

BEFORE THE PUBLIC SERVICE  
COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of )  
Grain Belt Express Clean Line LLC for a )  
Certificate of Convenience and Necessity )  
Authorizing It to Construct, Own, Operate, )  
Control, Manage, and Maintain a High ) Case No. EA-2016-0358  
Voltage, Direct Current Transmission Line )  
and an Associated Converter Station )  
Providing an Interconnection on the )  
Maywood - Montgomery 345 kV transmission )  
Line. )

Show me Exhibit No. 40F  
Date 3-21-17 Reporter KB  
File No. EA 2016-0358

THOMAS F. SHIFLETT'S RESPONSES TO  
SHOW ME CONCERNED LANDOWNERS'  
FIRST SET OF DATA REQUESTS

- | <u>Item No.</u> | <u>Description</u>   |
|-----------------|--|
| TS.1            | Does Quanta/PAR have an executed EPC contract with Grain Belt Express for the services it anticipates providing for development and construction of the line? If not, what is the expected timing of the EPC agreement?  |
|                 | <b>RESPONSE: No. It is anticipated that we will begin work on an executed EPC contract with Grain Belt Express upon regulatory approval of the line.</b>   |
| TS.2            | Are you familiar with the American Association of Cost Estimators International (AACEI) Recommended Practice No. 56R-08, COST ESTIMATE CLASSIFICATION SYSTEM – AS APPLIED FOR THE BUILDING AND GENERAL CONSTRUCTION INDUSTRIES? If your answer is in the negative, please identify any cost estimate classification systems, methods or protocols you are familiar with. |
|                 | <b>RESPONSE: I am not familiar with the referenced estimating system. Among transmission line constructors, most firms develop their existing programs in-house, which is the case with PAR Electric.</b>  |
| TS.3            | Based on AACEI Recommended Practice No. 56R-08 referenced above, what is the cost estimate classification level of the current capital cost estimate for GBX, and what is the associated level of uncertainty in the cost estimate?  |
|                 | <b>RESPONSE: N/A. Please see my response to TS.1.</b>  |
| TS.4            | Please provide input assumptions, calculations, workpapers, and results of the GBX capital cost estimate developed by PAR as referenced on page 12, line 4 of Mr. David Berry's surrebuttal testimony.   |
|                 | <b>RESPONSE: For purposes of clarification, the cost estimate referenced on page 12, line 4 of</b>   |

**Mr. David Berry's surrebuttal testimony was developed by Clean Line, in consultation with PAR on relevant inputs. Please see EA-2016-0358.GBX response to Show ME-DB.5.Attachment 01.HC, provided with David Berry's data request responses. The inputs provided by PAR are noted as such.**

TS.5 Are you familiar with the Project Definition Rating Index (PDRI) methodology promulgated by the Project Management Institute (PMI) and the Construction Industry Institute (CII)? If your answer is in the negative, please identify any project risk assessment methods or protocols you are familiar with.

**RESPONSE: I am not. I am familiar with PAR's in-house proprietary estimating program.**

TS.6 Has a PDRI assessment been performed on the GBX project? If so, what was the PDRI assessment score? If not, why not?

**RESPONSE: No. PAR does not utilize PDRI.**

TS.7 Has a project management plan and schedule, consistent with Project Management Institute (PMI) standards, been developed for the GBX project? If not why not?

**RESPONSE: A limited schedule was developed for the Grain Belt Express Project based upon the design and line route information available at the time. Please see EA-2016-0358.GBX response to Show Me-TS.7.Attachment 01.HC, and EA-2016-0358.GBX response to Show Me-TS.7.Attachment 02.HC. Note that these schedule documents are now outdated due to delays in obtaining the necessary regulatory approvals to construct the Project.**

TS.8 Please provide a copy of the latest project management plan and schedule (inclusive of any identified task dependencies and resource loadings) for the GBX project.

**RESPONSE: Please see Schedule TFS-4 attached to my direct testimony, EA-2016-0358.GBX response to Show Me-TS.7.Attachment 01.HC, and EA-2016-0358.GBX response to Show Me-TS.7.Attachment 02.HC. For the latest project schedule, please see EA-2016-0358.GBX response to MLA-G.81.Attachment 01.HC, which was attached to Dr. Galli's data request responses.**