Exhibit _ (KRK-3A)

Originally Filed As Exhibit No. _ (KRK-2) to the Direct Testimony of Kevin R. Kochems on Behalf of South Carolina Electric & Gas Company in Docket No. 2017-370-E

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THE OFFICE OF REGULATORY STAFF

SETTLEMENT TESTIMONY& EXHIBIT

OF

M. ANTHONY JAMES, P.E.

JUNE 29, 2015

DOCKET NO 2015-103-E

Summary

Petition of South Carolina Electric & Gas Company for Updates and Revisions to the Capital Cost Schedule and Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina

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SETTLEMENT TESTIMONY & EXHIBIT

OF

M. ANTHONY JAMES, P.E.

FOR

THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF

DOCKET NO. 2015-103-E

IN RE: PETITION OF SOUTH CAROLINA ELECTRIC & GAS COMPANY FOR UPDATES AND REVISIONS TO THE CAPITAL COST SCHEDULE AND SCHEDULES RELATED TO THE CONSTRUCTION OF A NUCLEAR BASE LOAD GENERATION FACILITY AT JENKINSVILLE, SOUTH CAROLINA

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.

A. My name is Anthony James. My business address is 1401 Main Street, Suite 900, Columbia, South Carolina 29201. I am employed by the State of South Carolina as the Director of New Nuclear Development for the Office of Regulatory Staff ("ORS").

Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I hold a Bachelor's Degree in Engineering and a Master's Degree in Earth and Environmental Resources Management from the University of South Carolina. I am a Professional Engineer registered in the State of South Carolina. I have been employed as a Project Engineer at environmental engineering consulting firms and at the South Carolina Department of Health and Environmental Control ("DHEC"). I joined DHEC in 1991 and was promoted from Project Engineer to Program Manager in 1995. As

Program Manager in the Bureau of Water, I was responsible for coordinating DHEC's statewide wastewater compliance efforts. In 2004, I joined the ORS Electric Department as a Senior Electric Specialist and was later promoted to Associate Program Manager. As a member of the Electric Department my responsibilities focused on testifying on various filings by investor-owned utilities, serving as the lead contact for renewable energy activities and implementing management objectives. In 2012, I was promoted to Deputy Director of the Electric and Natural Gas Division. As Deputy Director, my responsibilities grew to include providing general oversight of all activities of the Electric Department as well as the Natural Gas Department and supporting senior management objectives. In 2014, I was promoted to Director of New Nuclear Development to provide oversight of the nuclear construction projects in South Carolina. Collectively, I have more than twenty-five years of experience as an environmental engineer in regulatory compliance.

Q. HAVE YOU TESTIFIED BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA ("COMMISSION")?

A. Yes. I have testified before the Commission in general base rate cases, a number of fuel clause proceedings, and a previous proceeding to update the schedule and budget for the construction of the new nuclear units in Jenkinsville, SC. I have also been an ORS witness in proceedings regarding renewable energy resources, specifically, net metering programs and smart grid standards. I have also provided updates to the Commission via allowable ex parte briefings.

Q. WHAT IS THE PURPOSE OF YOUR SETTLEMENT TESTIMONY IN THIS PROCEEDING?

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A. The purpose of my settlement testimony is to provide an overview of the South Carolina Electric & Gas Company's (the "Company" or "SCE&G") petition for updates and revisions to the capital cost schedule and schedules related to the construction of a nuclear base load generation facility at Jenkinsville, South Carolina ("Petition"). I summarize ORS's findings regarding SCE&G's Petition and the major components of the settlement agreement ("Settlement") which ORS supports. Lastly, I discuss ORS's regulatory oversight activities with regard to the construction of V.C. Summer Nuclear Station AP1000 Units 2 & 3 (the "Units").

Q. WHAT IS SCE&G REQUESTING IN ITS PETITION?

A. Under S.C. Code Ann. § 58-33-270(E)(1) of the Base Load Review Act ("BLRA"), SCE&G is requesting the Commission to modify the construction schedule to reflect new substantial completion dates ("SCDs") of June 19, 2019 and June 16, 2020 for Unit 2 and Unit 3, respectively. SCE&G is also requesting an increase to the capital cost estimates by approximately $698 million (2007 dollars). See Exhibit MAJ-1. The $698 million is composed of approximately $453 million in Engineering, Procurement and Construction Contract ("EPC Contract") Costs and $245 million in Owner's Costs. Of the $698 million request, $325 million (which is net of $86 million in liquidated damages) in EPC Contract Costs and $214 million in owner's costs are attributed to delay and disputed costs which are discussed further below.

Q. WHAT AUTHORITY GUIDES ORS'S REVIEW OF THE PETITION?

A. ORS is guided by the same statute that permits the BLRA modification request, S.C. Code Ann. § 58-33-270(E)(1). It states, "The commission shall grant the relief requested, if after a hearing, the commission finds as to the changes in the schedules,

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estimates, findings, or conditions, that the evidence of record justifies a finding that the changes are not the result of imprudence on the part of the utility...." Using this statute, ORS reviews the Company's request to determine if there has been any imprudence on the part of the utility.

Q. IN REVIEWING THE PETITION AND SUPPORTING DOCUMENTATION, DID ORS FIND THAT SCE&G ACTED IMPRUDENTLY?

A. No, ORS did not. ORS finds that the changes presented in the Petition are not the result of imprudence on the part of the Company; and therefore, in accordance with the BLRA, SCE&G should be granted the relief requested.

Q. PLEASE DESCRIBE ORS'S ACTIVITIES IN RESPONSE TO SCE&G'S PETITION.

A. ORS issued numerous requests for information and reviewed an enormous amount of data to evaluate the Company's Petition. ORS met frequently with representatives from SCE&G's construction, business and finance departments to discuss the details of the Petition and the supporting information. ORS also interviewed several Company technical experts to fully understand the particulars related to various components of the Petition.

Q. PLEASE DISCUSS SCE&G'S REQUEST TO MODIFY THE APPROVED CONSTRUCTION SCHEDULE.

A. In August 2014, SCE&G received a preliminary revised construction schedule from Westinghouse Electric Company and Chicago Bridge & Iron (the "Consortium") which shows the Unit 2 SCD to be delayed until late 2018 or the first half of 2019, and the Unit 3 SCD date to be delayed by approximately one year, thereafter.

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SCE&G's Petition includes a revised construction schedule ("Revised Schedule") which shows new SCDs of June 19, 2019 and June 16, 2020 for Unit 2 and Unit 3, respectively. SCE&G refers to this schedule in its Petition as the revised, fully-integrated schedule. SCE&G reported to ORS that the Consortium continues to experience delays in fabrication and delivery of submodules for the Units and that these delays are the primary reason for the Revised Schedule.

Q. HAS SCE&G AGREED TO MODIFY THE GUARANTEED SUBSTANTIAL COMPLETION DATES IN THE EPC CONTRACT?

A. No. SCE&G's rights to liquidated damages from the Consortium are based on the guaranteed SCDs contained in the EPC Contract. The EPC Contract states that guaranteed SCDs can only be revised via a change order. In Docket No. 2012-203-E, SCE&G presented an agreement signed by the Company and the Consortium which became the basis for Change Order #16. The Commission approved the agreement in Order No. 2012-884 resulting in a revised schedule that included new SCDs which would match the guaranteed SCDs in the EPC Contract.

In this case, SCE&G has not agreed to a change order or an agreement supporting revised guaranteed SCDs. Consequently, should the Commission decide to approve the Company's request, the EPC Contract will retain the guaranteed SCDs of March 15, 2017 and May 15, 2018 for Unit 2 and Unit 3, respectively, as approved in Order No. 2012-884. However, as set forth in the Revised Schedule, the project would proceed toward the new SCDs of June 19, 2019 and June 16, 2020 for Unit 2 and Unit 3, respectively. If these new SCDs are approved, the guaranteed SCDs in the EPC Contract would be

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different from SCDs in the Commission's order. The tables below show the history of the SCDs for the Units.

Substantial Completion Dates

Unit 2:

Order No. 2009-104(A)	Order No. 2012-884	Docket 2015-103-E
4/1/2016	**3/15/2017**	**6/19/2019**

Unit 3:

Order No. 2009-104(A)	Order No. 2012-884	Docket 2015-103-E
1/1/2019	**5/15/2018**	**6/16/2020**

Q. DOES THE DIFFERENCE IN GUARANTEED SCDs IN THE EPC CONTRACT AND THE SCDs PRESENTED FOR APPROVAL UNDER THE BLRA IN THIS PETITION CREATE A CONCERN FOR ORS?

A. No. Although the new SCDs will not have the dual-binding impact of the Commission order and the EPC Contract, the Commission orders, as always, will continue to govern ORS's determination of SCE&G's ability to adhere to the approved schedule.

Q. HOW DO THE NEW SCDs RELATE TO THE FEDERAL PRODUCTION TAX CREDITS?

A. SCE&G is eligible to receive approximately $2.2 billion ($1.1 billion per unit) in federal production tax credits if the Units are placed in service prior to January 1, 2021. The new SCDs meet that date. However, the 18-month boundary currently approved by the Commission in Order No. 2009-104(A) allows the SCD for Unit 3 to extend beyond January 1, 2021.

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Q. PLEASE DISCUSS SCE&G'S REQUEST TO MODIFY THE CAPITAL COST ESTIMATES.

A. The Company is requesting to increase the base project cost by approximately $698 million (2007 dollars). See Exhibit MAJ-1 for a breakdown of costs in 2007 dollars. The gross construction cost of the Units will increase by approximately $1.1 billion (future dollars).

Base Project Cost ($000)

(2007 Dollars)

Order No. 2012-884	Docket 2015-103-E	Change
$4,548,405	$5,246,638	$698,233

Gross Construction Cost ($000)

(Future Dollars)

Order No. 2012-884	Docket 2015-103-E	Change
$5,754,565	$6,826,914	$1,072,349

Q. PLEASE PROVIDE A BREAKDOWN OF THE INCREASE IN THE BASE PROJECT COST.

A. The increase of approximately $698 million can be represented by two major cost categories, EPC Contract Costs totaling $453 million and Owner's Costs totaling $245 million.

Q. PLEASE PROVIDE A BREAKDOWN OF THE EPC CONTRACT COSTS.

A. With reference to Exhibit MAJ-1, the EPC Contract Cost is approximately $453 million which consists of $411 million in delay and other estimated at completion ("EAC") costs (or $325 million which is net of $86 million in the projected recovery of liquidated damages from the Consortium); $72 million in design finalization costs; $56.5

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million in change order costs; and a reduction of $107,000 for switchyard re-allocation of costs.

Q. WHAT CHANGE ORDERS ARE IN THE PETITION?

A. The Petition includes the following 10 change orders totaling approximately $56.5 million:

Change Orders ($000)

1 Plant Layout Security	$	20,350
2 Cyber Security Upgrades		18,816
3 Schedule Mitigation for Shield Building Panels		12,100
4 Federal Health Care Act (CO #20)		2,182
5 Plant Reference Simulator & S/W (CO #19)		1,100
6 Ovation and Common Q I&C Training Sys.		880
7 Simulator Development System		605
8 ITAAC Maintenance (CO #21)		372
9 Warehouse Fire Security		121
10 Perch Guards (CO #18)		14
Total Costs Due to Change Orders	**$**	**56,540**

Q. DOES ORS HAVE A RECOMMENDATION REGARDING THE CHANGE ORDERS?

A. Yes, given that several change orders are being negotiated, ORS recommends the Company track and report final change order costs in its quarterly reports filed with the Commission.

Q. PLEASE DISCUSS THE OWNER'S COSTS.

A. With reference to Exhibit MAJ-1, the Owner's Costs increase of approximately $245 million includes $214 million in owner's costs associated with the delay and $31 million in owner's costs not associated with the delay.

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Q. PLEASE ELABORATE ON OWNER'S COSTS ASSOCIATED WITH THE DELAY.

A. Owner's costs associated with the delay is approximately $214 million which consists of $125 million in owner's labor cost revisions; $30 million in owner's risk insurance and workers compensation insurance; $6.5 million in additional information technology ("IT") costs; $6 million in facilities cost increases; and $46 million in other costs.

Q. PLEASE ELABORATE ON OWNER'S COSTS NOT ASSOCIATED WITH THE DELAY.

A. Owner's costs not associated with the delay is approximately $31 million which consists of $7.5 million for 64 additional employees; $7 million in Nuclear Regulatory Commission ("NRC") fees; $3.3 million in other IT costs; and $12.8 million in other costs.

Q. HOW MUCH OF THE PETITION'S TOTAL INCREASE IS RELATED TO DELAY AND OTHER DISPUTED COST?

A. Approximately $539 million (or 77%) of the $698 million increase is related to delay and other disputed costs which includes $411 million in delay and other EAC costs (or $325 million which is net of $86 million in projected recovery of liquidated damages from the Consortium), and $214 million in owner's costs associated with the delay.

Q. DOES ORS HAVE ANY FINDINGS OR RECOMMENDATIONS?

A. Yes. ORS evaluated the Petition with regard to its statutory responsibility to represent the public interest by balancing the (1) concerns of the using and consuming public; (2) economic development and job attraction and retention in South Carolina; and

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(3) preservation of the financial integrity of the state's public utilities. ORS also evaluated the Petition with regard to Section 58-33-270(E) of the BLRA which states:

> "The commission shall grant the relief requested if, after a hearing, the commission finds:
>
> > (1) as to the changes in the schedules, estimates, findings, or conditions, that the evidence of record justifies a finding that the changes are not the result of imprudence on the part of the utility..."

ORS met frequently with representatives from SCE&G's construction, business and finance departments to discuss the methodology used to produce the estimates in the Petition. While the Company's owner's costs estimates are well supported, the EAC cost estimates provided by the Consortium, and adjusted by the Company, do not reflect the same level of detail as compared to the owner's costs estimates. Nevertheless, based on ORS's review; SCE&G's in-depth evaluation; and, SCE&G's adoption of the proposed schedule and budget, ORS finds the cost estimates to have sufficient support and provide a reasonable basis to proceed with the Units.

As ORS considers its statutory responsibility to represent the public interest in the context of the requirements of Section 58-33-270(E)(1) of the BLRA, ORS finds that the changes presented in the Petition are not the result of imprudence on the part of the Company; and therefore, in accordance with the BLRA, SCE&G should be granted the relief requested.

Q. WHO ARE THE PARTIES TO THE SETTLEMENT?

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A. ORS, SCE&G, and the South Carolina Energy Users Committee (collectively, the "Settling Parties" or the "Parties") filed the Settlement with the Commission on June 29, 2015. There are two other intervening parties in this docket: CMC Steel South Carolina and the Sierra Club.

Q. WHAT ARE THE MAJOR COMPONENTS OF THE SETTLEMENT?

A. The Parties agree that the Revised Schedule and capital cost estimates presented in the Petition are consistent with the BLRA and should be approved by the Commission.

The Parties also agree that beginning with any revised rates filing made on or after January 1, 2016, and prospectively thereafter until such time as the Units are completed, SCE&G will develop and calculate its revised rates filings using 10.5% as the return on common equity rather than the approved return on common equity of 11%.

Q. DOES ORS SUPPORT THE SETTLEMENT?

A. Yes. ORS supports this Settlement and finds it to be in the public interest. With the reduction of the return on equity from 11% to 10.5%, the total impact is estimated to be approximately $15 million in savings to ratepayers. ORS respectfully requests that the Commission approve the Settlement.

Q. WHAT ESTABLISHES ORS'S OVERSIGHT RESPONSIBILITIES?

A. Section 58-33-277(B) of the BLRA states that "[t]he Office of Regulatory Staff shall conduct on-going monitoring of the construction of the plant and expenditure of capital through review and audit of the quarterly reports under this article, and shall have the right to inspect the books and records regarding the plant and the physical progress of construction upon reasonable notice to the utility."

Q. WHAT ARE THE PRIMARY AREAS OF ORS'S OVERSIGHT ACTIVITIES?

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A. ORS monitors the Commission-approved construction schedule and cost estimates. Section 58-33-275(A) of the BLRA states, "...capital costs are prudent utility costs and expenses and are properly included in rates so long as the plant is constructed or is being constructed within the parameters of: (1) the approved construction schedule including contingencies; and (2) the approved capital costs estimates including specified contingencies."

Q. DESCRIBE ORS'S MONITORING OF THE APPROVED SCHEDULE.

A. ORS visits the construction site in Jenkinsville at least twice per week to perform on-site reviews of numerous documents that relate to the approved construction schedule. These documents include, but are not limited to: the weekly construction activities report, detailed construction schedules, milestone comparison activity report, milestone schedule recovery plans, major component fabrication status log and meeting minutes. ORS also attends on-site Plan of the Day meetings with "front-line" Project Managers to learn about immediate construction activities and challenges. On a monthly basis, ORS and its consultant meet with SCE&G's on-site lead project representatives to discuss the overall status of the Units and perform an in-depth site tour to observe construction progress.

Q. WHAT OTHER ACTIVITIES DOES ORS PERFORM AS PART OF ITS ON-GOING CONSTRUCTION SCHEDULE MONITORING?

A. In addition, ORS reviews the Company's required quarterly reports, which, among other things, provide a status of the approved BLRA milestone schedule. The BLRA milestone schedule consists of 146 milestone activities. ORS verifies the status of each milestone activity to ensure the construction activity is in accordance with the

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Commission's order. Milestone activities are allowed to be accelerated by up to 24 months or delayed by up to 18 months.

Q. PLEASE DESCRIBE ORS'S MONITORING OF THE APPROVED CAPITAL COST ESTIMATES.

A. ORS compares the capital cost estimates approved by the Commission to the cost estimates in the Company's quarterly reports. This comparison focuses on the 9 major cost categories, which are:

1. Fixed with No Adjustment
2. Firm with Fixed Adjustment A
3. Firm with Fixed Adjustment B
4. Firm with Indexed Adjustment
5. Actual Craft Wages
6. Non-Labor Cost
7. Time & Materials
8. Owner's Costs
9. Transmission Projects

ORS evaluates cost variances which may be due to various project changes (e.g., shifts in work scopes, payment timetables, construction schedule adjustments, change orders, etc.) to determine if the cumulative amount of these changes impact the total approved capital cost of the project (in 2007 dollars).

In a similar fashion, ORS compares the approved project cash flow to the project cash flow in the Company's quarterly reports. This comparison focuses on any impact to annual cash flow requirements.

Lastly, allowance for funds used during construction and escalation rates are evaluated to determine if appropriate rates have been applied.

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Q. WHAT OTHER ACTIVITIES DOES ORS PERFORM AS PART OF ITS ON-GOING MONITORING OF THE APPROVED CAPITAL COST ESTIMATES?

A. During on-site visits, ORS reviews documents that may impact the project budget. Examples of such documents are contract amendments and change orders. ORS also reviews invoices associated with completed milestone activities to ensure milestone payments are consistent with the EPC Contract milestone payment schedules. In addition, ORS's Audit Division further evaluates the Company's actual project expenditures.

Q. PLEASE ELABORATE ON ORS'S AUDIT DIVISION'S EVALUATIONS.

A. ORS Audit Division personnel conduct regulatory audit procedures on the Company's recorded project expenditures. ORS evaluates the Company's accounting controls over project expenditures and, based on this evaluation, ORS determines the extent to which these controls prevent improper payments.

Q. DOES ORS EXAMINE EACH DISBURSEMENT TO ENSURE THAT THE CONTROLS OVER DISBURSEMENTS ARE BEING PROPERLY APPLIED?

A. No. In accordance with standard audit procedures, ORS examines a sample of expenditures to ensure that the controls are being applied. These samples are selected from the entire population of charges to the construction project account.

Q. PLEASE DESCRIBE THE PROCEDURES PERFORMED TO ENSURE THAT DISBURSEMENTS COMPLY WITH THE INTERNAL CONTROLS.

A. For each disbursement selected, Audit staff examines vendor invoices to ensure: invoices are from valid vendors; charges included are related to the project; the charges are for the correct time period; invoices are mathematically correct; proper approval

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signatures are evident on the invoice routing documents; accounts charged are consistent with the nature of the disbursements; and items have been charged to the proper EPC Contract cost category.

Q. WHAT OTHER MONITORING ACTIVITIES DOES ORS PERFORM?

A. ORS technical staff, as well as, senior and executive management, participate in quarterly meetings with SCE&G's executive management. ORS meets quarterly with the Consortium representatives, attends NRC public meetings held near the site, and participates in NRC conference calls to monitor federal licensing activities. Additionally, ORS traveled to fabrication facilities in South Carolina, Virginia, Louisiana, and Florida to monitor the fabrication of major structural modules, shield building panels, mechanical modules and components.

Q. ARE THE RESULTS OF ORS'S OVERSIGHT ACTIVITIES AVAILABLE TO THE PUBLIC?

A. Yes. Subsequent to each quarterly report filed by SCE&G, ORS generates a report which details ORS's review of the Company's quarterly report as well as other notable activities related to the construction of the Units. ORS reports are non-confidential and available at www.regulatorystaff.sc.gov. In addition to ORS's review of SCE&G's quarterly reports, ORS responds to the Company's annual request for revised rates. ORS examines SCE&G's annual revised rates filing which seeks rate recovery to cover the financing of project expenditures. ORS reviews the request and issues a report documenting its findings.

Q. DOES THIS CONCLUDE YOUR SETTLEMENT TESTIMONY?

A. Yes, it does.

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SC Office of Regulatory Staff

SCE&G Petition to Modify the Approved Schedule and Budget for VC Summer Units 2&3
Docket No. 2015-103-E

Revision to Capital Cost Estimates ($000)

(2007 Dollars)

a. EPC Contract Costs		
i. Delay and Other EAC Costs		
Delay Costs and Other EAC Costs	$	410,328
Less "Liquidated Damages"		(85,525)
Net Delay and Other EAC Costs [a]	**$**	**324,803**
ii. Design Finalization Costs		
Costs Assoc. w/Final Design Finalization	$	71,899
Total Design Finalization Costs	**$**	**71,899**
iii. Costs Due to Change Orders:		
1 Plant Layout Security	$	20,350
2 Cyber Security Upgrades		18,816
3 Schedule Mitigation for Shield Building Panels		12,100
4 Federal Health Care Act (CO #20)		2,182
5 Plant Reference Simulator & S/W (CO #19)		1,100
6 Ovation and Common QI&C Training Sys.		880
7 Simulator Development System		605
8 ITAAC Maintenance (CO #21)		372
9 Warehouse Fire Security		121
10 Perch Guards (CO #18)		14
Total Costs Due to Change Orders	**$**	**56,540**
iv. Switchyard Cost Re-allocation	**$**	**(107)**
Total EPC Contract Costs	**$**	**453,136**
b. Owner's Cost Revisions Associated w/Delay		
i. Owner's Labor Cost Revisions	$	125,279
ii. Owner's Risk Insurance & Workers Comp.		30,101
iii. Additional IT Costs		6,504
iv. Facilities Cost Increases		6,071
v. Other Owner's Costs		46,351
Total Owner's Cost Assoc. w/Delay [b]	**$**	**214,307**
c. Owner's Cost Increases Not Assoc. w/Delay		
i. Additional 64 Employees	$	7,535
ii. NRC Fees		7,094
iii. Other IT Costs		3,309
iv. Other Costs		12,851
Total Owner's Cost Increases Not Assoc. w/Delay	**$**	**30,789**
Total Owner's Cost Increase	**$**	**245,096**
Total Delay and Disputed Costs [a][b]	**$**	**539,110**
Total Revision to Cost Forecast	**$**	**698,233**

Note: *Totals may not add due to rounding*

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