#### CIMFP Exhibit P-03171

From:	Justin Dahl
To:	pharrington@lowerchurchillproject.ca
Subject:	Requested analysis
Date:	Friday, December 1, 2017 4:13:40 PM
Attachments:	png Nalcor - Analysis of SNC-Lavalin"s Risk Assessment VC_F 120117.pdf

Paul,

I hope you are well. Please find our analysis of the SNC-Lavalin Risk Assessment attached. Please let us know if you have any questions or need any clarifications.

Thanks,

Justin

Justin Dahl

Principal

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# An Analysis of SNC-Lavalin's Risk Assessment Report

Discussion document December 2017

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- In June of 2017, a Risk Assessment report for the Lower Churchill Project (LCP) was released to the public that was developed by SNC-Lavalin in 2013
- The Risk Assessment made several assertions about Nalcor Energy - LCMC's risk management practices
- LCMC requested that Westney complete a review of the Risk Assessment to analyze the validity of those assertions



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## Important items to note



- The SNC-Lavalin Risk Assessment for the LCP developed in 2013 was never submitted to Nalcor
- No copy exists in LCMC's comprehensive document control system
- The review was not requested by LCMC management
- The document is identified as "Confidential for SNC-Lavalin Internal Use Only" and was not approved (signed) by Executive VP Scott Thon, who was a sitting member of the Steering Committee for SNC-Lavalin's EPCM services agreement



# Assertions made in the 2013 SNC-Lavalin Risk Assessment are not

## supported by the facts available CIMFP Exhibit P-03171

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Assertions about LCMC's risk management approach	Facts available	Supporting slides
A quantitative evaluation of risk exposure was not completed	<ul> <li>Westney with LCMC and SNC-Lavalin completed a quantitative risk analysis in 2012 prior to sanction</li> </ul>	4
2 The existing LCP risk register did not provide a realistic portrait of	<ul> <li>All risks identified by SNC-Lavalin were included in the LCP risk register and considered in Westney's analysis</li> </ul>	5 - 6
actual project risk	<ul> <li>SNC-Lavalin had several participants in Westney's risk identification and ranging sessions (which leveraged the existing LCP risk register)</li> </ul>	
A clear picture of the total cost- risk exposure was not provided	<ul> <li>The range of outcomes from Westney's analysis were inclusive of the results in SNC-Lavalin's Risk Assessment</li> </ul>	7
	<ul> <li>SNC-Lavalin provided critical cost estimate data (e.g., concrete installation production rates, costs per cubic meter) and was a key contributor in risk sizing/ranging</li> </ul>	
	<ul> <li>SNC Lavalin's Risk Assessment was completed in 2013 (a full year after Westney's analysis), and benefited from substantive knowledge gained from contractor bids on material packages</li> </ul>	
4 The risk management function was not empowered	<ul> <li>SNC-Lavalin was compensated for a full-time risk manager and a LCMC senior manager was engaged in the day-to-day risk activities</li> </ul>	
5 Mitigation plans were needed for the top 9 risks identified	<ul> <li>Top risks had been identified prior to sanction, with mitigations planned or already underway in 2013</li> </ul>	8
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### Timeline of key events



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# All risks included in the SNC-Lavalin Risk Assessment had already been identified by Nalcor-LCMC (1/2)

Risk title	Included <sup>1</sup>	Nalcor-LCMC reference <sup>2</sup>
High market cost from contractors to be expected	$\checkmark$	• KR 5 / KR 20
Concrete works slippage from baseline schedule	$\checkmark$	• KR 20
River closure slippage from baseline schedule	$\checkmark$	• KR 20
Limited availability of skilled and experienced manpower	$\checkmark$	• KR 24
Major components outsourcing in China	$\checkmark$	• KR 26
<ul> <li>Limited availability of skilled site management personnel</li> </ul>	$\checkmark$	• KR 22
<ul> <li>Difficulty transitioning to an integrated team project delivery model</li> </ul>	$\checkmark$	• KR 43
<ul> <li>Mobilization of community against the project</li> </ul>	$\checkmark$	• KR 18 / KR 19
<ul> <li>Additional delays resulting from difficult early works</li> </ul>	$\checkmark$	<ul> <li>**Time-risk analysis variable</li> </ul>
Large EPC packages	$\checkmark$	• KR 29
<ul> <li>Insufficient geotechnical information for north spur area</li> </ul>	$\checkmark$	• KR 23
Large packages issued for transmission lines	$\checkmark$	• KR 28
No geotechnical data available	$\checkmark$	• KR 23
Lack of control on delivering of Strait of Belle Isle (SOBI) crossing cable	$\checkmark$	• KR 11
<ul> <li>Commissioning failures of T&amp;G units</li> </ul>	$\checkmark$	• KR 13
<ul> <li>Insufficient geotechnical information</li> </ul>	$\checkmark$	• KR 23
Limited camp accommodation capacity at Muskrat Falls site	$\checkmark$	• R 185/ KR 24
<ul> <li>No geotechnical information for dam</li> </ul>	$\checkmark$	• KR 23
<ul> <li>C3 coordination of packages will be a challenge</li> </ul>	$\checkmark$	• R 162
<ul> <li>Insufficient suppliers' QA/QC</li> </ul>	$\checkmark$	<ul> <li>R 61 / R 159</li> </ul>

<sup>1</sup> Included in Nalcor's Decision Gate 3 Project Cost and Schedule Risk Analysis Report and incorporated into Westney's analysis <sup>2</sup> KR = Key risk, R = Risk <sup>3</sup> SNC-Lavalin risk level based on "probable consequence" (further details on slide 7)



Very high<sup>3</sup>

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# All risks included in the SNC-Lavalin Risk Assessment had already been identified by Nalcor-LCMC (2/2)

	Risk title	Included <sup>1</sup>	Nalcor-LCMC reference <sup>2</sup>
Very high <sup>3</sup>	<ul> <li>Contractors' (or sub-contractors') errors / omissions</li> </ul>	$\checkmark$	• R 59
	<ul> <li>Native issues for powerlines in Labrador</li> </ul>	$\checkmark$	• KR 18
	<ul> <li>Possibility of strike</li> </ul>	$\checkmark$	• KR 24
	<ul> <li>Underestimating workforce required to accomplish project</li> </ul>	$\checkmark$	• KR 24
	<ul> <li>Claims arising from contractors or suppliers</li> </ul>	$\checkmark$	• R 24
High <sup>3</sup>	<ul> <li>Requirements surrounding environmental assessment release</li> </ul>	$\checkmark$	• KR 15
	<ul> <li>Complexity of commissioning and system integration</li> </ul>	$\checkmark$	• KR 13
	<ul> <li>Riverside cofferdam catastrophic flooding</li> </ul>	$\checkmark$	• R 12
	<ul> <li>Scope of packages not aligned with suppliers' core businesses</li> </ul>	$\checkmark$	• R 147
	<ul> <li>Readiness for start-up might be a challenge</li> </ul>	$\checkmark$	• KR 13
	<ul> <li>Problematic long lead items</li> </ul>	$\checkmark$	• R 51 / R 130
	<ul> <li>Possible dispute for acquiring ROW for approx. 100km of powerlines</li> </ul>	$\checkmark$	• R 84
Medium <sup>3</sup>	<ul> <li>Powerlines corridor located in remote areas</li> </ul>	$\checkmark$	• R 122 / R 94
	<ul> <li>Delay in availability of admin. building creating inefficient site mgmt.</li> </ul>	$\checkmark$	<ul> <li>Not considered a risk (minor issue)</li> </ul>
	<ul> <li>Suitability of site south access road</li> </ul>	$\checkmark$	• R 37 / R 130
	<ul> <li>Cost overrun on electrode pond in Labrador</li> </ul>	$\checkmark$	• R 70
	<ul> <li>Bankruptcy of major LCP contractors or suppliers</li> </ul>	$\checkmark$	• KR 26 / KR 5
Low <sup>3</sup>	Limited camp accommodations capacity at Upper Churchill Falls site	$\checkmark$	• KR 5
	Adverse weather conditions	$\checkmark$	<ul> <li>**Time-risk analysis variable</li> </ul>
	<ul> <li>Insufficient air travel to LCP sites</li> </ul>	$\checkmark$	• KR 24
	<ul> <li><sup>1</sup> Included in Nalcor's Decision Gate 3 Project Cost and Schedule Risk Ar</li> <li>R = Risk <sup>3</sup> SNC-Lavalin risk level based on "probable consequence" (furth</li> </ul>	nalysis Report ner details on	t and incorporated into Westney's analysis <sup>2</sup> KR = Key risk, slide 7)

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# The range of outcomes from Westney's analysis were inclusive of the results in SNC-Lavalin's Risk Report

	Westney	SNC-Lavalin		
Cost timing assumptions	<ul> <li>2012 C\$ (at time of estimate)</li> </ul>	<ul> <li>End-of-project costs</li> </ul>		
Estimate basis	<ul> <li>C\$5.465 Billion</li> </ul>	<ul> <li>C\$6.1 Billion stated, which is likely inclusive of contingency (the amount was C\$5.8, excluding contingency)</li> </ul>		
<b>Risk identification</b>	<ul> <li>LCP's risk register and collaborative risk identification sessions with SNC- Lavalin and Nalcor</li> </ul>	<ul> <li>LCP's risk register and discussion with SNC-Lavalin internal experts</li> </ul>		
Risk quantification and modeling	<ul> <li>Ranging of best and worst cases for both "tactical" (i.e., risks around the estimate) and "strategic" risks, with probabilistic modeling of all risks via Monte Carlo simulation techniques</li> </ul>	<ul> <li>Sizing of each risk based on a formula for probable consequence ("consequence" x "probability" x (1 - "manageability))</li> <li>Probable consequences added to determine total risk</li> </ul>		
Analysis completion	• 2012	<ul> <li>2013 (after several key bid packages had been received<sup>2</sup>)</li> </ul>		
Cost-risk results	<ul> <li>C\$5.8 Billion - C\$8.2 Billion<sup>1</sup> (P5 to P95, escalated to end-of-project C\$)</li> </ul>	<ul> <li>C\$8.2 Billion (C\$5.8 Billion + C\$2.4 Billion in risk)</li> </ul>		
<sup>1</sup> P5 to P95 range in 2012 C\$ is C\$5.5 Billio	n - C\$7.4 Billion $^{2}$ SNC had bid information for ~43% of spend a	against the base estimate, while Westney had only ~14 $\%$		

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# Top risks had been identified by Nalcor prior to Decision Gate 2 (2010), with mitigations planned or already underway in 2013

Risk title	SNC-L risked amount (\$ millions)	CIMFP Exhibit P-03171 Nalcor-LCMC response / actions already underway in	Page 11
<ul> <li>High market cost from contractors to be expected</li> </ul>	225	<ul> <li>Bidders were aggressively profiled</li> <li>Almost all packages bid had 4 or more bidders</li> </ul>	
<ul> <li>Limited camp accommodation capacity at Muskrat Falls site</li> </ul>	203	<ul> <li>Design of the "in ground" services was changed to a accommodation blocks to be built as the need arose</li> </ul>	llow for additional camp
<ul> <li>Limited availability of skilled and experienced manpower</li> </ul>	203	<ul> <li>A competitive wage / labour agreement with the He</li> <li>A high quality camp and accommodations was built ( all rooms, central gym, cinema, etc.)</li> <li>An aggressive campaign was executed to attract wor</li> <li>Transportation was streamlined (e.g., charter aircrame)</li> </ul>	bron Project was established (e.g., fiber internet, TVs in rkers from Western Canada ft, bussing from the airport)
<ul> <li>Large packages issued for transmission lines</li> </ul>	180	<ul> <li>First package bid (HVac TL) was broken into small pa significant savings for larger package which was level</li> </ul>	ackages. Bid revealed eraged for the HVdc TL
<ul> <li>Major components outsourcing in China</li> </ul>	168	<ul> <li>An extensive bidding process was conducted and sup reviews were completed for the proposed facilities i</li> <li>LCP had a full-time QA team on-the-ground in China</li> </ul>	plier inspections/quality n China
<ul> <li>Concrete works slippage from baseline schedule</li> </ul>	126	<ul> <li>The project schedule at sanction was recognized as aggressive milestones</li> </ul>	a target schedule with
<ul> <li>River closure slippage from baseline schedule</li> </ul>	96	<ul> <li>To further de-risk schedule, a decision was made in diversion from 2015 to 2016</li> <li>Mitigations resulted in river closure, diversion, and s achieved on schedule</li> </ul>	March of 2013 to move pillway operation being
<ul> <li>Large EPC packages</li> </ul>	90	• 3 bidders were included for the HVDC work, including	ig the civil works
<ul> <li>No geotechnical information for dam</li> </ul>	90	<ul> <li>A decision was made that the in-river geotechnical i offered a much lower cost and schedule risk than po geotechnical engineers</li> </ul>	nvestigations actually rtrayed by SNC-Lavalin's

