

1 **Q.** Reference: Expert Addendum Report of Vincent Musco and Collin Cain (June 5, 2026),
2 Executive Summary, Page 9, Qualitative Risk Analysis (QRA) and Monte Carlo
3 simulation.
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5 The Avalon CT Project consists of a mature, widely deployed technology,
6 well-understood by Hydro (based on its experience with the Holyrood CT),
7 modest in size and complexity relative to many other utility generation
8 projects, and now reasonably well-advanced in terms of costing. These
9 characteristics would seem to be consistent with the application of a QRA
10 method using estimate ranging, which would inherently accommodate a
11 significant project event such as the contracting of the CT packages.
12

- 13 a) How does Bates White define project complexity?
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15 b) What other utility generation projects would be more complex than the Avalon
16 CT Project? Based on what criteria?
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18 c) In Bates White opinion, can a project be considered complex not on the basis of
19 execution alone, but because of other factors such as market volatility, project
20 design and construction logistics (e.g., fuel or water supply), environmental
21 considerations, and the number of contractors and interfaces between them?
22

23 **A.** (a) We consider generation project complexity to be largely related to how common
24 and modular the project components are, and other circumstances such as siting,
25 installation, interconnection and fueling. Based on these criteria, we consider the
26 Avalon CT project to be of relatively low complexity. The LM6000 packages are
27 common and modular. Based on Hydro's Application, the site presents no particular
28 challenges with respect to installation, interconnection or fueling for general
29 operation.
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- 31 (b) Examples of projects more complex than the Avalon CT would include, for example,
32 those requiring more substantial, and unique ancillary engineering work, such as
33 hydro facilities, including BDE Unit 8.
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- 35 (c) We agree that the specified characteristics can contribute to project complexity.