709911	OVERHEAD	2L884	10	2542	2597 -
1416 2L882_1709912	1416 2L882_1709912	OVERHEAD	2L882	10	2571	2627 -
1417 2L878_1709946	1417 2L878_1709946	OVERHEAD	2L878	20	2649	2708 -
1418 2L876_1778704	1418 2L876_1778704	OVERHEAD	2L876	10	2685	2745 -
1419 2L872_1709944	1419 2L872_1709944	OVERHEAD	2L872	10	2731	2794 -
1420 2L871_1709943	1420 2L871_1709943	OVERHEAD	2L871	10	2770	2834 -
1421 2L869_1709942	1421 2L869_1709942	OVERHEAD	2L869	20	2828	2895 -
1432 2KW40_1709927	1432 2KW40_1709927	OVERHEAD	2KW40	10	2649	2708 -
1436 2KW48_1709928	1436 2KW48_1709928	OVERHEAD	2KW48	30	2622	2680 -
1444 2KW70_1709961	1444 2KW70_1709961	OVERHEAD	2KW70	10	2311	2356 -
1447 2KW75_1767273	1447 2KW75_1767273	OVERHEAD	2KW75	10	2276	2319 -
1448 2KW69_1709960	1448 2KW69_1709960	OVERHEAD	2KW69	10	2346	2392 -
1449 2KW66_1709972	1449 2KW66_1709972	OVERHEAD	2KW66	10	2382	2429 -
1450 2KW65_1709971	1450 2KW65_1709971	OVERHEAD	2KW65	10	2426	2475 -
1454 8NN88_1766922	1454 8NN88_1766922	OVERHEAD	8NN88	10	2395	2443 -
1459 8NP06_106288528	1459 8NP06_106288528	OVERHEAD	8NP06	10	2413	2462 -
1463 8NN89_1766921	1463 8NN89_1766921	OVERHEAD	8NN89	10	2389	2437 -
1464 2KW80_1710078	1464 2KW80_1710078	OVERHEAD	2KW80	20	2431	2481 -
1480 2KW94_1710163	1480 2KW94_1710163	OVERHEAD	2KW94	10	1990	2023 New
1481 2KW93_1710162	1481 2KW93_1710162	OVERHEAD	2KW93	10	2016	2050 -
1489 2NA09_1710158	1489 2NA09_1710158	OVERHEAD	2NA09	10	1849	1877 -
1490 2NA08_1710168	1490 2NA08_1710168	OVERHEAD	2NA08	10	1886	1915 New
1491 2NA05_1710167	1491 2NA05_1710167	OVERHEAD	2NA05	10	1919	1949 New
1492 2NA02_1710166	1492 2NA02_1710166	OVERHEAD	2NA02	10	1946	1977 New
1493 2KW98_1710165	1493 2KW98_1710165	OVERHEAD	2KW98	10	1983	2016 New
1494 2KW96_1710164	1494 2KW96_1710164	OVERHEAD	2KW96	10	2011	2045 -
1500 2NA16_1710170	1500 2NA16_1710170	OVERHEAD	2NA16	10	1954	1986 New
1502 2NA13_1710169	1502 2NA13_1710169	OVERHEAD	2NA13	10	1975	2007 New
1503 2KW79_1710077	1503 2KW79_1710077	OVERHEAD	2KW79	10	2463	2514 -

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1512 2KW63_1710073	1512 2KW63_1710073	OVERHEAD	2KW63	10	2225	2266 -
1515 13XK01_1781836	1515 13XK01_1781836	OVERHEAD	13XK01	10	2208	2249 -
1516 79A29_1763063	1516 79A29_1763063	OVERHEAD	79A29	10	2235	2276 -
1517 2KW61_1710072	1517 2KW61_1710072	OVERHEAD	2KW61	10	2299	2343 -
1518 12DG65_1777786	1518 12DG65_1777786	OVERHEAD	12DG65	10	2324	2369 -
1519 2KW60_1710071	1519 2KW60_1710071	OVERHEAD	2KW60	10	2357	2404 -
1520 2KW59_1710070	1520 2KW59_1710070	OVERHEAD	2KW59	10	2415	2464 -
1521 2KW58_1710079	1521 2KW58_1710079	OVERHEAD	2KW58	10	2460	2510 -
1522 2KW54_1709930	1522 2KW54_1709930	OVERHEAD	2KW54	10	2550	2604 -
1523 2KW49_1709929	1523 2KW49_1709929	OVERHEAD	2KW49	10	2612	2670 -
1524 2KW38_1709926	1524 2KW38_1709926	OVERHEAD	2KW38	10	2681	2742 -
1525 2KW33_1709925	1525 2KW33_1709925	OVERHEAD	2KW33	10	2781	2846 -
1526 2KW18_112104634	1526 2KW18_112104634	OVERHEAD	2KW18	10	2814	2880 -
1530 2KW21_1709922	1530 2KW21_1709922	OVERHEAD	2KW21	30	2783	2848 -
1542 2M732_1709968	1542 2M732_1709968	OVERHEAD	2M732	10	2567	2622 -
1550 7WL35_1764697	1550 7WL35_1764697	OVERHEAD	7WL35	10	2440	2490 -
1551 2M737_1709969	1551 2M737_1709969	OVERHEAD	2M737	10	2550	2604 -
1552 76693_1709973	1552 76693_1709973	OVERHEAD	76693	20	2629	2687 -
1553 58830_1709924	1553 58830_1709924	OVERHEAD	58830	10	2687	2747 -
1557 2KW29_1709918	1557 2KW29_1709918	OVERHEAD	2KW29	30	2691	2752 -
1561 124P66_1777070	1561 124P66_1777070	OVERHEAD	124P66	30	2673	2733 -
1565 88F00_1766081	1565 88F00_1766081	OVERHEAD	88F00	30	2646	2705 -
1566 2KW23_1709923	1566 2KW23_1709923	OVERHEAD	2KW23	20	2731	2794 -
1567 2KW19_1709921	1567 2KW19_1709921	OVERHEAD	2KW19	10	2795	2860 -
1568 2L866_1709941	1568 2L866_1709941	OVERHEAD	2L866	20	2856	2924 -
1571 2L864_1709940	1571 2L864_1709940	OVERHEAD	2L864	20	2833	2901 -
1572 2L862_1709939	1572 2L862_1709939	OVERHEAD	2L862	20	2877	2946 -
1575 2L859_1709938	1575 2L859_1709938	OVERHEAD	2L859	10	2862	2930 -
1576 2L854_1709937	1576 2L854_1709937	OVERHEAD	2L854	10	2929	3001 -
1582 2L851_1709936	1582 2L851_1709936	OVERHEAD	2L851	10	2839	2907 -
1583 14TE49_103045804	1583 14TE49_103045804	OVERHEAD	14TE49	10	2866	2934 -
1584 2L849_1709935	1584 2L849_1709935	OVERHEAD	2L849	20	2892	2962 -
1585 2L844_1709934	1585 2L844_1709934	OVERHEAD	2L844	10	2977	3051 -
1601 2KU56_1709959	1601 2KU56_1709959	OVERHEAD	2KU56	10	2425	2590 -
1719 2ND49_1710496	1719 2ND49_1710496	OVERHEAD	2ND49	10	767	788 -
1754 111228_1773694	1754 111228_1773694	OVERHEAD	111228	10	626	641 -
1784 58C10_1710648	1784 58C10_1710648	OVERHEAD	58C10	10	535	546 -
1785 58C09_115175733	1785 58C09_115175733	OVERHEAD	58C09	10	537	548 -
1786 2NF53_1710647	1786 2NF53_1710647	OVERHEAD	2NF53	10	540	551 -
1787 2NF50_1710646	1787 2NF50_1710646	OVERHEAD	2NF50	10	544	555 -
1788 2NF47_1710645	1788 2NF47_1710645	OVERHEAD	2NF47	10	545	556 -
1789 2NF43_1710704	1789 2NF43_1710704	OVERHEAD	2NF43	10	548	559 -
1798 2NF60_1710710	1798 2NF60_1710710	OVERHEAD	2NF60	10	537	548 -
1801 2NF62_1710716	1801 2NF62_1710716	OVERHEAD	2NF62	10	532	543 -
1811 2N815_1710764	1811 2N815_1710764	OVERHEAD	2N815	10	510	520 -
1812 2N813_1710720	1812 2N813_1710720	OVERHEAD	2N813	10	514	524 -
1816 7A612_1763109	1816 7A612_1763109	OVERHEAD	7A612	10	515	525 -
1817 2NF81_1710715	1817 2NF81_1710715	OVERHEAD	2NF81	10	526	536 -
1833 2NG99_1879917	1833 2NG99_1879917	OVERHEAD	2NG99	10	484	493 -
1837 2NH02_1811846	1837 2NH02_1811846	OVERHEAD	2NH02	10	483	492 -
1842 2NH07_103705286	1842 2NH07_103705286	OVERHEAD	2NH07	10	476	484 -
1843 2NH04_1880836	1843 2NH04_1880836	OVERHEAD	2NH04	10	482	490 -
1844 2NG91_1710763	1844 2NG91_1710763	OVERHEAD	2NG91	10	507	516 -
1845 2NG88_1710762	1845 2NG88_1710762	OVERHEAD	2NG88	10	510	520 -
1846 2NG86_1781491	1846 2NG86_1781491	OVERHEAD	2NG86	10	517	527 -
1847 18LX79_106171490	1847 18LX79_106171490	OVERHEAD	18LX79	10	522	533 -
1848 2NG82_1710761	1848 2NG82_1710761	OVERHEAD	2NG82	10	524	534 -
1849 2NF64_1710712	1849 2NF64_1710712	OVERHEAD	2NF64	10	531	542 -
1860 2NF79_1710719	1860 2NF79_1710719	OVERHEAD	2NF79	10	508	517 -
1861 2NF74_1710718	1861 2NF74_1710718	OVERHEAD	2NF74	10	515	525 -
1862 2NF71_1710714	1862 2NF71_1710714	OVERHEAD	2NF71	10	523	534 -
1863 2NF68_1710713	1863 2NF68_1710713	OVERHEAD	2NF68	10	527	537 -
1864 2NF61_1710711	1864 2NF61_1710711	OVERHEAD	2NF61	10	535	546 -
1871 2NF90_1710706	1871 2NF90_1710706	OVERHEAD	2NF90	10	530	541 -
1874 2NF93_1710708	1874 2NF93_1710708	OVERHEAD	2NF93	10	528	539 -
1877 2NF92_1710707	1877 2NF92_1710707	OVERHEAD	2NF92	10	528	538 -
1878 2NF85_1710705	1878 2NF85_1710705	OVERHEAD	2NF85	10	544	555 -
1879 2NF54_1710709	1879 2NF54_1710709	OVERHEAD	2NF54	10	550	561 -
1880 2NF39_1710653	1880 2NF39_1710653	OVERHEAD	2NF39	10	556	568 -
1881 2NF14_1710651	1881 2NF14_1710651	OVERHEAD	2NF14	10	570	582 -
1904 2X184_1710616	1904 2X184_1710616	OVERHEAD	2X184	10	518	528 -
1905 2X179_1710660	1905 2X179_1710660	OVERHEAD	2X179	10	527	538 -
1906 2NF29_1710659	1906 2NF29_1710659	OVERHEAD	2NF29	10	538	549 -
1907 2NF24_1710657	1907 2NF24_1710657	OVERHEAD	2NF24	10	552	563 -

1908 2NF21_1710656	1908 2NF21_1710656	OVERHEAD	2NF21	10	558	569 -
1914 10Y783_1775529	1914 10Y783_1775529	OVERHEAD	10Y783	10	551	562 -
1916 13PH77_1781369	1916 13PH77_1781369	OVERHEAD	13PH77	10	552	564 -
1917 10Y784_1773621	1917 10Y784_1773621	OVERHEAD	10Y784	10	554	565 -
1918 2NF32_1710717	1918 2NF32_1710717	OVERHEAD	2NF32	10	556	567 -
1919 2NF31_1710658	1919 2NF31_1710658	OVERHEAD	2NF31	10	557	569 -
1920 2NF18_1710652	1920 2NF18_1710652	OVERHEAD	2NF18	10	564	576 -
1921 2NF10_1710650	1921 2NF10_1710650	OVERHEAD	2NF10	10	579	591 -
1942 17EY96_104154816	1942 17EY96_104154816	OVERHEAD	17EY96	10	535	546 -
1944 2NE91_1710549	1944 2NE91_1710549	OVERHEAD	2NE91	10	534	544 -
1945 2NE90_1780753	1945 2NE90_1780753	OVERHEAD	2NE90	10	537	548 -
1946 2NE87_1710610	1946 2NE87_1710610	OVERHEAD	2NE87	10	538	549 -
1948 2NE93_1710611	1948 2NE93_1710611	OVERHEAD	2NE93	10	540	551 -
1957 2NF03_1710550	1957 2NF03_1710550	OVERHEAD	2NF03	10	521	531 -
1961 2NF06_1710603	1961 2NF06_1710603	OVERHEAD	2NF06	10	529	540 -
1964 2NF08_1710604	1964 2NF08_1710604	OVERHEAD	2NF08	10	526	536 -
1968 2Q986_1710605	1968 2Q986_1710605	OVERHEAD	2Q986	10	527	537 -
1969 2P911_1710612	1969 2P911_1710612	OVERHEAD	2P911	10	538	549 -
1970 2NE84_1710609	1970 2NE84_1710609	OVERHEAD	2NE84	10	548	560 -
1971 2NE73_1710606	1971 2NE73_1710606	OVERHEAD	2NE73	10	557	569 -
1977 2NE80_1710608	1977 2NE80_1710608	OVERHEAD	2NE80	10	549	560 -
1980 8BM50_1766388	1980 8BM50_1766388	OVERHEAD	8BM50	10	548	559 -
1981 2NE76_1710607	1981 2NE76_1710607	OVERHEAD	2NE76	10	554	566 -
1982 148F11_1782471	1982 148F11_1782471	OVERHEAD	148F11	10	555	567 -
1983 9FL05_1768857	1983 9FL05_1768857	OVERHEAD	9FL05	10	558	569 -
1989 9D285_1768654	1989 9D285_1768654	OVERHEAD	9D285	10	559	571 -
1990 9D282_1779300	1990 9D282_1779300	OVERHEAD	9D282	10	561	573 -
1991 2NE66_1710649	1991 2NE66_1710649	OVERHEAD	2NE66	10	578	591 -
1992 2N824_1710655	1992 2N824_1710655	OVERHEAD	2N824	10	581	593 -
1993 2NE62_1710613	1993 2NE62_1710613	OVERHEAD	2NE62	10	591	604 -
1994 2NE60_1710615	1994 2NE60_1710615	OVERHEAD	2NE60	10	600	613 -
1995 2NE57_1710614	1995 2NE57_1710614	OVERHEAD	2NE57	10	610	624 -
1996 110D27_1773695	1996 110D27_1773695	OVERHEAD	110D27	10	629	644 -
1997 2NE49_1710559	1997 2NE49_1710559	OVERHEAD	2NE49	10	634	649 -
1998 2NE48_1710560	1998 2NE48_1710560	OVERHEAD	2NE48	10	641	656 -
2014 2NG12_1710564	2014 2NG12_1710564	OVERHEAD	2NG12	10	603	616 -
2017 2NG14_1710565	2017 2NG14_1710565	OVERHEAD	2NG14	10	597	610 -
2019 2NG15_1710566	2019 2NG15_1710566	OVERHEAD	2NG15	10	597	611 -
2022 8QC74_1767116	2022 8QC74_1767116	OVERHEAD	8QC74	10	594	608 -
2023 2NG06_104019453	2023 2NG06_104019453	OVERHEAD	2NG06	10	615	629 -
2024 2NG03_1710562	2024 2NG03_1710562	OVERHEAD	2NG03	10	623	637 -
2027 15D749_103407729	2027 15D749_103407729	OVERHEAD	15D749	10	624	638 -
2028 2NG02_1710561	2028 2NG02_1710561	OVERHEAD	2NG02	10	627	642 -
2048 2NG43_1710664	2048 2NG43_1710664	OVERHEAD	2NG43	10	576	589 -
2054 2NG48_1710666	2054 2NG48_1710666	OVERHEAD	2NG48	10	575	588 -
2055 2NG47_1710665	2055 2NG47_1710665	OVERHEAD	2NG47	10	578	591 -
2058 2NG50_1710667	2058 2NG50_1710667	OVERHEAD	2NG50	10	576	588 -
2066 2NG62_1710668	2066 2NG62_1710668	OVERHEAD	2NG62	10	558	569 -
2071 2NG66_1710721	2071 2NG66_1710721	OVERHEAD	2NG66	10	557	568 -
2075 2NG71_1710724	2075 2NG71_1710724	OVERHEAD	2NG71	10	554	566 -
2076 2NG70_1710723	2076 2NG70_1710723	OVERHEAD	2NG70	10	556	568 -
2080 2NG76_1710726	2080 2NG76_1710726	OVERHEAD	2NG76	10	548	560 -
2084 2NG79_1710727	2084 2NG79_1710727	OVERHEAD	2NG79	10	545	556 -
2100 2NH41_1710766	2100 2NH41_1710766	OVERHEAD	2NH41	10	505	515 -
2101 2NH40_1710765	2101 2NH40_1710765	OVERHEAD	2NH40	10	509	518 -
2102 2NH38_103127202	2102 2NH38_103127202	OVERHEAD	2NH38	10	515	525 -
2106 2NH47_1710771	2106 2NH47_1710771	OVERHEAD	2NH47	10	519	529 -
2119 2NH70_104397905	2119 2NH70_104397905	OVERHEAD	2NH70	10	489	498 -
2125 2NH76_1811924	2125 2NH76_1811924	OVERHEAD	2NH76	10	480	489 -
2149 2NJ12_1827521	2149 2NJ12_1827521	OVERHEAD	2NJ12	10	435	442 -
2156 2NJ58_1827525	2156 2NJ58_1827525	OVERHEAD	2NJ58	10	426	432 -
2175 2NJ82_1823985	2175 2NJ82_1823985	OVERHEAD	2NJ82	10	404	410 -
2185 2NJ52_1827529	2185 2NJ52_1827529	OVERHEAD	2NJ52	10	395	401 -
2186 2NJ99_1827530	2186 2NJ99_1827530	OVERHEAD	2NJ99	10	396	402 -
2196 17LA07_104356185	2196 17LA07_104356185	OVERHEAD	17LA07	10	387	393 -
2197 6M270_1865108	2197 6M270_1865108	OVERHEAD	6M270	10	391	397 -
2198 2NJ89_1827528	2198 2NJ89_1827528	OVERHEAD	2NJ89	10	400	406 -
2199 2NJ85_1823986	2199 2NJ85_1823986	OVERHEAD	2NJ85	10	404	410 -
2200 2NJ71_1827527	2200 2NJ71_1827527	OVERHEAD	2NJ71	10	413	419 -
2201 2NJ64_1864604	2201 2NJ64_1864604	OVERHEAD	2NJ64	10	423	429 -
2202 2NJ55_1874382	2202 2NJ55_1874382	OVERHEAD	2NJ55	10	431	438 -
2203 2NJ52_1827522	2203 2NJ52_1827522	OVERHEAD	2NJ52	10	434	441 -
2215 2NJ35_1827518	2215 2NJ35_1827518	OVERHEAD	2NJ35	10	410	417 -
2217 2NJ42_1827519	2217 2NJ42_1827519	OVERHEAD	2NJ42	10	409	415 -

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2239 10DN01_1873690	2239 10DN01_1873690	OVERHEAD	10DN01	10	400	406	-
2240 18EF74_108925074	2240 18EF74_108925074	OVERHEAD	18EF74	10	405	411	-
2241 2NJ40_1823983	2241 2NJ40_1823983	OVERHEAD	2NJ40	10	408	415	-
2242 2NJ18_1827363	2242 2NJ18_1827363	OVERHEAD	2NJ18	10	428	435	-
2248 2NJ15_1827362	2248 2NJ15_1827362	OVERHEAD	2NJ15	10	432	439	-
2250 2NJ20_1827364	2250 2NJ20_1827364	OVERHEAD	2NJ20	10	431	438	-
2251 2NJ10_1827524	2251 2NJ10_1827524	OVERHEAD	2NJ10	10	436	443	-
2252 2NJ06_1827520	2252 2NJ06_1827520	OVERHEAD	2NJ06	10	438	446	-
2253 2NJ05_1827523	2253 2NJ05_1827523	OVERHEAD	2NJ05	10	440	448	-
2254 2NJ03_1827517	2254 2NJ03_1827517	OVERHEAD	2NJ03	10	443	451	-
2255 2NH98_1827516	2255 2NH98_1827516	OVERHEAD	2NH98	10	447	455	-
2257 2NJ01_1827361	2257 2NJ01_1827361	OVERHEAD	2NJ01	10	447	455	-
2258 2NH78_1878853	2258 2NH78_1878853	OVERHEAD	2NH78	20	481	490	-
2259 2NH71_1811923	2259 2NH71_1811923	OVERHEAD	2NH71	10	487	496	-
2263 2NH68_1811922	2263 2NH68_1811922	OVERHEAD	2NH68	20	489	498	-
2264 2NH63_1811851	2264 2NH63_1811851	OVERHEAD	2NH63	10	497	507	-
2265 2NH61_1811850	2265 2NH61_1811850	OVERHEAD	2NH61	10	499	508	-
2266 2NH58_1811849	2266 2NH58_1811849	OVERHEAD	2NH58	10	504	514	-
2269 2NH56_1811848	2269 2NH56_1811848	OVERHEAD	2NH56	10	504	514	-
2273 2NH52_1811847	2273 2NH52_1811847	OVERHEAD	2NH52	10	503	513	-
2277 149481_1782554	2277 149481_1782554	OVERHEAD	149481	10	517	527	-
2279 2NH45_1710772	2279 2NH45_1710772	OVERHEAD	2NH45	10	515	525	-
2282 2NH33_1710770	2282 2NH33_1710770	OVERHEAD	2NH33	10	522	532	-
2283 2NH30_1710769	2283 2NH30_1710769	OVERHEAD	2NH30	10	529	539	-
2284 2NH28_1710768	2284 2NH28_1710768	OVERHEAD	2NH28	10	530	541	-
2286 2NG81_1710767	2286 2NG81_1710767	OVERHEAD	2NG81	10	541	552	-
2299 2P965_1710733	2299 2P965_1710733	OVERHEAD	2P965	10	512	521	-
2300 2NH15_1710731	2300 2NH15_1710731	OVERHEAD	2NH15	10	523	533	-
2313 1CLB60_114624451	2313 1CLB60_114624451	OVERHEAD	1CLB60	10	506	516	-
2317 1CLB61_114624467	2317 1CLB61_114624467	OVERHEAD	1CLB61	10	502	511	-
2319 2NH21_1710729	2319 2NH21_1710729	OVERHEAD	2NH21	10	517	527	-
2320 2NH19_1710728	2320 2NH19_1710728	OVERHEAD	2NH19	10	520	530	-
2326 2N826_1710732	2326 2N826_1710732	OVERHEAD	2N826	10	512	522	-
2327 2NY86_104659007	2327 2NY86_104659007	OVERHEAD	2NY86	10	521	531	-
2330 2P997_1766050	2330 2P997_1766050	OVERHEAD	2P997	10	524	534	-
2332 2P996_1710730	2332 2P996_1710730	OVERHEAD	2P996	10	526	537	-
2333 2NG74_1710725	2333 2NG74_1710725	OVERHEAD	2NG74	10	552	563	-
2334 2NG69_1710722	2334 2NG69_1710722	OVERHEAD	2NG69	10	558	570	-
2335 2NG38_1710663	2335 2NG38_1710663	OVERHEAD	2NG38	10	588	601	-
2336 2NG35_1710662	2336 2NG35_1710662	OVERHEAD	2NG35	10	592	605	-
2338 8N667_1767003	2338 8N667_1767003	OVERHEAD	8N667	10	595	608	-
2339 2NG32_1710661	2339 2NG32_1710661	OVERHEAD	2NG32	10	597	610	-
2340 2NG31_1710622	2340 2NG31_1710622	OVERHEAD	2NG31	10	601	615	-
2341 2NG30_1710621	2341 2NG30_1710621	OVERHEAD	2NG30	10	603	617	-
2342 2NG28_1710620	2342 2NG28_1710620	OVERHEAD	2NG28	10	608	622	-
2350 15K869_103731249	2350 15K869_103731249	OVERHEAD	15K869	10	602	615	-
2352 5FR05_1710623	2352 5FR05_1710623	OVERHEAD	5FR05	10	608	622	-
2353 2NG26_1771707	2353 2NG26_1771707	OVERHEAD	2NG26	10	616	630	-
2354 2NG23_1710619	2354 2NG23_1710619	OVERHEAD	2NG23	10	620	634	-
2355 2NG21_1710618	2355 2NG21_1710618	OVERHEAD	2NG21	10	625	640	-
2356 2NG20_1710617	2356 2NG20_1710617	OVERHEAD	2NG20	10	629	644	-
2357 2NF98_1710558	2357 2NF98_1710558	OVERHEAD	2NF98	10	642	657	-
2358 2NF95_1710557	2358 2NF95_1710557	OVERHEAD	2NF95	10	651	667	-
2359 2NE43_1710556	2359 2NE43_1710556	OVERHEAD	2NE43	10	655	671	-
2360 2NE40_1710555	2360 2NE40_1710555	OVERHEAD	2NE40	30	658	674	-
2364 10AE82_1771661	2364 10AE82_1771661	OVERHEAD	10AE82	10	655	671	-
2365 2NE39_1710554	2365 2NE39_1710554	OVERHEAD	2NE39	10	661	677	-
2366 2NE34_1710553	2366 2NE34_1710553	OVERHEAD	2NE34	10	666	683	-
2376 2NE26_1710525	2376 2NE26_1710525	OVERHEAD	2NE26	10	669	686	-
2377 2NE24_1710524	2377 2NE24_1710524	OVERHEAD	2NE24	10	674	691	-
2388 2NE23_1710551	2388 2NE23_1710551	OVERHEAD	2NE23	10	627	642	-
2389 2NE19_1783116	2389 2NE19_1783116	OVERHEAD	2NE19	30	649	665	-
2394 15NC73_103841836	2394 15NC73_103841836	OVERHEAD	15NC73	10	671	688	-
2398 186P66_104736871	2398 186P66_104736871	OVERHEAD	186P66	10	665	682	-
2403 7JP51_1763528	2403 7JP51_1763528	OVERHEAD	7JP51	10	658	674	-
2404 7JP50_1764013	2404 7JP50_1764013	OVERHEAD	7JP50	10	661	677	-
2405 2NE11_1710522	2405 2NE11_1710522	OVERHEAD	2NE11	10	674	691	-
2406 2NE09_1710521	2406 2NE09_1710521	OVERHEAD	2NE09	10	676	693	-
2407 2NE06_1710520	2407 2NE06_1710520	OVERHEAD	2NE06	10	686	703	-
2408 2NE04_1710519	2408 2NE04_1710519	OVERHEAD	2NE04	10	692	710	-
2409 2NE02_1710518	2409 2NE02_1710518	OVERHEAD	2NE02	10	695	713	-
2413 2ND81_1710515	2413 2ND81_1710515	OVERHEAD	2ND81	10	694	712	-
2414 2ND80_1710514	2414 2ND80_1710514	OVERHEAD	2ND80	10	696	714	-
2431 2NE01_1710552	2431 2NE01_1710552	OVERHEAD	2NE01	10	634	649	-

2432 2ND93__1772573	2432 2ND93__1772573	OVERHEAD	2ND93	10	672	689 -
2433 2ND91__1710511	2433 2ND91__1710511	OVERHEAD	2ND91	10	677	694 -
2434 2ND88__1710517	2434 2ND88__1710517	OVERHEAD	2ND88	10	684	701 -
2435 2ND83__1710516	2435 2ND83__1710516	OVERHEAD	2ND83	10	693	711 -
2436 2ND77__1710513	2436 2ND77__1710513	OVERHEAD	2ND77	10	708	727 -
2442 2N705__1710527	2442 2N705__1710527	OVERHEAD	2N705	10	700	718 -
2443 2ND75__1710512	2443 2ND75__1710512	OVERHEAD	2ND75	10	715	733 -
2446 2ND74__1710501	2446 2ND74__1710501	OVERHEAD	2ND74	10	718	738 -
2447 2ND70__1710500	2447 2ND70__1710500	OVERHEAD	2ND70	10	742	763 -
2448 2ND67__1710499	2448 2ND67__1710499	OVERHEAD	2ND67	10	756	778 -
2449 2ND53__1710498	2449 2ND53__1710498	OVERHEAD	2ND53	10	762	784 -
2456 2ND60__1773394	2456 2ND60__1773394	OVERHEAD	2ND60	10	737	757 -
2465 2ND66__1710502	2465 2ND66__1710502	OVERHEAD	2ND66	10	726	746 -
2466 6YW46__1764556	2466 6YW46__1764556	OVERHEAD	6YW46	10	735	755 -
2467 2ND51__1710497	2467 2ND51__1710497	OVERHEAD	2ND51	10	769	790 -
2468 2ND45__1710477	2468 2ND45__1710477	OVERHEAD	2ND45	10	775	797 -
2469 2X097__1710478	2469 2X097__1710478	OVERHEAD	2X097	10	780	802 -
2470 2ND35__1710473	2470 2ND35__1710473	OVERHEAD	2ND35	10	808	832 -
2476 2ND03__1710471	2476 2ND03__1710471	OVERHEAD	2ND03	10	800	824 -
2493 17EM15__104222241	2493 17EM15__104222241	OVERHEAD	17EM15	10	753	774 -
2494 2ND19__1710435	2494 2ND19__1710435	OVERHEAD	2ND19	10	758	779 -
2495 2ND14__1710430	2495 2ND14__1710430	OVERHEAD	2ND14	10	797	820 -
2501 2ND27__1710433	2501 2ND27__1710433	OVERHEAD	2ND27	10	772	794 -
2503 2ND24__103108968	2503 2ND24__103108968	OVERHEAD	2ND24	10	786	808 -
2504 2ND22__1710432	2504 2ND22__1710432	OVERHEAD	2ND22	10	791	814 -
2505 2ND20__1710431	2505 2ND20__1710431	OVERHEAD	2ND20	10	799	822 -
2506 2ND09__113424995	2506 2ND09__113424995	OVERHEAD	2ND09	10	817	842 -
2507 2ND08__1710472	2507 2ND08__1710472	OVERHEAD	2ND08	10	821	845 -
2508 2NC95__1710428	2508 2NC95__1710428	OVERHEAD	2NC95	10	850	877 -
2509 2NC93__1710427	2509 2NC93__1710427	OVERHEAD	2NC93	10	859	886 -
2510 2NC88__1710425	2510 2NC88__1710425	OVERHEAD	2NC88	10	875	902 -
2517 2N643__1710429	2517 2N643__1710429	OVERHEAD	2N643	10	861	888 -
2520 2NC50__1710422	2520 2NC50__1710422	OVERHEAD	2NC50	10	859	886 -
2536 2NC65__1710322	2536 2NC65__1710322	OVERHEAD	2NC65	10	793	816 -
2537 2NC63__1710321	2537 2NC63__1710321	OVERHEAD	2NC63	10	802	825 -
2547 11C212__1774814	2547 11C212__1774814	OVERHEAD	11C212	10	779	801 -
2550 11H135__1775355	2550 11H135__1775355	OVERHEAD	11H135	10	776	799 -
2551 11H134__1775354	2551 11H134__1775354	OVERHEAD	11H134	10	779	802 -
2552 10W810__104574825	2552 10W810__104574825	OVERHEAD	10W810	10	784	807 -
2553 191H52__108330284	2553 191H52__108330284	OVERHEAD	191H52	10	786	809 -
2554 10W809__1783769	2554 10W809__1783769	OVERHEAD	10W809	10	790	813 -
2556 13BT27__1780508	2556 13BT27__1780508	OVERHEAD	13BT27	10	791	814 -
2559 13LG34__1781137	2559 13LG34__1781137	OVERHEAD	13LG34	10	787	809 -
2560 13BT28__106405305	2560 13BT28__106405305	OVERHEAD	13BT28	10	791	814 -
2561 10W789__1774633	2561 10W789__1774633	OVERHEAD	10W789	10	796	819 -
2562 10W770__104145701	2562 10W770__104145701	OVERHEAD	10W770	10	804	828 -
2563 9LG81__1769954	2563 9LG81__1769954	OVERHEAD	9LG81	10	821	846 -
2564 9LG82__1710327	2564 9LG82__1710327	OVERHEAD	9LG82	10	824	849 -
2567 2NC57__1710325	2567 2NC57__1710325	OVERHEAD	2NC57	10	827	852 -
2568 2NC54__1710324	2568 2NC54__1710324	OVERHEAD	2NC54	10	830	856 -
2589 6P545__1762548	2589 6P545__1762548	OVERHEAD	6P545	10	731	751 -
2591 86R29__1765829	2591 86R29__1765829	OVERHEAD	86R29	10	738	758 -
2592 2N462__1774776	2592 2N462__1774776	OVERHEAD	2N462	10	743	764 -
2593 77B54__103704226	2593 77B54__103704226	OVERHEAD	77B54	10	749	770 -
2594 77B53__103704225	2594 77B53__103704225	OVERHEAD	77B53	10	756	778 -
2595 2NC80__1710332	2595 2NC80__1710332	OVERHEAD	2NC80	10	765	787 -
2596 2NC79__1710331	2596 2NC79__1710331	OVERHEAD	2NC79	10	771	793 -
2597 2NC77__1710330	2597 2NC77__1710330	OVERHEAD	2NC77	10	776	799 -
2598 2NC75__1710329	2598 2NC75__1710329	OVERHEAD	2NC75	10	782	804 -
2601 2NC83__1710333	2601 2NC83__1710333	OVERHEAD	2NC83	10	775	797 -
2602 2NC68__103704220	2602 2NC68__103704220	OVERHEAD	2NC68	10	816	840 -
2603 2NC66__1710328	2603 2NC66__1710328	OVERHEAD	2NC66	10	821	846 -
2604 17AL98__104017200	2604 17AL98__104017200	OVERHEAD	17AL98	10	843	869 -
2605 2NC46__1710421	2605 2NC46__1710421	OVERHEAD	2NC46	10	872	899 -
2606 2NC39__1710420	2606 2NC39__1710420	OVERHEAD	2NC39	10	909	939 -
2607 2NC35__1710419	2607 2NC35__1710419	OVERHEAD	2NC35	10	930	961 -
2617 2N406__1710469	2617 2N406__1710469	OVERHEAD	2N406	10	876	904 -
2622 50140__1710418	2622 50140__1710418	OVERHEAD	50140	10	959	992 -
2625 72Y66__1765238	2625 72Y66__1765238	OVERHEAD	72Y66	10	954	987 -
2626 2NC26__1710417	2626 2NC26__1710417	OVERHEAD	2NC26	10	988	1023 -
2627 2NC23__1710320	2627 2NC23__1710320	OVERHEAD	2NC23	10	1000	1037 -
2630 1CSA22__113483399	2630 1CSA22__113483399	OVERHEAD	1CSA22	10	999	1035 -
2639 2NC22__1710413	2639 2NC22__1710413	OVERHEAD	2NC22	10	957	990 -
2640 2NC21__1710412	2640 2NC21__1710412	OVERHEAD	2NC21	10	964	997 -

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2645 5S255_1774795	2645 5S255_1774795	OVERHEAD	5S255	10	944	976 -
2646 2NC13_104135164	2646 2NC13_104135164	OVERHEAD	2NC13	10	1014	1051 -
2647 2NB83_1710319	2647 2NB83_1710319	OVERHEAD	2NB83	10	1026	1064 -
2659 2NB98_1710409	2659 2NB98_1710409	OVERHEAD	2NB98	10	951	984 -
2662 2X186_1710416	2662 2X186_1710416	OVERHEAD	2X186	10	952	985 -
2663 2NB96_1710414	2663 2NB96_1710414	OVERHEAD	2NB96	10	960	994 -
2670 2NC11_1710408	2670 2NC11_1710408	OVERHEAD	2NC11	10	917	947 -
2671 2NC10_1710407	2671 2NC10_1710407	OVERHEAD	2NC10	10	925	956 -
2672 2NC07_1710406	2672 2NC07_1710406	OVERHEAD	2NC07	10	934	965 -
2675 2NC04_1710411	2675 2NC04_1710411	OVERHEAD	2NC04	10	934	966 -
2676 2NC02_1710410	2676 2NC02_1710410	OVERHEAD	2NC02	10	942	975 -
2677 2Q937_1710415	2677 2Q937_1710415	OVERHEAD	2Q937	10	950	983 -
2678 2NB88_1710318	2678 2NB88_1710318	OVERHEAD	2NB88	10	1008	1045 -
2679 2NB78_1710317	2679 2NB78_1710317	OVERHEAD	2NB78	10	1079	1121 -
2687 2NB77_1710316	2687 2NB77_1710316	OVERHEAD	2NB77	10	1092	1135 -
2688 2NB76_1777261	2688 2NB76_1777261	OVERHEAD	2NB76	10	1105	1148 -
2697 2NB52_1710312	2697 2NB52_1710312	OVERHEAD	2NB52	10	1067	1107 -
2703 2NB59_1710315	2703 2NB59_1710315	OVERHEAD	2NB59	10	1004	1041 -
2704 2NB53_1710314	2704 2NB53_1710314	OVERHEAD	2NB53	10	1058	1099 -
2712 2NB67_1710402	2712 2NB67_1710402	OVERHEAD	2NB67	10	1012	1049 -
2717 2NB72_1710405	2717 2NB72_1710405	OVERHEAD	2NB72	10	1020	1058 -
2718 2NB70_1710404	2718 2NB70_1710404	OVERHEAD	2NB70	10	1028	1066 -
2719 2NB69_1710403	2719 2NB69_1710403	OVERHEAD	2NB69	10	1036	1075 -
2720 2NB63_1710313	2720 2NB63_1710313	OVERHEAD	2NB63	10	1057	1098 -
2721 2Q930_1710311	2721 2Q930_1710311	OVERHEAD	2Q930	10	1107	1151 -
2722 2NA89_1710184	2722 2NA89_1710184	OVERHEAD	2NA89	10	1186	1236 -
2723 2NA88_1710183	2723 2NA88_1710183	OVERHEAD	2NA88	10	1202	1253 -
2730 2NA74_1710181	2730 2NA74_1710181	OVERHEAD	2NA74	10	1133	1179 -
2742 2NA87_1710090	2742 2NA87_1710090	OVERHEAD	2NA87	10	1045	1084 -
2743 2NA86_1768234	2743 2NA86_1768234	OVERHEAD	2NA86	10	1053	1093 -
2747 13PK13_1781406	2747 13PK13_1781406	OVERHEAD	13PK13	10	1056	1096 -
2748 2NA85_104381615	2748 2NA85_104381615	OVERHEAD	2NA85	10	1062	1102 -
2749 2NA81_1710180	2749 2NA81_1710180	OVERHEAD	2NA81	10	1088	1130 -
2750 2NA75_1710182	2750 2NA75_1710182	OVERHEAD	2NA75	10	1136	1182 -
2754 73572_1762647	2754 73572_1762647	OVERHEAD	73572	10	1128	1173 -
2755 73571_1762646	2755 73571_1762646	OVERHEAD	73571	10	1136	1182 -
2756 73570_1762648	2756 73570_1762648	OVERHEAD	73570	10	1145	1191 -
2761 2NA67_1710310	2761 2NA67_1710310	OVERHEAD	2NA67	10	1200	1251 -
2762 2NA66_1710309	2762 2NA66_1710309	OVERHEAD	2NA66	10	1214	1266 -
2763 2NA65_1710308	2763 2NA65_1710308	OVERHEAD	2NA65	10	1227	1280 -
2764 2NA61_1710307	2764 2NA61_1710307	OVERHEAD	2NA61	10	1259	1314 -
2765 2NA59_1710306	2765 2NA59_1710306	OVERHEAD	2NA59	10	1269	1326 -
2766 2NA57_1710305	2766 2NA57_1710305	OVERHEAD	2NA57	10	1280	1337 -
2767 2NA54_1773287	2767 2NA54_1773287	OVERHEAD	2NA54	10	1322	1383 -
2768 2NA52_103045967	2768 2NA52_103045967	OVERHEAD	2NA52	30	1361	1425 -
2769 75A51_1771701	2769 75A51_1771701	OVERHEAD	75A51	30	1369	1434 -
2770 2NA51_104537460	2770 2NA51_104537460	OVERHEAD	2NA51	10	1384	1451 -
2771 2NA50_1767192	2771 2NA50_1767192	OVERHEAD	2NA50	30	1407	1476 -
2775 9EL30_1768818	2775 9EL30_1768818	OVERHEAD	9EL30	30	1407	1475 -
2776 2NB50_1769710	2776 2NB50_1769710	OVERHEAD	2NB50	10	1458	1531 -
2789 2NA40_1710179	2789 2NA40_1710179	OVERHEAD	2NA40	10	1292	1351 -
2795 8YP81_1774185	2795 8YP81_1774185	OVERHEAD	8YP81	10	1284	1341 -
2796 8YP79_1774184	2796 8YP79_1774184	OVERHEAD	8YP79	10	1309	1369 -
2799 2NA36_1710178	2799 2NA36_1710178	OVERHEAD	2NA36	10	1339	1401 -
2800 2NA28_1710177	2800 2NA28_1710177	OVERHEAD	2NA28	10	1428	1498 -
2826 2KW13_1710468	2826 2KW13_1710468	OVERHEAD	2KW13	10	1194	1245 -
2828 2KW07_1774875	2828 2KW07_1774875	OVERHEAD	2KW07	10	1264	1321 -
2830 7RT85_1774770	2830 7RT85_1774770	OVERHEAD	7RT85	30	1262	1340 -
2833 2KV93_1764895	2833 2KV93_1764895	OVERHEAD	2KV93	10	1289	1347 -
2848 2KW00_1710397	2848 2KW00_1710397	OVERHEAD	2KW00	10	1179	1228 -
2849 2KV98_1710396	2849 2KV98_1710396	OVERHEAD	2KV98	10	1187	1237 -
2861 15J373_103649998	2861 15J373_103649998	OVERHEAD	15J373	10	1206	1257 -
2867 7W290_1764640	2867 7W290_1764640	OVERHEAD	7W290	10	1181	1231 -
2868 7RE99_104250005	2868 7RE99_104250005	OVERHEAD	7RE99	10	1204	1255 -
2872 7C005_1763031	2872 7C005_1763031	OVERHEAD	7C005	10	1258	1314 -
2873 79A64_1768358	2873 79A64_1768358	OVERHEAD	79A64	10	1278	1335 -
2876 2KV90_1710400	2876 2KV90_1710400	OVERHEAD	2KV90	10	1230	1381 -
2877 2KV87_1710399	2877 2KV87_1710399	OVERHEAD	2KV87	10	1345	1408 -
2878 2KV85_1710398	2878 2KV85_1710398	OVERHEAD	2KV85	10	1355	1419 -
2883 2N599_1764887	2883 2N599_1764887	OVERHEAD	2N599	10	1333	1396 -
2884 2N347_1764885	2884 2N347_1764885	OVERHEAD	2N347	10	1346	1409 -
2885 2N346_1764883	2885 2N346_1764883	OVERHEAD	2N346	10	1358	1422 -
2892 54640_1710401	2892 54640_1710401	OVERHEAD	54640	10	1288	1346 -
2893 2KV84_1774900	2893 2KV84_1774900	OVERHEAD	2KV84	10	1382	1448 -

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2894 2KV83_1774899	2894 2KV83_1774899	OVERHEAD	2KV83	1Ø	1402	1470 -
2895 2KV82_1764878	2895 2KV82_1764878	OVERHEAD	2KV82	1Ø	1424	1494 -
2898 2KV79_1764876	2898 2KV79_1764876	OVERHEAD	2KV79	1Ø	1437	1508 -
2899 2KV78_1710304	2899 2KV78_1710304	OVERHEAD	2KV78	1Ø	1461	1534 -
2900 2KV75_1710303	2900 2KV75_1710303	OVERHEAD	2KV75	1Ø	1509	1587 -
2901 2KV14_1710299	2901 2KV14_1710299	OVERHEAD	2KV14	1Ø	1564	1646 -
2909 2KV24_1710302	2909 2KV24_1710302	OVERHEAD	2KV24	1Ø	1477	1551 -
2922 2KV39_1710297	2922 2KV39_1710297	OVERHEAD	2KV39	1Ø	1325	1386 -
2926 2KV46_1710298	2926 2KV46_1710298	OVERHEAD	2KV46	1Ø	1313	1373 -
2927 2KV43_1764284	2927 2KV43_1764284	OVERHEAD	2KV43	1Ø	1331	1392 -
2928 2KV37_1710296	2928 2KV37_1710296	OVERHEAD	2KV37	1Ø	1341	1403 -
2929 2KV35_1710295	2929 2KV35_1710295	OVERHEAD	2KV35	1Ø	1359	1423 -
2930 2KV33_1710294	2930 2KV33_1710294	OVERHEAD	2KV33	1Ø	1370	1435 -
2931 2KV32_1710293	2931 2KV32_1710293	OVERHEAD	2KV32	1Ø	1379	1444 -
2932 2KV31_1710292	2932 2KV31_1710292	OVERHEAD	2KV31	1Ø	1402	1470 -
2938 2KV54_1710156	2938 2KV54_1710156	OVERHEAD	2KV54	1Ø	1333	1395 -
2944 2KV62_1710152	2944 2KV62_1710152	OVERHEAD	2KV62	1Ø	1291	1349 -
2949 2KV67_1710153	2949 2KV67_1710153	OVERHEAD	2KV67	1Ø	1226	1279 -
2950 2KV64_1783247	2950 2KV64_1783247	OVERHEAD	2KV64	1Ø	1281	1338 -
2951 2KV60_1710151	2951 2KV60_1710151	OVERHEAD	2KV60	1Ø	1299	1358 -
2954 2KV69_1710154	2954 2KV69_1710154	OVERHEAD	2KV69	1Ø	1282	1339 -
2955 2KV68_1777535	2955 2KV68_1777535	OVERHEAD	2KV68	1Ø	1294	1352 -
2956 2KV57_1710150	2956 2KV57_1710150	OVERHEAD	2KV57	1Ø	1316	1377 -
2957 2KV55_1710157	2957 2KV55_1710157	OVERHEAD	2KV55	1Ø	1333	1394 -
2960 5TE89_1710160	2960 5TE89_1710160	OVERHEAD	5TE89	1Ø	1318	1378 -
2961 2KV49_1710155	2961 2KV49_1710155	OVERHEAD	2KV49	1Ø	1361	1425 -
2965 95888_1768172	2965 95888_1768172	OVERHEAD	95888	1Ø	1352	1415 -
2966 57R23_1710161	2966 57R23_1710161	OVERHEAD	57R23	1Ø	1364	1429 -
2967 2N793_1710159	2967 2N793_1710159	OVERHEAD	2N793	1Ø	1380	1446 -
2969 2KV20_1710301	2969 2KV20_1710301	OVERHEAD	2KV20	1Ø	1521	1600 -
2970 2KV17_1710300	2970 2KV17_1710300	OVERHEAD	2KV17	1Ø	1548	1629 -
2974 2KV72_1710176	2974 2KV72_1710176	OVERHEAD	2KV72	1Ø	1477	1551 -
2975 17YW29_104568192	2975 17YW29_104568192	OVERHEAD	17YW29	1Ø	1618	1705 -
2976 2KV06_1710175	2976 2KV06_1710175	OVERHEAD	2KV06	1Ø	1708	1805 -
2980 18EQ18_105929734	2980 18EQ18_105929734	OVERHEAD	18EQ18	1Ø	1752	1853 -
2981 2KV02_1710174	2981 2KV02_1710174	OVERHEAD	2KV02	1Ø	1765	1867 -
2982 2KU98_1710173	2982 2KU98_1710173	OVERHEAD	2KU98	1Ø	1823	1930 New
2983 2KU94_1710172	2983 2KU94_1710172	OVERHEAD	2KU94	1Ø	1842	1951 New
2984 2KU91_1710171	2984 2KU91_1710171	OVERHEAD	2KU91	1Ø	1862	1974 New
2985 2KU89_1710087	2985 2KU89_1710087	OVERHEAD	2KU89	1Ø	1880	1993 New
2986 2KU86_1710085	2986 2KU86_1710085	OVERHEAD	2KU86	1Ø	1903	2018 New
2987 15LF06_103790063	2987 15LF06_103790063	OVERHEAD	15LF06	1Ø	1969	2091 New
2988 2KU83_1710084	2988 2KU83_1710084	OVERHEAD	2KU83	1Ø	1990	2114 New
2989 2KU79_1710083	2989 2KU79_1710083	OVERHEAD	2KU79	1Ø	2062	2193 -
2992 2KU73_1710086	2992 2KU73_1710086	OVERHEAD	2KU73	1Ø	2135	2274 -
2994 2KU69_1710081	2994 2KU69_1710081	OVERHEAD	2KU69	1Ø	2165	2306 -
2995 2KU67_1710080	2995 2KU67_1710080	OVERHEAD	2KU67	1Ø	2217	2363 -
2999 2KU65_1709977	2999 2KU65_1709977	OVERHEAD	2KU65	1Ø	2246	2395 -
3000 2KU63_1709976	3000 2KU63_1709976	OVERHEAD	2KU63	1Ø	2310	2465 -
3001 2KU60_1709975	3001 2KU60_1709975	OVERHEAD	2KU60	1Ø	2413	2578 -
3005 10FP45_1772235	3005 10FP45_1772235	OVERHEAD	10FP45	1Ø	2346	2505 -
3006 2KU58_1709974	3006 2KU58_1709974	OVERHEAD	2KU58	1Ø	2458	2626 -
3007 2KU52_1709958	3007 2KU52_1709958	OVERHEAD	2KU52	1Ø	2549	2725 -
3008 2KU48_1709957	3008 2KU48_1709957	OVERHEAD	2KU48	1Ø	2580	2759 -
3011 2M725_1709967	3011 2M725_1709967	OVERHEAD	2M725	1Ø	2643	2827 -
3017 135299_1779990	3017 135299_1779990	OVERHEAD	135299	1Ø	2475	2703 -
3043 2M906_1710000	3189 2M906_1710000	OVERHEAD	2M906	1Ø	1667	1895 -
3077 15MD96_103827390	3223 15MD96_103827390	OVERHEAD	15MD96	1Ø	1183	1310 -
3081 117X01_1774454	3227 117X01_1774454	OVERHEAD	117X01	1Ø	1213	1345 -
3082 2KU46_1710022	3228 2KU46_1710022	OVERHEAD	2KU46	1Ø	1223	1357 -
3083 2KU44_115164757	3229 2KU44_115164757	OVERHEAD	2KU44	1Ø	1252	1392 -
3086 2KU41_1710020	3232 2KU41_1710020	OVERHEAD	2KU41	1Ø	1273	1418 -
3090 2Q993_1709838	3236 2Q993_1709838	OVERHEAD	2Q993	3Ø	1263	1406 -
3094 89554_1769367	3240 89554_1769367	OVERHEAD	89554	1Ø	1261	1403 -
3098 2KU36_1710018	3244 2KU36_1710018	OVERHEAD	2KU36	1Ø	1284	1431 -
3102 2KU35_1710017	3248 2KU35_1710017	OVERHEAD	2KU35	1Ø	1299	1448 -
3105 7J371_1763523	3251 7J371_1763523	OVERHEAD	7J371	1Ø	1385	1552 -
3106 2KU22_1710008	3252 2KU22_1710008	OVERHEAD	2KU22	1Ø	1419	1594 -
3107 2KU19_1710007	3253 2KU19_1710007	OVERHEAD	2KU19	1Ø	1440	1619 -
3109 2M924_1710009	3255 2M924_1710009	OVERHEAD	2M924	1Ø	1458	1641 -
3115 2M931_1710012	3261 2M931_1710012	OVERHEAD	2M931	1Ø	1394	1565 -
3116 2M928_1710011	3262 2M928_1710011	OVERHEAD	2M928	1Ø	1412	1585 -
3149 2KU16_1710192	3295 2KU16_1710192	OVERHEAD	2KU16	1Ø	1041	1142 -
3151 2KU13_1710191	3297 2KU13_1710191	OVERHEAD	2KU13	1Ø	1052	1155 -

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3152 2KU12_1710190	3298 2KU12_1710190	OVERHEAD	2KU12	10	1057	1161 -
3153 2KU08_1710189	3299 2KU08_1710189	OVERHEAD	2KU08	10	1092	1202 -
3154 2KU07_1710188	3300 2KU07_1710188	OVERHEAD	2KU07	10	1096	1206 -
3155 2KU06_1710187	3301 2KU06_1710187	OVERHEAD	2KU06	10	1105	1217 -
3166 2KU01_1710186	3312 2KU01_1710186	OVERHEAD	2KU01	10	1043	1143 -
3167 2KU00_1765000	3313 2KU00_1765000	OVERHEAD	2KU00	10	1050	1152 -
3170 8XE60_1767684	3316 8XE60_1767684	OVERHEAD	8XE60	10	1041	1142 -
3171 2M998_1710198	3317 2M998_1710198	OVERHEAD	2M998	10	1070	1175 -
3172 2M997_1710195	3318 2M997_1710195	OVERHEAD	2M997	10	1076	1183 -
3174 SZV27_1710197	3320 SZV27_1710197	OVERHEAD	SZV27	10	1080	1188 -
3175 2M992_1710194	3321 2M992_1710194	OVERHEAD	2M992	10	1101	1212 -
3176 2M988_1710193	3322 2M988_1710193	OVERHEAD	2M988	10	1114	1228 -
3177 2M987_1710196	3323 2M987_1710196	OVERHEAD	2M987	10	1128	1245 -
3184 101T66_1770709	3330 101T66_1770709	OVERHEAD	101T66	10	1101	1213 -
3185 2M986_1710185	3331 2M986_1710185	OVERHEAD	2M986	10	1140	1259 -
3186 2M983_1710101	3332 2M983_1710101	OVERHEAD	2M983	10	1155	1277 -
3187 2M980_1710100	3333 2M980_1710100	OVERHEAD	2M980	10	1184	1311 -
3188 2M978_1710099	3334 2M978_1710099	OVERHEAD	2M978	10	1201	1331 -
3189 2M977_1710098	3335 2M977_1710098	OVERHEAD	2M977	10	1218	1352 -
3190 2M969_1710096	3336 2M969_1710096	OVERHEAD	2M969	10	1237	1374 -
3198 2M975_1710103	3344 2M975_1710103	OVERHEAD	2M975	10	1077	1190 -
3199 2M971_1710097	3345 2M971_1710097	OVERHEAD	2M971	10	1127	1248 -
3200 2M970_1774491	3346 2M970_1774491	OVERHEAD	2M970	10	1187	1317 -
3201 2M968_1710095	3347 2M968_1710095	OVERHEAD	2M968	10	1244	1383 -
3202 2M954_1710094	3348 2M954_1710094	OVERHEAD	2M954	10	1252	1393 -
3215 2M966_1710102	3361 2M966_1710102	OVERHEAD	2M966	10	1102	1214 -
3216 2M960_1774777	3362 2M960_1774777	OVERHEAD	2M960	10	1168	1293 -
3217 2M952_1710093	3363 2M952_1710093	OVERHEAD	2M952	10	1259	1401 -
3218 2M944_1710092	3364 2M944_1710092	OVERHEAD	2M944	10	1285	1433 -
3227 PAY78_1710019	3373 PAY78_1710019	OVERHEAD	PAY78	10	1151	1275 -
3228 2M949_1710016	3374 2M949_1710016	OVERHEAD	2M949	10	1172	1300 -
3231 2N440_1710021	3377 2N440_1710021	OVERHEAD	2N440	10	1159	1285 -
3232 2N438_108854469	3378 2N438_108854469	OVERHEAD	2N438	10	1181	1311 -
3248 75C56_1762949	3394 75C56_1762949	OVERHEAD	75C56	10	1133	1250 -
3249 2M940_1710015	3395 2M940_1710015	OVERHEAD	2M940	10	1326	1482 -
3251 2M937_1710014	3397 2M937_1710014	OVERHEAD	2M937	10	1388	1557 -
3252 2M934_1710013	3398 2M934_1710013	OVERHEAD	2M934	10	1399	1570 -
3253 2M927_1710010	3399 2M927_1710010	OVERHEAD	2M927	10	1435	1613 -
3257 130188_1779526	3403 130188_1779526	OVERHEAD	130188	10	1417	1591 -
3259 2M921_1782944	3405 2M921_1782944	OVERHEAD	2M921	10	1500	1691 -
3260 2M917_1710006	3406 2M917_1710006	OVERHEAD	2M917	10	1529	1727 -
3261 2M914_1710005	3407 2M914_1710005	OVERHEAD	2M914	10	1567	1773 -
3262 2M912_1710004	3408 2M912_1710004	OVERHEAD	2M912	10	1588	1798 -
3263 2M909_1710001	3409 2M909_1710001	OVERHEAD	2M909	10	1636	1857 -
3264 2N619_1710002	3410 2N619_1710002	OVERHEAD	2N619	10	1645	1868 -
3265 2M903_1709999	3411 2M903_1709999	OVERHEAD	2M903	10	1694	1927 New
3269 2M901_1709998	3415 2M901_1709998	OVERHEAD	2M901	10	1716	1955 New
3270 2M898_1709997	3416 2M898_1709997	OVERHEAD	2M898	10	1752	1998 New
3273 2M897_1709996	3419 2M897_1709996	OVERHEAD	2M897	10	1748	1994 New
3274 2M890_1709995	3420 2M890_1709995	OVERHEAD	2M890	10	1921	2202 New
3275 2M885_1709993	3421 2M885_1709993	OVERHEAD	2M885	10	2026	2327 -
3276 2M803_1709990	3173 2M803_1709990	OVERHEAD	2M803	10	2106	2422 -
3289 2M823_1709821	3158 2M823_1709821	OVERHEAD	2M823	10	1744	2103 New
3290 2M822_1709820	3159 2M822_1709820	OVERHEAD	2M822	10	1768	2132 New
3304 105817_1771155	3051 105817_1771155	OVERHEAD	105817	10	1492	1889 -
3313 2M851_1709749	3064 2M851_1709749	OVERHEAD	2M851	10	1364	1727 -
3314 2M850_1709748	3065 2M850_1709748	OVERHEAD	2M850	10	1386	1757 -
3322 1CKX16_114992519	3073 1CKX16_114992519	OVERHEAD	1CKX16	10	1325	1671 -
3329 53609_1709753	3080 53609_1709753	OVERHEAD	53609	10	1272	1597 -
3330 2M864_1709752	3081 2M864_1709752	OVERHEAD	2M864	10	1284	1614 -
3331 2M863_1782214	3082 2M863_1782214	OVERHEAD	2M863	10	1296	1631 -
3332 2M854_1709751	3083 2M854_1709751	OVERHEAD	2M854	10	1393	1766 -
3333 2M852_1709750	3084 2M852_1709750	OVERHEAD	2M852	10	1415	1794 -
3347 188E08_104860899	3098 188E08_104860899	OVERHEAD	188E08	10	1279	1602 -
3350 5LX60_1709837	3101 5LX60_1709837	OVERHEAD	5LX60	10	1284	1610 -
3351 5LX59_104361181	3102 5LX59_104361181	OVERHEAD	5LX59	10	1297	1629 -
3352 1BXF93_112356001	3103 1BXF93_112356001	OVERHEAD	1BXF93	10	1349	1702 -
3353 5LX55_105929748	3104 5LX55_105929748	OVERHEAD	5LX55	10	1362	1720 -
3354 5LX54_105707814	3105 5LX54_105707814	OVERHEAD	5LX54	10	1381	1747 -
3355 5LX52_109449760	3106 5LX52_109449760	OVERHEAD	5LX52	10	1418	1799 -
3356 5LX51_104758376	3107 5LX51_104758376	OVERHEAD	5LX51	10	1438	1827 -
3357 2M846_1709829	3108 2M846_1709829	OVERHEAD	2M846	10	1465	1864 -
3358 2M845_1778509	3056 2M845_1778509	OVERHEAD	2M845	10	1486	1894 -
3359 2M843_1709828	3109 2M843_1709828	OVERHEAD	2M843	10	1512	1917 New

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3366	2M871_1709832	3116	2M871_1709832	OVERHEAD	2M871	10	1417	1788	-
3369	2M876_1709834	3119	2M876_1709834	OVERHEAD	2M876	10	1407	1772	-
3375	2M880_1710003	3125	2M880_1710003	OVERHEAD	2M880	10	1370	1722	-
3376	2M879_1775919	3126	2M879_1775919	OVERHEAD	2M879	10	1382	1738	-
3377	2M877_1709835	3127	2M877_1709835	OVERHEAD	2M877	10	1400	1763	-
3378	2M872_1709833	3128	2M872_1709833	OVERHEAD	2M872	10	1421	1793	-
3379	2M869_1709831	3129	2M869_1709831	OVERHEAD	2M869	10	1446	1827	-
3380	2M866_1709830	3130	2M866_1709830	OVERHEAD	2M866	10	1469	1859	-
3381	2M865_1764574	3131	2M865_1764574	OVERHEAD	2M865	10	1491	1889	-
3382	149A06_1782602	3132	149A06_1782602	OVERHEAD	149A06	10	1532	1935	New
3383	2M841_1709827	3133	2M841_1709827	OVERHEAD	2M841	10	1542	1944	New
3388	8N03_1778354	3139	8N03_1778354	OVERHEAD	8N03	10	1547	1942	New
3392	8N04_1778356	3143	8N04_1778356	OVERHEAD	8N04	10	1533	1926	New
3393	2M837_1709826	3144	2M837_1709826	OVERHEAD	2M837	10	1593	1990	New
3394	2M835_1709825	3145	2M835_1709825	OVERHEAD	2M835	10	1623	2017	New
3395	2M831_1709824	3146	2M831_1709824	OVERHEAD	2M831	10	1657	2046	New
3396	2M830_103783109	3147	2M830_103783109	OVERHEAD	2M830	10	1681	2067	New
3398	9N16_1769649	3151	9N16_1769649	OVERHEAD	9N16	10	1682	2059	New
3399	2M827_1709823	3148	2M827_1709823	OVERHEAD	2M827	10	1705	2089	New
3400	6LT98_1761109	3152	6LT98_1761109	OVERHEAD	6LT98	10	1718	2100	New
3401	2M824_1709822	3153	2M824_1709822	OVERHEAD	2M824	10	1762	2138	New
3402	2M819_1709819	3154	2M819_1709819	OVERHEAD	2M819	10	1801	2171	New
3403	2M816_1709818	3160	2M816_1709818	OVERHEAD	2M816	10	1879	2237	New
3409	6QA58_1761116	3168	6QA58_1761116	OVERHEAD	6QA58	10	1850	2179	New
3410	15D739_103407983	3169	15D739_103407983	OVERHEAD	15D739	10	1857	2187	New
3411	6QA55_103988740	3170	6QA55_103988740	OVERHEAD	6QA55	10	1901	2241	New
3412	2M813_1709817	3161	2M813_1709817	OVERHEAD	2M813	10	1935	2283	New
3413	2M808_1709992	3171	2M808_1709992	OVERHEAD	2M808	10	1993	2331	New
3414	2M805_1709991	3172	2M805_1709991	OVERHEAD	2M805	10	2035	2365	-
3415	2M800_1709989	3422	2M800_1709989	OVERHEAD	2M800	10	2141	2449	-
3416	2M771_1709984	3423	2M771_1709984	OVERHEAD	2M771	10	2200	2495	-
3431	2M790_1710088	3438	2M790_1710088	OVERHEAD	2M790	10	1843	2077	New
3432	10AJ02_1771741	3439	10AJ02_1771741	OVERHEAD	10AJ02	10	1860	2097	New
3433	2M788_103399171	3440	2M788_103399171	OVERHEAD	2M788	10	1883	2124	New
3441	2M798_1710091	3448	2M798_1710091	OVERHEAD	2M798	10	1871	1872	-
3442	2Q991_1710089	3449	2Q991_1710089	OVERHEAD	2Q991	10	1720	1931	New
3443	2M793_1769767	3450	2M793_1769767	OVERHEAD	2M793	10	1769	1989	New
3444	2M791_103936174	3451	2M791_103936174	OVERHEAD	2M791	10	1839	2072	New
3445	2M782_1709994	3452	2M782_1709994	OVERHEAD	2M782	10	1925	2174	New
3446	2M780_1709988	3453	2M780_1709988	OVERHEAD	2M780	10	1978	2237	New
3447	6BY83_1765761	3454	6BY83_1765761	OVERHEAD	6BY83	10	2022	2289	-
3448	2M777_1709987	3455	2M777_1709987	OVERHEAD	2M777	10	2050	2321	-
3449	2M776_1772600	3456	2M776_1772600	OVERHEAD	2M776	10	2079	2355	-
3450	2M775_1709986	3457	2M775_1709986	OVERHEAD	2M775	10	2103	2383	-
3451	2M774_1709985	3458	2M774_1709985	OVERHEAD	2M774	10	2147	2435	-
3458	2M767_1709983	3465	2M767_1709983	OVERHEAD	2M767	10	2111	2356	-
3459	2M765_1709982	3466	2M765_1709982	OVERHEAD	2M765	10	2182	2439	-
3460	2M761_1709981	3467	2M761_1709981	OVERHEAD	2M761	10	2295	2568	-
3461	2M757_1709980	3468	2M757_1709980	OVERHEAD	2M757	10	2342	2603	-
3462	2M756_1709979	3469	2M756_1709979	OVERHEAD	2M756	10	2399	2646	-
3463	2M752_1709978	3470	2M752_1709978	OVERHEAD	2M752	10	2427	2667	-
3467	2M748_1709970	3474	2M748_1709970	OVERHEAD	2M748	30	2588	2782	-
3471	2M724_1709966	3478	2M724_1709966	OVERHEAD	2M724	10	2606	2775	-
3472	2M719_1709964	3479	2M719_1709964	OVERHEAD	2M719	10	2701	2868	-
3473	2M717_1709963	3480	2M717_1709963	OVERHEAD	2M717	10	2769	2918	-
3474	2M716_1709962	3481	2M716_1709962	OVERHEAD	2M716	10	2840	2969	-
3475	2M695_1709954	3482	2M695_1709954	OVERHEAD	2M695	10	2966	3060	-
3487	2M710_1709811	3494	2M710_1709811	OVERHEAD	2M710	10	2603	2679	-
3493	2M714_1709814	3500	2M714_1709814	OVERHEAD	2M714	10	2519	2591	-
3494	2N109_1709816	3501	2N109_1709816	OVERHEAD	2N109	10	2547	2619	-
3495	2M713_1709813	3502	2M713_1709813	OVERHEAD	2M713	10	2575	2649	-
3496	2M712_1709812	3503	2M712_1709812	OVERHEAD	2M712	10	2616	2692	-
3497	2M711_1709815	3504	2M711_1709815	OVERHEAD	2M711	10	2662	2741	-
3498	2M705_1709810	3505	2M705_1709810	OVERHEAD	2M705	10	2712	2793	-
3500	2M702_1709804	3507	2M702_1709804	OVERHEAD	2M702	10	2777	2861	-
3501	2M700_1709806	3508	2M700_1709806	OVERHEAD	2M700	10	2813	2899	-
3502	2M698_1709955	3509	2M698_1709955	OVERHEAD	2M698	10	2891	2981	-
3508	2L660_1709933	3515	2L660_1709933	OVERHEAD	2L660	10	2883	2952	-
3533	2L738_1709778	3540	2L738_1709778	OVERHEAD	2L738	10	2165	2204	-
3540	80504_1766405	3547	80504_1766405	OVERHEAD	80504	10	2098	2135	-
3541	2L743_1709776	3548	2L743_1709776	OVERHEAD	2L743	10	2142	2180	-
3542	2L741_1764857	3549	2L741_1764857	OVERHEAD	2L741	10	2206	2247	-
3545	2L746_1709777	3552	2L746_1709777	OVERHEAD	2L746	10	2145	2183	-
3563	2L831_1709769	3570	2L831_1709769	OVERHEAD	2L831	10	1718	1742	-

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3567 2L834_1709765	3574 2L834_1709765	OVERHEAD	2L834	1Ø	1643	1665 -
3575 2L840_1709768	3582 2L840_1709768	OVERHEAD	2L840	1Ø	1743	1767 -
3579 9DA22_1768772	3586 9DA22_1768772	OVERHEAD	9DA22	1Ø	1730	1754 -
3583 9DA23_1768773	3590 9DA23_1768773	OVERHEAD	9DA23	1Ø	1722	1746 -
3586 2L843_103133389	3593 2L843_103133389	OVERHEAD	2L843	1Ø	1724	1748 -
3587 2L842_1709767	3594 2L842_1709767	OVERHEAD	2L842	1Ø	1751	1776 -
3588 2L835_1709766	3595 2L835_1709766	OVERHEAD	2L835	1Ø	1820	1847 -
3589 2L826_1764658	3596 2L826_1764658	OVERHEAD	2L826	1Ø	1862	1891 -
3597 9HL93_1769007	3604 9HL93_1769007	OVERHEAD	9HL93	1Ø	1758	1783 -
3598 9HL92_1771062	3605 9HL92_1771062	OVERHEAD	9HL92	1Ø	1775	1801 -
3599 94414_1768089	3606 94414_1768089	OVERHEAD	94414	1Ø	1801	1827 -
3600 94413_1769469	3607 94413_1769469	OVERHEAD	94413	1Ø	1821	1848 -
3601 94412_1768498	3608 94412_1768498	OVERHEAD	94412	1Ø	1845	1873 -
3605 7EQ13_1763937	3612 7EQ13_1763937	OVERHEAD	7EQ13	1Ø	1890	1920 New
3609 7F853_1763936	3616 7F853_1763936	OVERHEAD	7F853	1Ø	1858	1887 -
3613 7EQ15_1763935	3620 7EQ15_1763935	OVERHEAD	7EQ15	1Ø	1827	1854 -
3617 7EQ14_1763934	3624 7EQ14_1763934	OVERHEAD	7EQ14	1Ø	1803	1829 -
3618 7HA89_1782604	3625 7HA89_1782604	OVERHEAD	7HA89	1Ø	1932	1963 New
3619 7EQ45_1765216	3626 7EQ45_1765216	OVERHEAD	7EQ45	1Ø	1962	1993 New
3620 2L823_1764659	3627 2L823_1764659	OVERHEAD	2L823	1Ø	1995	2028 New
3621 7HA87_103109942	3628 7HA87_103109942	OVERHEAD	7HA87	1Ø	2050	2085 -
3622 2L764_1709770	3629 2L764_1709770	OVERHEAD	2L764	1Ø	2117	2154 -
3631 2L772_1709772	3638 2L772_1709772	OVERHEAD	2L772	1Ø	1888	1917 New
3643 2L813_1709878	3650 2L813_1709878	OVERHEAD	2L813	1Ø	1625	1647 -
3645 2L815_1709879	3652 2L815_1709879	OVERHEAD	2L815	1Ø	1628	1649 -
3649 2L819_1710047	3656 2L819_1710047	OVERHEAD	2L819	1Ø	1564	1584 -
3650 2L816_1709880	3657 2L816_1709880	OVERHEAD	2L816	1Ø	1618	1639 -
3651 2L809_1709877	3658 2L809_1709877	OVERHEAD	2L809	1Ø	1688	1711 -
3660 2L789_1709871	3667 2L789_1709871	OVERHEAD	2L789	1Ø	1557	1576 -
3669 2L802_1709873	3676 2L802_1709873	OVERHEAD	2L802	1Ø	1473	1491 -
3676 154Y57_103179534	3683 154Y57_103179534	OVERHEAD	154Y57	1Ø	1436	1452 -
3677 2L807_1709874	3684 2L807_1709874	OVERHEAD	2L807	1Ø	1450	1466 -
3679 2L808_1709875	3686 2L808_1709875	OVERHEAD	2L808	1Ø	1471	1488 -
3680 13K601_1781110	3687 13K601_1781110	OVERHEAD	13K601	1Ø	1583	1603 -
3684 2L794_1709872	3691 2L794_1709872	OVERHEAD	2L794	1Ø	1543	1562 -
3685 2L785_1709876	3692 2L785_1709876	OVERHEAD	2L785	1Ø	1627	1648 -
3687 2L777_1709886	3694 2L777_1709886	OVERHEAD	2L777	1Ø	1830	1857 -
3689 2L766_1709771	3696 2L766_1709771	OVERHEAD	2L766	1Ø	2033	2068 -
3692 2L748_1775531	3699 2L748_1775531	OVERHEAD	2L748	1Ø	2156	2195 -
3705 2L761_1709740	3712 2L761_1709740	OVERHEAD	2L761	1Ø	1887	1917 New
3706 2L759_1709739	3713 2L759_1709739	OVERHEAD	2L759	1Ø	1901	1930 New
3707 14DR68_103278465	3714 14DR68_103278465	OVERHEAD	14DR68	1Ø	1918	1948 New
3713 104E60_1775920	3720 104E60_1775920	OVERHEAD	104E60	1Ø	1844	1872 -
3714 104E59_1773898	3721 104E59_1773898	OVERHEAD	104E59	1Ø	1868	1897 -
3715 104E58_1709738	3722 104E58_1709738	OVERHEAD	104E58	1Ø	1900	1930 New
3716 2N380_1709741	3723 2N380_1709741	OVERHEAD	2N380	1Ø	1921	1951 New
3718 2L755_1709737	3725 2L755_1709737	OVERHEAD	2L755	1Ø	1939	1970 New
3719 2L753_1774779	3726 2L753_1774779	OVERHEAD	2L753	1Ø	1997	2030 New
3725 57267_1709779	3732 57267_1709779	OVERHEAD	57267	1Ø	2040	2074 -
3726 2L730_1709775	3733 2L730_1709775	OVERHEAD	2L730	1Ø	2290	2333 -
3727 2L728_1709774	3734 2L728_1709774	OVERHEAD	2L728	1Ø	2334	2380 -
3728 2L716_1709788	3735 2L716_1709788	OVERHEAD	2L716	2Ø	2543	2597 -
3729 2L714_1709787	3736 2L714_1709787	OVERHEAD	2L714	1Ø	2576	2631 -
3734 2L701_1709904	3741 2L701_1709904	OVERHEAD	2L701	1Ø	2500	2552 -
3744 8D346_115172693	3751 8D346_115172693	OVERHEAD	8D346	1Ø	2254	2296 -
3745 2L712_1709895	3752 2L712_1709895	OVERHEAD	2L712	1Ø	2284	2328 -
3746 2L709_1709910	3753 2L709_1709910	OVERHEAD	2L709	1Ø	2335	2381 -
3747 2L707_1709909	3754 2L707_1709909	OVERHEAD	2L707	1Ø	2365	2412 -
3748 2L706_1709908	3755 2L706_1709908	OVERHEAD	2L706	1Ø	2393	2441 -
3750 5ZW78_1709915	3757 5ZW78_1709915	OVERHEAD	5ZW78	1Ø	2395	2443 -
3751 2L705_1709907	3758 2L705_1709907	OVERHEAD	2L705	1Ø	2421	2470 -
3752 2L704_1709906	3759 2L704_1709906	OVERHEAD	2L704	1Ø	2475	2527 -
3753 2L703_1709905	3760 2L703_1709905	OVERHEAD	2L703	1Ø	2503	2556 -
3754 2L699_1761111	3761 2L699_1761111	OVERHEAD	2L699	1Ø	2574	2629 -
3755 2L696_1709786	3762 2L696_1709786	OVERHEAD	2L696	1Ø	2621	2679 -
3763 2L693_1709785	3770 2L693_1709785	OVERHEAD	2L693	1Ø	2484	2536 -
3764 2L690_1709784	3771 2L690_1709784	OVERHEAD	2L690	1Ø	2545	2600 -
3765 2L684_1709783	3772 2L684_1709783	OVERHEAD	2L684	1Ø	2583	2639 -
3766 2L681_1709782	3773 2L681_1709782	OVERHEAD	2L681	1Ø	2623	2681 -
3769 2L676_1709781	3776 2L676_1709781	OVERHEAD	2L676	1Ø	2647	2706 -
3770 2L672_1709780	3777 2L672_1709780	OVERHEAD	2L672	1Ø	2732	2794 -
3771 2L668_1709803	3778 2L668_1709803	OVERHEAD	2L668	1Ø	2794	2859 -
3776 2L667_1709802	3783 2L667_1709802	OVERHEAD	2L667	1Ø	2722	2785 -
3777 2L665_1709801	3784 2L665_1709801	OVERHEAD	2L665	2Ø	2790	2855 -

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3778 2L655__1709932	3785 2L655__1709932	OVERHEAD	2L655	1Ø	2970	3044 -
3779 2L654__1709931	3786 2L654__1709931	OVERHEAD	2L654	1Ø	3014	3090 -
3782 2L651__1709800	3789 2L651__1709800	OVERHEAD	2L651	1Ø	3055	3131 -
3783 2L647__1709799	3790 2L647__1709799	OVERHEAD	2L647	1Ø	3111	3189 -
3784 2L645__1709798	3791 2L645__1709798	OVERHEAD	2L645	1Ø	3143	3222 -
3785 2L644__1709797	3792 2L644__1709797	OVERHEAD	2L644	1Ø	3194	3274 -
3786 2L643__1709796	3793 2L643__1709796	OVERHEAD	2L643	1Ø	3246	3327 -
3787 2L639__1709805	3794 2L639__1709805	OVERHEAD	2L639	1Ø	3313	3395 -
3791 2L637__1709795	3798 2L637__1709795	OVERHEAD	2L637	1Ø	3187	3263 -
3792 2L635__1709794	3799 2L635__1709794	OVERHEAD	2L635	1Ø	3280	3360 -
3793 2L631__1709793	3800 2L631__1709793	OVERHEAD	2L631	1Ø	3411	3495 -
3794 2L630__1709807	3801 2L630__1709807	OVERHEAD	2L630	2Ø	3457	3543 -
3795 2L624__1709809	3802 2L624__1709809	OVERHEAD	2L624	1Ø	3566	3655 -
3800 2L628__1709792	3807 2L628__1709792	OVERHEAD	2L628	1Ø	3315	3392 -
3801 2L626__1709791	3808 2L626__1709791	OVERHEAD	2L626	1Ø	3480	3565 -
3804 13XK26__1781843	3811 13XK26__1781843	OVERHEAD	13XK26	3Ø	3548	3635 -
3805 2L621__1709808	3812 2L621__1709808	OVERHEAD	2L621	1Ø	3665	3755 -
3810 1CHY91__114697437	3817 1CHY91__114697437	OVERHEAD	1CHY91	3Ø	1060	1101 -
3811 7G915__1765710	3818 7G915__1765710	OVERHEAD	7G915	3Ø	2208	2249 -

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Docket No. E-2, Sub 1220

Exhibit CEB-9

SIS Estimation Tool Rev1.xlsm

#	Action	From DIS#	To DIS#	Distance (Miles)	Existing # of phases	Existing Conductor	New # of phases	New Conductor	Estimated Cost	Description
1	None					None		None	\$0.00	
2	None					None		None	\$0.00	
3	None					None		None	\$0.00	
4	None					None		None	\$0.00	
5	None					None		None	\$0.00	
6	None					None		None	\$0.00	
7	None					None		None	\$0.00	
8	None					None		None	\$0.00	
9	None					None		None	\$0.00	
10	None					None		None	\$0.00	
Total Cost Estimate:									\$0.00	

1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None
1	1	1	None	None	None

Library

Code	Actions	Conductor Types
1	None	None
2	Build New Line	1/0 ACSR
3	Reconductor	4/0 ACSR
4	Double Circuit	#2 ACSR
5	Triple Circuit	#2 BC
6	Add G&W at Takeoff	#4 BC
7	Verify for High Capacity	477 AAC
8		750 MCM Underground
9		
10		
11		

Neutral Conductor: 1/0 AAAC

Pricing

Action	Existing # of phases	Existing Conductor	New # of phases	New Conductor	\$/mile	Equipment	\$/unit
Build New Line	0	None	3	477 AAC	\$256,036.99		
Reconductor	1	1/0 ACSR	3	477 AAC	\$247,683.87	G&W Electronic Recloser	\$39,091.36
Reconductor	1	4/0 ACSR	3	477 AAC			
Reconductor	1	#2 ACSR	3	477 AAC	\$270,588.16		
Reconductor	1	#2 BC	3	477 AAC			
Reconductor	1	#4 BC	3	477 AAC	\$266,894.93		
Reconductor	1	477 AAC	3	477 AAC			
Reconductor	2	1/0 ACSR	3	477 AAC	\$246,100.45		
Reconductor	2	4/0 ACSR	3	477 AAC			
Reconductor	2	#2 ACSR	3	477 AAC	\$268,988.30		
Reconductor	2	#2 BC	3	477 AAC			
Reconductor	2	#4 BC	3	477 AAC	\$272,815.38		
Reconductor	2	477 AAC	3	477 AAC			
Reconductor	3	1/0 ACSR	3	477 AAC	\$250,342.87		
Reconductor	3	4/0 ACSR	3	477 AAC	\$250,432.94		
Reconductor	3	#2 ACSR	3	477 AAC	\$291,782.93		
Reconductor	3	#2 BC	3	477 AAC	\$291,782.93		
Reconductor	3	#4 BC	3	477 AAC	\$291,602.78		
Double Circuit	1	1/0 ACSR	3	477 AAC	\$439,389.13		
Double Circuit	1	4/0 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	1	#2 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	1	#2 BC	3	477 AAC	\$447,727.68		
Double Circuit	1	#4 BC	3	477 AAC	\$447,727.68		
Double Circuit	1	477 AAC	3	477 AAC	\$447,727.68		
Double Circuit	2	1/0 ACSR	3	477 AAC	\$439,389.13		
Double Circuit	2	4/0 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	2	#2 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	2	#2 BC	3	477 AAC	\$447,727.68		
Double Circuit	2	#4 BC	3	477 AAC	\$447,727.68		
Double Circuit	2	477 AAC	3	477 AAC	\$447,727.68		
Double Circuit	3	1/0 ACSR	3	477 AAC	\$439,389.13		
Double Circuit	3	4/0 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	3	#2 ACSR	3	477 AAC	\$447,727.68		
Double Circuit	3	#2 BC	3	477 AAC	\$447,727.68		
Double Circuit	3	#4 BC	3	477 AAC	\$447,727.68		
Double Circuit	3	477 AAC	3	477 AAC	\$447,727.68		
Triple Circuit	1	1/0 ACSR	3	477 AAC	\$570,000.00		
Triple Circuit	1	4/0 ACSR	3	477 AAC	\$570,000.00		
Triple Circuit	1	#2 ACSR	3	477 AAC	\$570,000.00		
Triple Circuit	1	#2 BC	3	477 AAC	\$570,000.00		
Triple Circuit	1	#4 BC	3	477 AAC	\$570,000.00		

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Triple Circuit	1	477 AAC	3	477 AAC	\$570,000.00
Triple Circuit	2	1/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	2	4/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	2	#2 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	2	#2 BC	3	477 AAC	\$570,000.00
Triple Circuit	2	#4 BC	3	477 AAC	\$570,000.00
Triple Circuit	2	477 AAC	3	477 AAC	\$570,000.00
Triple Circuit	3	1/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	3	4/0 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	3	#2 ACSR	3	477 AAC	\$570,000.00
Triple Circuit	3	#2 BC	3	477 AAC	\$570,000.00
Triple Circuit	3	#4 BC	3	477 AAC	\$570,000.00
Triple Circuit	3	477 AAC	3	477 AAC	\$570,000.00
Verify for High Capacity	3	477 AAC	0	None	\$50,000.00
Double Circuit	0	MCM Undergro	3	MCM Undergro	\$500,323.77
Build New Line	0	None	3	MCM Undergro	\$500,323.77

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Docket No. E-2, Sub 1220

Exhibit CEB-10

Revised Estimate (E-mail from
DEP to Williams Solar
dated July 30, 2019)

To: Flagstad, Frederik -greengoenergy[frederik@greengoenergy.com]
Cc: DERContracts[DERContracts@duke-energy.com]
From: Winter, Lee P
Sent: Tue 7/30/2019 1:05:11 PM (UTC-04:00)
Subject: Facility Study Report, Williams Solar, LLC CHKLIST

Dear Williams Solar,

The Interconnection Facilities and System Upgrades (the Facility Study) design and cost estimation for Williams Solar, LLC is complete. Per North Carolina Interconnection Procedures (NCIP) Section 5.1, at this time, you have the option to request a Construction Planning Meeting within 10 business days of receiving this Facility Study Report. If you wish to proceed with this meeting, please submit your request in writing.

The estimated installed cost of the *System Upgrades* is **\$1,388,374.26** (amount includes the North Carolina Sales Tax of 7%).

The estimated *Interconnection Facilities* costs for this project are **\$196,495.13**. This total is comprised of three costs subject to the North Carolina Sales Tax of 7%, and one cost that is not subject to this tax. The following three costs are subject to the North Carolina Sales Tax of 7%: an estimated construction cost of **\$116,419.10**, an estimated metering cost of **\$24,791.30**, and an overhead (processing, technology, oversight, and management) cost of **\$20,000.00**. With tax included, the total of these three costs amounts to **\$151,095.13**. The final cost accounted for in the total estimated Interconnection Facilities costs is an estimated commissioning cost of **\$24,000.00**. This cost is not subject to the North Carolina Sales Tax of 7%.

Upon receipt of an Interconnection Agreement (IA) for execution, you must elect to begin paying Interconnection Facilities costs by either a Contributory Plan or a Non-contributory Plan.

- If a Contributory Plan is elected, you will pay DEP a single up-front payment equal to **\$196,495.13**. You will also pay to Utility a Monthly Facilities Charge of **\$564.84** (0.4% of the estimated installed cost of **\$141,210.40** = estimated construction cost + estimated metering cost).
- If a Non-contributory Plan is elected, you must establish financial security arrangements for the initial term of this agreement. Additionally, you agree to maintain an irrevocable letter of credit in the amount of **\$151,095.13** for the full term of the initial contract period. You will pay overhead and commissioning costs upfront of **\$45,400.00**. You will also pay to Utility a Monthly Facilities Charge of **\$1,412.10** (1.0 % of the estimated installed cost of **\$141,210.40** = estimated construction cost + estimated metering cost).

All estimated costs are subject to being trued-up to actuals after construction, and the IA amended.

Next Steps:

1. Within 10 business days, please provide your requested in-service date for Duke facilities to be in place and operational. If this request date cannot be accommodated, we will advise you of the earliest possible date.
2. At the same time you send the requested in-service date, please provide a response indicating whether or not you would like to request a Construction Planning Meeting.
 - a. If you do not request a Construction Planning Meeting, we will tender an executable IA within 15 business days after receipt of your requested in-service date.
 - b. If you do request a Construction Planning Meeting, we will schedule the meeting as soon as a mutually agreeable date is determined. We will not be able to tender an IA until after the occurrence of the Construction Planning Meeting, at such time it would be delivered within 15 business days after the Construction Planning Meeting.

Lee Winter

Wholesale Renewable Manager
Distributed Energy Technology



919-546-2207
919-219-7445 (mobile)

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Docket No. E-2, Sub 1220

Exhibit CEB-11

E-mail correspondence “Re: Facility Study Report, Williams Solar, LLC CHKLIST,” between July 30, 2019, and August 16, 2019

From: Interconnection [interconnection@greengoenergy.com]
Sent: 8/16/2019 2:10:31 PM
To: Interconnection [interconnection@greengoenergy.com]
CC: Winter, Lee P [/o=DukeEnergy/ou=External (FYDIBOHF25SPDLT)/cn=Recipients/cn=db64aaeb15aa4963b4ea05a8f2778430]; DERContracts [/o=DukeEnergy/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=DERContractsbb5]; Flagstad, Frederik -greengoenergy [/o=DukeEnergy/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flagstad, Frederik -greengoenergy61e]
Subject: Re: Facility Study Report, Williams Solar, LLC CHKLIST

Hi Lee,

Can you please provide some availability for a construction planning meeting? We are eager to move forward.

-Chrissy

On Wed, Aug 14, 2019 at 2:36 PM Interconnection <interconnection@greengoenergy.com> wrote:
Hi Lee,

Re: Williams Solar, LLC - NC2016-02927

Just wanted to circle back on the construction planning meeting and see if we could move forward with scheduling that.

-Chrissy

On Wed, Jul 31, 2019 at 4:35 PM Winter, Lee P <Lee.Winter@duke-energy.com> wrote:

Fred,

Receipt confirmed. Please see responses below in **RED**. We will be in touch shortly to schedule the construction planning meeting.

Lee Winter

Wholesale Renewable Manager

Distributed Energy Technology



919-546-2207

919-219-7445 (mobile)

From: Interconnection [mailto:interconnection@greengoenergy.com]
Sent: Tuesday, July 30, 2019 2:52 PM
To: Winter, Lee P <Lee.Winter@duke-energy.com>; DERContracts <DERContracts@duke-energy.com>
Cc: Flagstad, Frederik -greengoenergy <frederik@greengoenergy.com>; Interconnection US <interconnection@greengoenergy.com>
Subject: Re: Facility Study Report, Williams Solar, LLC CHKLIST

***** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. *****

Hi Lee and DERContracts,

Re: Williams Solar, LLC - NC2016-02927

Foremost, thank you for sending through the email noting that the Facility Study process has been completed.

FS - We note that the costs indicated by your email are as follows:

- System Upgrades is \$1,388,374.26 (incl. tax)
- Interconnection Facilities costs for this project are \$196,495.13 (incl. applicable tax)
- **Total Costs:** \$1,584,869.39

SIS - This amount is substantially higher than that of the System Impact Study, which resulted in:

- System Upgrades is \$774,000.00 (+ tax)
- Interconnection Facilities costs for this project are \$60,000.00 (+ applicable tax)
- **Total Costs:** \$834,000.00

This is a **90% (\$750,869.34)** increase compared to the very detailed scope and calculation provided at the SIS stage.

Given the extreme departure from the System Impact Study on the part of the Facility Study, we request a detailed overview of the costs associated with this Interconnection Request.

Request 1:

Please provide an updated Table 4 (from SIS) cost estimate for the FS, by filling of the 'Costs FS' section highlighted in yellow below:

Table 4 - Cost Overview	Costs SIS	Costs FS
Transmission Upgrades	\$0	
Substation Upgrades	\$0	
New Line Construction/Reconductoring	\$705,000	\$1,181,873.33
Protection Upgrades/Sectionalization	\$69,000	\$115,672.71
Other	\$0	
Total Upfront Charges	\$774,000	\$1,297,546.04

Further, we ask that you provide a detailed cost break down of every item in the SOW so that we can understand what exactly is driving this substantial increase in costs. **We cannot provide this level of detail.**

We note that a 'rule of thumb' for many years has been \$150-250K per Mile of line upgrade. With the ~2.5 miles of upgrades, this cost should be around \$375K to \$625K. A cost of ~\$1.39m is a very substantial departure from this standard.

Request 2:

Please confirm that the scope provided in the SIS dated December 20th, 2018 has not changed. **Confirmed.**
The scope has not changed.

Request 3:

Please clarify the reasons for the increase in cost. **After several true-ups that we have conducted on similar projects, we have found the initial costs that were provided historically (both ballpark costs, and detailed estimates) to be significantly underestimated. Therefore we have applied a new formula to ensure that the upfront costs more closely align with the final true up numbers.**

Request 4:

We request that a Construction Planning Meeting be scheduled to review the results. We ask that you provide these requested details in writing prior to scheduling a Construction Planning Meeting for Williams Solar, LLC so that we can have a detailed discussion about costs. **We will work on scheduling a construction planning meeting within the time allotted.**

Request 5:

Please provide guidance on the earliest possible in-service date for the Duke Interconnection Facilities. **We cannot provide estimated in service dates until the IA is executed, upfront costs are paid, and the project is released to construction.**

I ask that you please confirm receipt of this email. Further, I ask that you provide the requested information within 5 Business Days or alternatively suspend the deadline provided in your email.

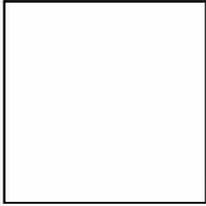
Thank you for your help in clarifying this FS Result.

Regards,

Fred Flagstad

Vice President, GreenGo Energy

Authorized Signatory for Williams Solar, LLC



Frederik Thoring Flagstad | Vice President

[GreenGo Energy US, Inc.](#) | 1447 S. Tryon St., Suite 201, Charlotte, NC 28203

Email: interconnection@greengoenergy.com | Mobile: +1 (704) 612 3010

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On Tue, Jul 30, 2019 at 1:05 PM Winter, Lee P <Lee.Winter@duke-energy.com> wrote:

Dear Williams Solar,

The Interconnection Facilities and System Upgrades (the Facility Study) design and cost estimation for Williams Solar, LLC is complete. Per North Carolina Interconnection Procedures (NCIP) Section 5.1, at this time, you have the option to request a Construction Planning Meeting within 10 business days of receiving this Facility Study Report. If you wish to proceed with this meeting, please submit your request in writing.

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 - a. If you do not request a Construction Planning Meeting, we will tender an executable IA within 15 business days after receipt of your requested in-service date.
 - b. If you do request a Construction Planning Meeting, we will schedule the meeting as soon as a mutually agreeable date is determined. We will not be able to tender an IA until after the occurrence of the Construction Planning Meeting, at such time it would be delivered within 15 business days after the Construction Planning Meeting.

Lee Winter

Wholesale Renewable Manager

Distributed Energy Technology



919-546-2207

919-219-7445 (mobile)

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Docket No. E-2, Sub 1220

Exhibit CEB-12

Overview of Revised Estimating Tool
– Williams Solar (Produced in
Response to Data Request No. 1-3)

Overview of Revised Estimating Tool – Williams Solar

In order to give developers a “best estimate cost, including overheads,” the Revised Estimating Tool (RET) was designed based on actual cost analysis of projects built and energized across 2018 and 2019.

RET updates the existing Duke Energy cost models in MAXIMO to more accurately reflect total project costs Duke Energy will likely incur from completion of Facility Study through completion of interconnection-related project construction. RET accounts for increased future costs by projecting inflation-impacted labor, material and equipment costs, modeling more likely resourcing and equipment requirements and adding a contingency factor for unforeseen events that have historically increased costs.

Why were changes needed to existing Duke Energy cost models?

- Interconnected projects are funded by developers and must comply with specific state or FERC regulations, including a requirement for best estimate costs
- Time from Facility Study completion to construction project energization can take several years. Historically, Duke Energy has incurred actual cost increases from the time of Facility Study completions due to multiple reasons, including but not limited to:
 - Inflation on materials, equipment, etc.
 - Contractual changes with internal and external resources
 - Changes to required internal/external resource/equipment usage due to volumes, etc.
 - Unforeseen project facility circumstances such as land constraints
 - Increased regulatory and safety requirements

Summary of RET changes to existing Duke Energy cost models

- Increased labor hours after including productivity constraints– MAXIMO model consistently underestimated labor hours for interconnection projects. MAXIMO has been recently updated to include some productivity constraints, so the RET model has been adjusted accordingly
- Increased contractor hourly rates – MAXIMO model used rate that consistently underestimated the levels of contractor resources and hourly rates used on interconnection projects
- Increased contractor fleet expenses previously underestimated in estimates
- Included inflation rate at 3% per year for labor and equipment x 2 years
- Included contingency of 20% to account for potential changes to operating and safety procedures, unforeseen construction issues caused by weather or ground conditions, etc.
- Increased overhead rates - MAXIMO model consistently underestimated overheads charged to interconnection projects

Detailed RET process

MAXIMO

Duke Energy uses a system called MAXIMO for work order origination and tracking as well as supply chain functions. Labor hour estimates and costs for types of work are pre-programmed in MAXIMO. MAXIMO estimates assume an 8-hour workday, 40 hours per work week for a 4-man crew.

Productivity Rate

To improve accuracy, estimated labor hours must incorporate contractually required reductions for travel, safety meetings, and set-up and take down during an average work day, among other things. The RET tool assumed a productivity rate of 75% for projects estimated prior to December 2019. MAXIMO was updated for productivity starting 12/1/2019, so the RET model has been adjusted to 90% DEP and 79% DEC for projects estimated from December 2019 to current to more closely match what we anticipate for actual charges.

Conversion from Estimated Hours to Estimated Weeks of Work

For a MAXIMO estimate of **4,580** labor hours, RET calculates **6,107** labor hours to complete the work.

- **4,580** MAXIMO hours divided by 75% Productivity Rate = **6,107 RET estimated labor hours**

If a project has 800 labor hours estimated, that project is estimated to take 5 weeks, since Duke Energy estimates a work week as 5, 8-hour days for a team of 4, 160 labor hours. This small partial week was not rounded up to the nearest total week for conservatism in the estimate.

- **6,107** estimated labor hours / (5 x 8 x 4) = **38.17 weeks**

Inflation Rate

The RET tool assumes 3% inflation per year with assumption that interconnection projects span 2 years from completion of Facility Study to completion of interconnection-related construction projects. RET adds 6% Inflation to the following Direct Costs:

- Labor Costs (LC)
- Material Costs (EMC)
- Vehicle Costs (VC)
- Flagging Costs (EFC)
- Additional Costs if applicable

Contingency

RET adds 20% Contingency for unforeseen risks to the following Direct Costs:

- Labor Costs (LC)
- Material Costs (EMC)
- Vehicle Costs (VC)
- Flagging Costs (EFC)
- Additional Costs if applicable

Overheads

RET adds 25% for Overhead Burdens to Direct Costs plus Contingency for LC, VC, EFC.

If there are Additional Costs such as Environmental, Tree Trimming, Right of Way, etc., those Additional Costs also include a 25% Overhead Burden.

For Materials, the Overhead Burden is 48.75%, which includes 33.75% for material allocations and 15% for stores loading.

Conversion to Estimated Cost per Man Week Using Revised Hours and Inflation Rate

RET uses a blended hourly contractor rate of \$75 per labor hour. Actual rates will vary dependent on the actual work and assigned crew resources and are charged based on contractual contractor rates negotiated in confidential Master Service Agreements with Duke Energy. Assigned crews can be a mixture of the following resources:

- General Foreman
- Working Foreman
- Class A Lineman
- Class B Lineman
- Class C Lineman
- Groundman
- Equipment Operator
- Truck Driver

Cost per Person per Man Week = $(\$75 \times 5 \times 8) \times 1.06$ inflation assumption for 2 years = \$3,180.00

Conversion to Estimated Total Labor Costs (LC) for Project

(Cost per Man Week) x (Number of Crews x Number of people per crew) x (Estimated Weeks of Work)

- | | |
|--|-------------|
| • \$3,180 X 1 crew x 4 people per crew times 38 weeks | = \$483,360 |
| • \$483,360 X 0.20 Contingency | = \$ 96,672 |
| • \$580,032 X 0.25 Overheads | = \$145,008 |
| • \$725,040 Total LC (with Inflation and Overheads) | |

Assumptions are adjusted in RET if the design requires more than the standard resources outlined above.

Vehicle Costs (VC)

Duke Energy subcontractors charge a separate hourly rate for vehicles and equipment required to perform the work. RET uses a blended rate of \$30 per hour since the actual rate will vary dependent on the work, assigned equipment, and contractually negotiated terms. Assigned equipment can be a mixture of the example following items:

- 50-60' Material Handler Bucket
- Up to 20,000 lbs. Digger Derrick
- Hourly - Pickup 3/4 Ton (4X4)
- Pickup 1/2 (4X4)
- Material Trailer
- Two Axle Pole Trailer
- Single Axle Pole Trailer
- Material Trailer
- Puller/Tensioner

(Cost per Man Week) x (Number of Crews x Number of people per crew) x (Estimated Weeks of Work)

- Cost per Man Week = (\$30 x 5 x 8) x 1.06 inflation assumption for 2 years = \$ 1,272
- \$ 1,272 X 1 crew x 4 people per crew times 38 weeks = \$193,344
- \$193,344 X 0.20 Contingency = \$ 36,689
- \$232,013 X 0.25 Overheads = \$ 58,003
- **\$290,016 Total VC (with Inflation and Overheads)**

Assumptions are adjusted in RET if the design requires more than the standard resources outlined above.

Estimated Material Costs (EMC)

Material costs are estimated in MAXIMO based on unit estimates. RET increases the MAXIMO estimated costs for inflation across 2 years:

- \$143,328 X 1.06 inflation assumption for 2 years = \$151,927
- \$151,927 X 0.4875 Material Overheads = \$ 74,065
- \$151,927 + \$74,065 = \$225,992
- \$225,992 X 0.20 Contingency = \$ 45,198
- \$45,198 X 0.25 Overheads = \$ 11,300
- \$225,992 + \$45,198 + \$11,300 = \$282,490
- **\$282,490 Total EMC (with Inflation and Overheads)**

Estimated Flagging Costs (EFC) – Flagging was minimal

Flagging costs are normally estimated assuming 2 flaggers for half of the estimated length of the project. Flaggers hourly blended rate is \$38.38.

Flagging for this project was minimal so it was included as part of Contingency as part of a good faith estimate.

$$\text{EFC Blended Rate:} = \frac{((\text{Rate}/\text{Hr} \times 40 \text{ hr} + \text{OT Rate}/\text{Hr} \times 5 \text{ OT hours}) \times (\text{Contractor Mark-Up}))}{45 \text{ labor Hours / Week}}$$

- \$38.38 X 5 X 8 X 0 weeks = \$0
- \$0 X 0.20 Contingency = \$0
- \$0 X 0.25 Overheads = \$0
- **\$0 Total EFC (with Inflation and Overheads)**

Additional Costs, such as Environmental, Tree Trimming and Right of Way Costs

There is a section in RET to remind planners to consider the need to add these costs if they are required for the specific project. If these costs are included, they also include 20% Contingency and 25% Overheads.

If estimated MAXIMO cost = \$20,000, RET would calculate Total as follows:

- \$0 X 0.20 Contingency = \$ 0
- \$0 X 0.25 Overheads = \$ 0
- **\$0 Total (with Inflation and Overheads)**

Summary Table Costs

Estimated Labor Costs Total (LC)	\$	725,040.00
Estimated Vehicle / Equipment Total (VC)	\$	290,016.00
Estimated Total Material Costs (EMC)	\$	282,490.03
Estimated Total Flagging Estimate (EFC)	\$	-
Estimated Total Adder Amount	\$	-
T&E Estimate	\$	1,297,546.03

Revised Estimating Tool Output

Interconnection Agreement Total	
Description	Worksheet Calculation
Engineering & Design	\$ 21,369.60
Labor & Equipment - Estimated	\$ 1,061,083.33
Materials - Estimated	\$ 331,666.17
Other - Estimated	\$ 4,451.82
Total Interconnection Agreement Estimate	\$ 1,418,570.93

Interconnection Facilities	
Description	Worksheet Calculation
Engineering & Design	\$ 1,068.48
Labor & Equipment - Estimated	\$ 55,028.85
Materials - Estimated	\$ 60,475.74
Other - Estimated	\$ 4,451.82
Total Interconnection Agreement Estimate	\$ 121,024.90

System Upgrades	
Description	Worksheet Calculation
Engineering & Design	\$ 20,301.12
Labor & Equipment - Estimated	\$ 1,006,054.48
Materials - Estimated	\$ 271,190.43
Other - Estimated	\$ -
Total Interconnection Agreement Estimate	\$ 1,297,546.03

System Upgrades			
Description	REM	MAXIMO	VARIANCE
Estimated Productive Manhours	4,580.43		
Estimated Hours to Complete Work	6,107.24	4,580.43	(1,526.81)
Cost per Man Week	3,180.00		
Estimated weeks of work (calculated)	38.00	29.00	(9.00)
Labor Costs	\$483,360.00	\$336,854.27	(146,505.73)
Vehicle costs	\$193,344.00		(193,344.00)
Hotel	\$-		-
Per Diem	\$-		-
Estimated T&E Labor Costs	\$676,704.00	\$336,854.27	\$(339,849.73)
Material Costs	\$151,927.41	\$143,327.75	\$(8,599.66)
Material O/H (Mat Alloc 33.75% + Stores Loading 15%)	\$74,064.61	\$24,365.72	\$(49,698.90)
Flagging Estimate	\$-	\$1,451.52	\$1,451.52
Tree Trim Estimate	\$-	\$-	\$-
Adder Amount for Additional Estimated Costs	\$-		\$-
Total Direct Costs	\$902,696.02	\$505,999.25	\$(396,696.77)
Contingency	\$180,539.20		\$(180,539.20)
Sub-Total before Burdens with Contingency	\$1,083,235.23	\$505,999.25	\$(577,235.98)
Overhead Burdens	\$214,310.80	\$173,420.06	\$(40,890.74)
T&E Estimate	\$1,297,546.03	\$679,419.31	\$(618,126.72)

Interconnection Facilities			
Description	REM	MAXIMO	VARIANCE
Estimated Productive Manhours	213.69		
Estimated Hours to Complete Work	284.92	213.69	(71.23)
Cost per Man Week	3,180.00		
Estimated weeks of work (calculated)	2.00		(2.00)
Labor Costs	\$25,440.00	\$15,712.13	(9,727.87)
Vehicle costs	\$10,176.00		(10,176.00)
Hotel	\$-		-
Per Diem	\$-		-
Estimated T&E Labor Costs	\$35,616.00	\$15,712.13	\$(19,903.87)
Material Costs	\$33,879.97	\$31,962.23	\$(1,917.73)
Material O/H (Mat Alloc 33.75% + Stores Loading 15%)	\$16,516.48	\$5,433.58	\$(11,082.90)
Flagging Estimate	\$3,070.22	\$-	\$(3,070.22)
Tree Trim Estimate	\$-	\$-	\$-
Adder Amount for Additional Estimated Costs	\$-		\$-
Total Direct Costs	\$89,082.68	\$53,107.94	\$(35,974.73)
Contingency	\$17,816.54		\$(17,816.54)
Sub-Total before Burdens with Contingency	\$106,899.21	\$53,107.94	\$(53,791.27)
Overhead Burdens	\$14,125.69	\$8,138.88	\$(5,986.81)
T&E Estimate	\$121,024.90	\$61,246.82	\$(59,778.08)

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-13

Copy of Time and Expense
Template.xlsx

Assumptions												
Enter Data in Yellow fields only:												
Work Order Numbers	Maximo Labor Hours Estimated	Labor Expense Estimated	Labor Overhead Estimated	Material Costs Estimated	Materials Overhead Estimated	Service Cost Estimated	Service Cost O/H Estimated	Veg Mgt Expenses Estimated	Flagging Expenses Estimated	Adder Amount for Additional Estimated Costs	Maximo Total Estimated Expenses	Flagging Yes / No
1	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	Yes
2	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
3	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
4	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
5	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
6	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
7	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
8	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
9	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
10	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
11	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
Total:	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$ -	\$ -	\$ -	

Notes:

Assumptions												
Enter Data in Yellow fields only:												
Work Order Numbers	Maximo Labor Hours Estimated	Labor Expense Estimated	Labor Overhead Estimated	Material Costs Estimated	Materials Overhead Estimated	Service Cost Estimated	Service Cost O/H Estimated	Veg Mgt Expenses Estimated	Flagging Expenses Estimated	Adder Amount for Additional Estimated Costs	Maximo Total Estimated Expenses	Flagging Yes / No
1	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	\$0.00	No
2	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
3	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
4	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
5	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
6	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
7	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
8	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
9	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
10	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
11	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
Total:	-	\$ -	\$ -	\$ -	\$ -			\$ -	\$ -	\$ -	\$ -	

Notes:

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-14

Cost Estimation Tool Presentation

Cost Estimation Tool Training

Cost Estimation Tool Training

Goal of Today

- Feel confident in the rationale and logic behind the tool
- Understand how to use the tool

AGENDA

- Reason for new Estimation Tool
- Assumptions in the Estimation Tool
- Review the Tool
- MAXIMO Work Order data
- Exercise to use the Estimation Tool

Context

- Convert Estimates from Unit Price to Time and Expense
- Adjust system estimate for unique circumstances
- Address project risks
- Identify clearly what is and is not included in estimate
- Improve cost estimation

Assumptions

- Hourly Rate \$75 / man hour Blended Rate
- Fleet Rate \$30 / man hour Blended Rate
- Flagging 2 man crew - half of total estimated time
- Contingency 20% of total costs
- Efficiency factor 75%
 - 6 out of 8 hour work day doing productive work

Detailed Cost Report-Summary

PUBLIC VERSION

Service Area: GOLDS

Work Order Number: 32657525

Version: 5-ACCEPTED DESIGN

Service Address: 468 Oberry Rd , DUDLEY , NC 28333

Work Order Owner: Coole, Robert

GL Account: CJ6D~E055~69100~NCSLRCA~MX2657525~I

Work Order Description: 19_ROBIN SOLAR LLC OFF SITE SYSTEM IMPROVEMENTS_DUDLEY 23KV_WIRE WORK 3 OF 3_RECOND 1.09 MI 2PH #1/0 ACSR / 1PH #4 CHD TO 3PH 477 AAC FROM 1BLQ95 TO DD02AZ INST TAP FUSE AT DD02AZ

Construction Details:

Task Type / CU Name	Field ID	CU Action	CU Quantity	Process	Project	Activity	Labor	Materials	Service Cost	Total	Labor Hours
OVERHEAD POLE AND EQUIP		I	435.00	NC SLRCA	MX2657525	I	\$20,402.52	\$9,121.93	\$0.00	\$29,524.45	277.02
OVERHEAD POLE AND EQUIP		R	235.00	NC SLRCA	MX2657525	I	\$6,311.22	\$0.00	\$0.00	\$6,311.22	85.69
OVERHEAD PRIMARY		I	47,054.24	NC SLRCA	MX2657525	I	\$74,595.78	\$24,632.99	\$0.00	\$99,228.77	112.84
OVERHEAD PRIMARY		R	29,847.02	NC SLRCA	MX2657525	I	\$17,475.38	\$0.00	\$0.00	\$17,475.38	37.28
UNIT INFRASTRUCTURE		R	315.00	NC SLRCA	MX2657525	I	\$0.00	\$0.00	\$0.00	\$0.00	0.00
UNIT INFRASTRUCTURE		I	355.00	NC SLRCA	MX2657525	I	\$420.00	\$373.67	\$0.00	\$793.67	6.00
DOLLARONLY		I	70,192.40	NC SLRCA	MX2657525	I	\$0.00	\$0.00	\$35,096.20	\$35,096.20	0.00
OVERHEAD SECONDARY		I	65.00	NC SLRCA	MX2657525	I	\$164.98	\$33.33	\$0.00	\$198.31	2.24
OVERHEAD SECONDARY		R	117.00	NC SLRCA	MX2657525	I	\$199.59	\$0.00	\$0.00	\$199.59	2.71
POLE PULL		R	1.00	NC SLRCA	MX2657525	I	\$58.80	\$0.00	\$0.00	\$58.80	0.84
POLE REINFORCEMENT		R	3.00	NC SLRCA	MX2657525	I	\$371.20	\$0.00	\$0.00	\$371.20	5.04
OVERHEAD SECONDARY		T	10.00	DPRJOMC	MX2657525	X	\$796.30	\$0.00	\$0.00	\$796.30	10.81
TREE TRIMMING DUKE		I	1.00	NC SLRCA	MX2657525	I	\$88.38	\$0.00	\$0.00	\$88.38	1.20
OVERHEAD PRIMARY		T	11.00	DPRJOMC	MX2657525	X	\$991.62	\$0.00	\$0.00	\$991.62	13.46
UNDERGROUND TERMINATIONS		I	14.00	NC SLRCA	MX2657525	I	\$613.20	\$267.60	\$0.00	\$880.80	8.76
UNDERGROUND TERMINATIONS		R	14.00	NC SLRCA	MX2657525	I	\$464.52	\$0.00	\$0.00	\$464.52	6.64
Grand Total:			148,669.66				\$122,953.49	\$34,429.52	35,096.20	\$192,479.21	1,670.53

Project Details:

Project	Process	Activity	CU	CU Name	Labor	Labor	Material	Material	Service Cost	Service Cost	Total	Labor
MX2657525	DPRJOMC	X	T		\$1,787.93	\$926.15	\$0.00	\$0.00	\$0.00	\$0.00	\$2,714.07	1.33%
	NC SLRCA	I	I		\$96,284.86	\$49,875.56	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83	\$239,718.99	71.36%
			R		\$24,880.70	\$12,888.20	\$0.00	\$0.00	\$0.00	\$0.00	\$37,768.90	18.44%
Total					\$122,953.49	\$63,689.91	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83	\$280,201.96	91.12%

Example – Robin Solar

- Updated with Maximo Work Orders

Assumptions												
Enter Data in Yellow fields only:												
Work Order Numbers	Maximo Labor Hours Estimated	Labor Expense Estimated	Labor Overhead Estimated	Material Costs Estimated	Materials Overhead Estimated	Service Cost Estimated	Service Cost O/H Estimated	Veg Mgt Expenses Estimated	Flagging Expenses Estimated	Environmental Expenses Estimated	Maximo Total Estimated Expenses	Flagging Yes / No
Work Order Number: 32657525	1,670.53	\$122,953.49	\$63,689.91	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83	\$53,276.03	\$53,276.03	\$-	\$333,478.00	Yes
2	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
3	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
4	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
5	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
6	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
7	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
8	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
9	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
10	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
11	-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$0.00	
Total:	1,670.53	\$ 122,953.49	\$ 63,689.91	\$ 34,429.52	\$ 5,853.02			\$ 53,276.03	\$ 53,276.03	\$ -	\$ 333,478.00	

Example – Robin Solar

Assumptions												
Enter Data in Yellow fields only:												
Work Order Numbers	Maximo Labor Hours Estimated	Labor Expense Estimated	Labor Overhead Estimated	Material Costs Estimated	Materials Overhead Estimated	Service Cost Estimated	Service Cost O/H Estimated	Veg Mgt Expenses Estimated	Flagging Expenses Estimated	Environmental Expenses Estimated	Maximo Total Estimated Expenses	Flagging Yes / No
Work Order Number: 32657525	1,670.53	\$122,953.49	\$63,689.91	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83		\$ 53,276.03	\$ -	\$280,201.96	Yes
2	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
3	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
4	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
5	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
6	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
7	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
8	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
9	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
10	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
11	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
Total:	1,670.53	\$ 122,953.49	\$ 63,689.91	\$ 34,429.52	\$ 5,853.02			\$ -	\$ 53,276.03	\$ -	\$ 280,201.96	

Detailed Cost Report-Summary

PUBLIC VERSION

Exhibit CEB-14

Docket No. E-2, Sub 1220

Page 10 of 13

Service Area: GOLDS

Work Order Number: 32657525

Version: 5-ACCEPTED DESIGN

Service Address: 468 Oberry Rd , DUDLEY , NC 28333

Work Order Owner: Coole, Robert

GL Account: CJ6D~E055~69100~NCSLRCA~MX2657525~I

Work Order Description: 19_ROBIN SOLAR LLC OFF-SITE SYSTEM IMPROVEMENTS_DUDLEY 23KV_WIRE WORK 3 OF 3_RECOND 1.09 MI 2PH #1/0 ACSR / 1PH

Construction Details:

Task Type / CU Name	Field ID	CU Action	CU Quantity	Process	Project	Activity	Labor	Materials	Service Cost	Total	Labor Hours
OVERHEAD POLE AND EQUIP		I	435.00	NCSLRCA	MX2657525	I	\$20,402.52	\$9,121.93	\$0.00	\$29,524.45	277.02
OVERHEAD POLE AND EQUIP		R	235.00	NCSLRCA	MX2657525	I	\$6,311.22	\$0.00	\$0.00	\$6,311.22	85.69
OVERHEAD PRIMARY		I	47,054.24	NCSLRCA	MX2657525	I	\$74,595.78	\$24,632.99	\$0.00	\$99,228.77	1,012.84
OVERHEAD PRIMARY		R	29,847.02	NCSLRCA	MX2657525	I	\$17,475.38	\$0.00	\$0.00	\$17,475.38	237.28
UNIT INFRASTRUCTURE		R	315.00	NCSLRCA	MX2657525	I	\$0.00	\$0.00	\$0.00	\$0.00	0.00
UNIT INFRASTRUCTURE		I	355.00	NCSLRCA	MX2657525	I	\$420.00	\$373.67	\$0.00	\$793.67	6.00
DOLLARONLY		I	70,192.40	NCSLRCA	MX2657525	I	\$0.00	\$0.00	\$35,096.20	\$35,096.20	0.00
OVERHEAD SECONDARY		I	65.00	NCSLRCA	MX2657525	I	\$164.98	\$33.33	\$0.00	\$198.31	2.24
OVERHEAD SECONDARY		R	117.00	NCSLRCA	MX2657525	I	\$199.59	\$0.00	\$0.00	\$199.59	2.71
POLE PULL		R	1.00	NCSLRCA	MX2657525	I	\$58.80	\$0.00	\$0.00	\$58.80	0.84
POLE REINFORCEMENT		R	3.00	NCSLRCA	MX2657525	I	\$371.20	\$0.00	\$0.00	\$371.20	5.04
OVERHEAD SECONDARY		T	10.00	DPRJOMC	MX2657525	X	\$796.30	\$0.00	\$0.00	\$796.30	10.81
TREE TRIMMING DUKE		I	1.00	NCSLRCA	MX2657525	I	\$88.38	\$0.00	\$0.00	\$88.38	1.20
OVERHEAD PRIMARY		T	11.00	DPRJOMC	MX2657525	X	\$991.62	\$0.00	\$0.00	\$991.62	13.46
UNDERGROUND TERMINATIONS		I	14.00	NCSLRCA	MX2657525	I	\$613.20	\$267.60	\$0.00	\$880.80	8.76
UNDERGROUND TERMINATIONS		R	14.00	NCSLRCA	MX2657525	I	\$464.52	\$0.00	\$0.00	\$464.52	6.64
Grand Total:			148,669.66				\$122,953.49	\$34,429.52	35,096.20	\$182,479.21	1,670.53

Project Details:

Project	Process	Activity	CU	CU Name	Labor	Labor	Material	Material	Service Cost	Service Cost	Total	Labor
MX2657525	DPRJOMC	X	T		\$1,787.93	\$926.15	\$0.00	\$0.00	\$0.00	\$0.00	\$2,714.07	1.33%
			I		\$96,284.86	\$49,875.56	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83	\$239,718.99	71.36%
			R		\$24,880.70	\$12,888.20	\$0.00	\$0.00	\$0.00	\$0.00	\$37,768.90	18.44%
Total				\$122,953.49	\$63,689.91	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83	\$280,201.96	91.12%	

Type Activity Cost

Example – Robin Solar

- Updated with Maximo Work Orders

Assumptions												
Enter fields in Yellow only												
Work Order Numbers	Maximo Labor Hours Estimated	Labor Expense Estimated	Labor Overhead Estimated	Material Costs Estimated	Materials Overhead Estimated	Service Cost Estimated	Service Cost O/H Estimated	Reg Mgt Expenses Estimated	Flagging Expenses Estimated	Environmental Expenses Estimated	Maximo Total Estimated Expenses	Flagging Yes / No
32657525	1,670.53	\$122,953.49	\$63,689.91	\$34,429.52	\$5,853.02	\$35,096.20	\$18,179.83		\$ 53,276.03	\$ -	\$280,201.96	Yes
32657744	75.40	\$5,545.94	\$2,872.80	\$7,689.27	\$1,307.18	\$0.00	\$0.00	\$ -	\$ -	\$ -	\$17,415.18	
32657881	12.23	\$900.89	\$466.66	\$4,139.68	\$703.75	\$0.00	\$0.00	\$ -	\$ -	\$ -	\$6,210.97	
32657409	112.89	\$8,052.11	\$4,170.99	\$19,191.13	\$3,262.49	\$0.00	\$0.00	\$ -	\$ -	\$ -	\$34,676.72	
32656970	1,346.91	\$99,171.13	\$51,370.65	\$30,250.32	\$5,142.55	\$1,813.05	\$939.16	\$ 2,752.21	\$ -	\$ -	\$188,686.87	
32640550	53.12	\$3,897.83	\$2,019.08	\$27,189.77	\$4,622.26	\$0.00	\$0.00	\$ -	\$ -	\$ -	\$37,728.94	
7	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
8	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
9	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
10	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
11	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$0.00	
Total:	3,271.08	\$ 240,521.39	\$ 124,590.08	\$ 122,889.69	\$ 20,891.25			\$ 2,752.21	\$ 53,276.03	\$ -	\$ 564,920.65	

Create Robin Solar Revised Estimate

- Practice Exercise
 - Time and Expense Estimate Template
 - Robin Solar Work Orders
 - Time and Expense Estimate Job Aid

Wrap-up

- Do you feel confident :
 - In the rationale and logic behind the tool
 - To use the tool efficiently
 - How you would use this tool, tailored to your individual needs
- Additional Questions
 - Beckton James beckton.james@duke-energy.com

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-15

July 30, 2019 e-mail re: “Cost
Estimation Training”

Subject: FW: Cost Estimation Training
Location: Skype Meeting

Start: Thu 8/1/2019 2:30 PM
End: Thu 8/1/2019 3:30 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Andreasen, Jack

Importance: High

-----Original Appointment-----

From: Andreasen, Jack
Sent: Tuesday, July 30, 2019 4:07 PM
To: Andreasen, Jack; Duke, Kelly B; Judd, Shane Alan; Agee, Matthew; Gill, Mark Anthony; Lewis, Lynn C; Miller, Robert Mull; Sizemore, Patrick W; James, Beckton; Shoaf, David; Mabry, Bob; Ray, Victor A; Vu, Van C; Blanchard, Kenny; Cass, Robert; Hooks, Jimmy Dale; Greene, Kenneth R; Walters, Michael L; McRee, Seth R; English, Dylan; Neil Bhagat (Neil.Bhagat@duke-energy.com)
Cc: Sloan, Megan; Emery, Duane D.; Ferrell, Steve B; Waggoner, Mike; Astralla, James John; Deese, Nick; Fields, Billy; Horton, Thomas
Subject: Cost Estimation Training
When: Thursday, August 1, 2019 2:30 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Skype Meeting
Importance: High

Hello all,

This is the first of two (potentially three, if schedules conflict) trainings regarding the cost estimation tool created by Beckton James. This tool will help identify and rectify the differences between Maximo outputs and the actuals we see come in. Tomorrow afternoon (Wednesday July 31st) I will be sending out the tool itself, the PowerPoint that will direct the training and a test case to check your understanding at the end of the training. The goal of this is to give you a chance to look the presentation and tool beforehand. If you want, give it a try on your own and come with questions. This will make the training run a bit smoother.

If you have any questions or comments about the training or the tool itself please feel free to reach out to myself or Beckton.

If you cannot make this training I will be selecting at least one, potential two dates for next week that will accommodate everyone.

Finally, if you see someone missing from this email please feel free to forward this request, and any requisite materials.

Best,
Jack Andreasen
Engineering Design Associate
Jack.Andreasen@duke-energy.com
Duke Energy 919-546-5305



→ [Join Skype Meeting](#)

Trouble Joining? [Try Skype Web App](#)

[Help](#)

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-16

August 1, 2019 e-mail re: “Cost Estimation Tool Presentation.pptx”

From: James, Beckton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4D3A20F64F64A0480E66F9BCFF404D5-C55923 (337)]
Sent: 8/1/2019 11:14:52 AM
To: Andreasen, Jack [Jack.Andreasen@duke-energy.com]; Bhagat, Neil [Neil.Bhagat@duke-energy.com]
Subject: Cost Estimation Tool Presentation.pptx
Attachments: Cost Estimation Tool Presentation.pptx

Neil and Jack,

Here is the presentation for today, please review and give me feedback.

Presentation is intended to be high level and the job aid to follow will be detailed.

Will be sharing my screen so I can also pull in any spreadsheets necessary during presentation and exercise.

Beckton

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-17

August 1, 2019 e-mail re:
“Conference Line for Cost Estimation
Training”

From: Andreasen, Jack
Sent: Thursday, August 1, 2019 11:53 AM
Subject: Conference line for Cost Estimation Training

The following conference line will be used for all 3 cost estimation trainings:

Conference line: 704-382-5555

Participant code: 337699#

The presentation will be sent out shortly along with the tool, and the practice case. Sorry for the delay.

Best,
Jack Andreasen MPA, MSES
Engineering Design Associate
Jack.Andreasen@duke-energy.com
Duke Energy 919-546-5305



PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-18

August 8, 2019 e-mail re: “Cost Estimation Tool Start Date and Consistency Issues”

From: Andreasen, Jack
Sent: Thursday, August 8, 2019 9:50 AM
Cc: Davis, Wesley; Massengill, Donna B
Subject: Cost Estimation Tool Start Date and Consistency Issues

All,

I understand there has been some confusion over when the new cost estimation tool should be used. This tool is to be used beginning **now**. The tool is operational and should be used on projects going forward from today.

Alongside this, each estimation made needs to have a person (another engineer, technologist, manager etc.) approve it. The place to note this approval can be seen in totals vs estimates tab at the top. To supplement this approval process, after the **first** attempt at using the tool, send the final estimate to either Beckton or myself to ensure the tool was used correctly. This should help with consistency issues and iron out any bugs that may arise in developing a new tool across the entire firm.

Please forward these instructions to whoever you see fit. I appreciate your help in this process and apologize for any confusion that may have resulted.

Best,
Jack Andreasen MPA, MSES
Engineering Design Associate
Jack.Andreasen@duke-energy.com
Duke Energy 919-546-5305



From: James, Beckton
Sent: Wednesday, August 7, 2019 3:10 PM
To: Andreasen, Jack <Jack.Andreasen@duke-energy.com>; Winter, Lee P <Lee.Winter@duke-energy.com>; Walters, Michael L <Michael.Walters2@duke-energy.com>; Duke, Kelly B <Kelly.Duke@duke-energy.com>; Fields, Billy <Billy.Fields@duke-energy.com>; Judd, Shane Alan <Shane.Judd@duke-energy.com>; Astralla, James John <James.Astralla@duke-energy.com>; Agee, Matthew <Matthew.Agee2@duke-energy.com>; Deese, Nick <Nick.Deese@duke-energy.com>; Gill, Mark Anthony <Mark.Gill@duke-energy.com>; Hardwick, Elizabeth E <Elizabeth.Hardwick@duke-energy.com>; Lewis, Lynn C <Lynn.Lewis@duke-energy.com>; Anderson, Zachary B <Zachary.Anderson@duke-energy.com>; Miller, Robert Mull <Robert.Miller@duke-energy.com>; Horton, Thomas <Thomas.Horton3@duke-energy.com>; Sizemore, Patrick W <Patrick.Sizemore@duke-energy.com>; Ray, Mallory C <Mallory.Ray@duke-energy.com>; Shoaf, David <David.Shoaf@duke-energy.com>; Ray, Victor A <Victor.Ray@duke-energy.com>; Vu, Van C <Van.Vu@duke-energy.com>; Blanchard, Kenny <Kenny.Blanchard@duke-energy.com>; Cass, Robert <Robert.Cass@duke-energy.com>; Hooks, Jimmy Dale <Jimmy.Hooks@duke-energy.com>; Greene, Kenneth R <Kenneth.Greene@duke-energy.com>; McRee, Seth R <Seth.McRee@duke-energy.com>; English, Dylan <Dylan.English@duke-energy.com>; Bhagat, Neil <Neil.Bhagat@duke-energy.com>; Mabry, Bob <Bob.Mabry@duke-energy.com>

PUBLIC VERSION

Cc: Davis, Wesley <Wesley.Davis@duke-energy.com>; Massengill, Donna B <Donna.Massengill@duke-energy.com>

Subject: RE: Cost Estimation Training Day 2

Attached is the example files for Robin Solar I will be using today.

You can practice entering the Detailed Cost Report Work Orders into the template as I walk through them or on your own.

If you have any questions, please let me know.

Thanks,
Beckton

-----Original Appointment-----

From: Andreasen, Jack

Sent: Wednesday, July 31, 2019 10:57 AM

To: Andreasen, Jack; Winter, Lee P; Walters, Michael L; Duke, Kelly B; Fields, Billy; Judd, Shane Alan; Astralla, James John; Agee, Matthew; Deese, Nick; Gill, Mark Anthony; Hardwick, Elizabeth E; Lewis, Lynn C; Anderson, Zachary B; Miller, Robert Mull; Horton, Thomas; Sizemore, Patrick W; Ray, Mallory C; James, Beckton; Shoaf, David; Ray, Victor A; Vu, Van C; Blanchard, Kenny; Cass, Robert; Hooks, Jimmy Dale; Greene, Kenneth R; McRee, Seth R; English, Dylan; Bhagat, Neil; Mabry, Bob

Cc: Davis, Wesley; Massengill, Donna B

Subject: Cost Estimation Training Day 2

When: Wednesday, August 7, 2019 4:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Skype Meeting

Hello all,

If you have already confirmed your attendance for the first training you can disregard this email.

This is the second of three trainings regarding the cost estimation tool created by Beckton James. This tool will help identify and rectify the differences between Maximo outputs and the actuals we see come in. Today (Wednesday July 31st) I will be sending out the tool itself, the PowerPoint that will direct the training and a test case to check your understanding at the end of the training. The goal of this is to give you a chance to look the presentation and tool beforehand. If you want, give it a try on your own and come with questions. This will make the training run a bit smoother.

If you have any questions or comments about the training or the tool itself please feel free to reach out to myself or Beckton.

If you cannot make this training there will be another on Thursday afternoon (8/8). If you cannot make any of these please reach out to Beckton or myself to set something up.

Finally, if you see someone missing from this email please feel free to forward this request, and any requisite materials.

→ [Join Skype Meeting](#)

Trouble Joining? [Try Skype Web App](#)

[Help](#)

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PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-19

June 10, 2019 DEP internal e-mail

FW: ██████████ - Message (HTML) (Read-Only)

File Message Acrobat Litera Tell me what you want to do...

Delete Reply Reply Forward All Move Mark Unread Categorize Follow Up Translate Zoom Show/Hide EM Toolbar Save Attachments Where Filed Properties

iManage E-Mail Management

Duke Energy Corp - STATE - SC Generator Interconnection (File Delete Private Save Attachments)

Mon 6/10/2019 11:30 AM

 Bhagat, Neil

FW: ██████████

To James, Beckton

From: Roberts, Edward
Sent: Monday, June 10, 2019 11:24 AM
To: McNeill, Jack <Jack.McNeill@duke-energy.com>; Bhagat, Neil <Neil.Bhagat@duke-energy.com>; Jones, Roy <Roy.Jones3@duke-energy.com>; Lambert, Douglas <Douglas.Lambert@duke-energy.com>; Dembnicki, Jack <Jack.Dembnicki@duke-energy.com>; Martin, Daniel Joseph <Daniel.Martin4@duke-energy.com>; McRee, Seth R <Seth.McRee@duke-energy.com>
Subject: RE: ██████████

I did some research on the estimate calculations in Maximo and compared to what is real world. Below is the hourly rate that Maximo uses, roughly based on 4 men and 2 trucks. The hours for each CU are roughly based on WMIS plus 20%. (WMIS being based on a 3 man crew) We currently have a base crew size of 5 men but due to the ramp up efforts in late 2017 and throughout 2018 our crews were generally 6 men including a FM (2 bucket trucks, 1 line truck and 1 PU). The contract allows the vendor to bill us for equipment and total manhours, including the GF. These 2 solar jobs had an average crew size of 6 men plus some time charged by a GF. This would explain the estimates from Maximo being nearly 50% below the actuals. The labor cost is the largest contributing factor in the overrun. This looks to be an opportunity within our Maximo program that needs to be addressed as soon as possible.

Edward Roberts
Manager Contractor Resources
Coastal Zone / Carolinas East
1451 Military Cutoff Road
Wilmington, NC 28403
Cell: 910-619-1340

From: Roberts, Edward
Sent: Monday, June 10, 2019 10:00 AM
To: McNeill, Jack <Jack.McNeill@duke-energy.com>; Bhagat, Neil <Neil.Bhagat@duke-energy.com>; Jones, Roy <Roy.Jones3@duke-energy.com>; Lambert, Douglas <Douglas.Lambert@duke-energy.com>; Dembnicki, Jack <Jack.Dembnicki@duke-energy.com>;

PUBLIC VERSION

Docket No. E-2, Sub 1220

Exhibit CEB-20

June 6, 2019 internal DEP e-mail
chain “RE: DEP and DEC Exposure”

To: Jennings, Kenneth J[Kenneth.Jennings@duke-energy.com]; Massengill, Donna B[Donna.Massengill@duke-energy.com]
From: James, Beckton
Sent: Thur 6/6/2019 8:06:49 AM (UTC-04:00)
Subject: RE: DEP and DEC exposure

Ken,

It includes all of the projects I know of that are currently connected or under construction.

We might be missing some older projects from 2015 and 2016.

Thanks,
 Beckton

From: Jennings, Kenneth J
Sent: Thursday, June 6, 2019 8:05 AM
To: James, Beckton <Beckton.James@duke-energy.com>; Massengill, Donna B <Donna.Massengill@duke-energy.com>
Subject: RE: DEP and DEC exposure

Thanks Beckton. So about \$30 million.

Would this include everything that is currently connected or under construction?

From: James, Beckton
Sent: Thursday, June 6, 2019 8:03 AM
To: Jennings, Kenneth J <Kenneth.Jennings@duke-energy.com>; Massengill, Donna B <Donna.Massengill@duke-energy.com>
Subject: DEP and DEC exposure

Ken,

I built out the DEC exposure for Jack McNeill as well.
 Below is what I sent to Jack and Neil Bhagat 2 weeks ago.

The DEC exposure was my first iteration and I had not broken out the potential exposure in the same format as I did for DEP.
 Will send a revised breakout to you later today so you have apples to apples and a clear high level summary.

DEC:

Current Exposure	\$	1,854,762.10
Potential Exposure	\$	7,168,127.95
Total Exposure:	\$	9,022,890.05

Dist. or Transm.	(All)
OPCO	DEC
Operational Status	(Multiple Items)

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Count
2016	\$1,651,332.30		\$5,828,569.67		

2017	\$1,063,399.58	\$1,583,412.22	\$816,875.80	\$1,687,572.59
2018	\$321,370.47	\$471,688.82	\$302,030.34	\$615,764.66
2019	\$448,664.08		\$1,747,430.26	
2020	\$1,220,095.38		\$3,411,174.73	
Grand Total	\$4,704,861.81	\$2,055,101.04	\$12,106,080.80	\$2,303,337.25

Dist. or Transm.	(All)
OPCO	DEC
Operational Status	(Multiple Items)

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Count
2017	\$1,063,399.58	\$1,583,412.22	\$816,875.80	\$1,687,572.59	
2018	\$321,370.47	\$471,688.82	\$302,030.34	\$615,764.66	
Grand Total	\$1,384,770.05	\$2,055,101.04	\$1,118,906.14	\$2,303,337.25	

Total:	\$ 2,503,676.19	\$ 4,358,438.29	\$ 1,854,...
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Dist. or Transm.	(All)
OPCO	DEC
Operational Status	(Multiple Items)

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Count
2016	\$1,651,332.30		\$5,828,569.67		
2019	\$448,664.08		\$1,747,430.26		
Grand Total	\$2,099,996.38		\$7,575,999.93		

Total:	\$ 9,675,996.31	74.08%	\$
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Current Exposure	\$
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Dist. or Transm.	(All)
OPCO	DEC
Operational Status	(Multiple Items)

Potential Exposure	\$
Total Exposure:	\$

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Count
2020	\$1,220,095.38		\$3,411,174.73		
Grand Total	\$1,220,095.38		\$3,411,174.73		

Total:	\$ 4,631,270.11
---------------	------------------------

Thanks,
 Beckton

From: Jennings, Kenneth J
Sent: Thursday, June 6, 2019 7:55 AM
To: James, Beckton <Beckton.James@duke-energy.com>; Massengill, Donna B <Donna.Massengill@duke-energy.com>
Subject: RE: DEP Exposure

This is perfect. Great Work!! Thank you so much.

Is it possible to get this for DEC? I think that Elissa is working on it, but it seems like it is more difficult or something. Here is the email that Megan sent me?

Ken

From: James, Beckton
Sent: Friday, May 31, 2019 1:36 PM
To: Massengill, Donna B <Donna.Massengill@duke-energy.com>
Subject: FW: DEP Exposure

Here is what I have supplied to Jack McNeill for the DEP exposure cost.

I have updated the file with the estimated costs for the projects currently under construction.

Thanks,
 Beckton

From: James, Beckton
Sent: Friday, May 31, 2019 1:17 PM
To: McNeill, Jack <Jack.McNeill@duke-energy.com>
Cc: Flowers Jr., George Ginn <George.Flowers2@duke-energy.com>
Subject: DEP Exposure

Jack,

Here is what I calculate on the DEP exposure.

I have included the estimated costs from the IA's for all of the projects currently under construction.

These are only the DEP Distribution projects, Transmission projects are not included.

Current Exposure		\$ 11,379,454.66	Projects have been trued up
Potential Exposure		\$ 3,950,087.08	Projects with PTO dates in 2
Projects under Constr.		\$ 6,020,659.12	Projects with Operational S
Total Exposure:		\$ 21,350,200.86	

Dist. or Transm.	Dist.	Current Exposure
OPCO	DEP	Trued Up Projects
Operational Status	(Multiple Items)	

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Co
2017	\$2,218,756.05	\$2,597,015.76	\$7,922,433.06	\$11,113,619.26	
2018	\$1,999,482.15	\$2,748,742.75	\$4,908,599.15	\$11,969,347.30	
Grand Total	\$4,218,238.20	\$5,345,758.51	\$12,831,032.21	\$23,082,966.56	

Total:	\$ 17,049,270.41	\$ 28,428,725.07	\$
		Overrun Percentage	
		Current Exposure	\$

Dist. or Transm.	Dist.	Potential Exposure
OPCO	DEP	Not - Trued Up Projects - Interconnected
Operational Status	(Multiple Items)	

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Co
2016	\$796,477.68	\$965,756.37	\$2,679,459.51	\$4,727,657.83	
2019	\$1,122,480.82	\$965,776.02	\$1,319,800.81	\$2,697,917.40	

Grand Total	\$1,918,958.50	\$1,931,532.39	\$3,999,260.32	\$7,425,575.23
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Total:	\$ 5,918,218.82	66.74%	\$
		Overrun Percentage	
		Potential Exposure	\$

Dist. or Transm.	(All)	Exposure to Current Construction
OPCO	DEP	Projects Under Construction
Operational Status	(Multiple Items)	

Row Labels	Sum of IC	Sum of IC Actual Costs	Sum of SI Estimated Costs	Sum of SI Actual Costs	Co
2019	\$70,767.81		\$185,633.26		
2020	\$2,187,413.59		\$6,576,639.16		
Grand Total	\$2,258,181.40		\$6,762,272.42		

Total:	\$ 9,020,453.82	66.74%	\$
		Overrun Percentage	
		Under Construction	\$

Regards,

Beckton James

DET – Senior Business & Technical Consultant
(980) 373-2896 – office
(919) 740-6597 – mobile
beckton.james@duke-energy.com



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Exhibit CEB-21

CONFIDENTIAL DR No. 1-17
Williams Solar

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