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August 1, 2022

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Re: WBI Energy Transmission, Inc.  
North Bakken Expansion Project  
Docket Nos. CP20-52-000 and CP20-52-001  
Compliance Filing – Post-Construction Cost Comparison

Dear Ms. Bose:

WBI Energy Transmission, Inc. (WBI Energy) hereby submits its cost information pursuant to Section 157.20(c)(3) of the Federal Energy Regulatory Commission's (Commission) regulations and Ordering Paragraph (B)(2) of the Certificate of Public Convenience and Necessity issued June 1, 2021, in the above-referenced dockets authorizing the construction and operation of the North Bakken Expansion Project (Project). The Project was placed into service February 1, 2022.

The attached Exhibit K shows the actual costs incurred as of June 30, 2022, plus any additional estimated costs to be incurred for completion of the authorized facilities as compared to the estimated cost submitted in the amended application filed on July 28, 2020.

Pursuant to 18 CFR § 385.2010 of the Commission's regulations, copies of this filing are being served to each person whose name appears on the official service list for this proceeding.

Any questions regarding this filing should be addressed to the undersigned at (701) 530-1563.

Sincerely,

/s/ Lori Myerchin

Lori Myerchin  
Director, Regulatory Affairs and  
Transportation Services

Cc: Official Service List

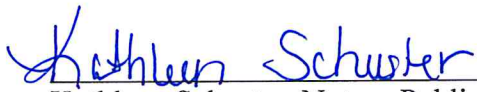
STATE OF NORTH DAKOTA     )  
COUNTY OF BURLEIGH     )

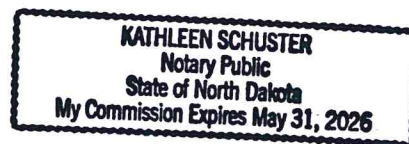
I, Lori Myerchin, being first duly sworn, do hereby depose and say that I am the Director, Regulatory Affairs and Transportation Services for WBI Energy Transmission, Inc.; that I have read the foregoing document; that I know the contents thereof; that I am authorized to execute such document; and that all such statements and matters set forth therein are true and correct to the best of my knowledge, information and belief.

Dated this 1<sup>st</sup> day of August, 2022.

By   
Lori Myerchin  
Director, Regulatory Affairs and  
Transportation Services

Subscribed and sworn to before me this 1<sup>st</sup> day of August, 2022.

  
Kathleen Schuster, Notary Public  
Burleigh County, North Dakota  
My Commission Expires: 05/31/2026



### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 1<sup>st</sup> day of August, 2022.

By   
Lori Myerchin  
Director, Regulatory Affairs and  
Transportation Services

WBI Energy Transmission, Inc.  
1250 West Century Avenue  
Bismarck, ND 58503  
Telephone: (701) 530-1563

WBI Energy Transmission, Inc.  
 Projected Total Cost of Facilities  
 North Bakken Expansion Project

Comparison of estimated and projected total costs to construct the North Bakken Expansion Project.

Line No.	Description	Original Estimate (A) \$	Actual Costs 6/30/2022 (B) \$	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate 1/ (E) \$
1	Right-of-Way	10,916,790	10,806,611	365,792	11,172,403	255,613
2	Damages	1,171,150	907,333	50,000	957,333	(213,817)
3	Surveys	2,316,449	3,388,011	0	3,388,011	1,071,562
4	Materials	71,404,532	73,263,957	65,000	73,328,957	1,924,425
5	Direct Labor	3,398,989	5,583,898	120,000	5,703,898	2,304,909
6	Contract Charges	123,432,416	140,785,216	1,485,000	142,270,216	18,837,800
7	Engineering & Inspection	5,745,763	9,518,545	100,000	9,618,545	3,872,782
8	Legal & Other Fees	500,000	211,719	400,000	611,719	111,719
9	Administrative Overhead (AO)	849,515	1,276,750	0	1,276,750	427,235
10	AFUDC	7,086,625	9,654,235	0	9,654,235	2,567,610
11	Contingencies	22,397,213	0	0	0	(22,397,213)
12	Other Direct Costs	11,248,823	8,409,397	25,000	8,434,397	(2,814,426)
13	Total Estimated Cost of Facilities	<u>260,468,265</u>	<u>263,805,672</u>	<u>2,610,792</u>	<u>266,416,464</u>	<u>5,948,199</u>

1/ Please refer to the detail of the facilities on pages 2-5 for an explanation of the variance between the original estimate and the projected total cost.

WBI Energy Transmission, Inc.  
Pipeline Facilities  
North Bakken Expansion Project

Comparison of estimated and projected total costs to construct 63.1 miles of 24-inch, 29.9 miles of 12-inch, .5 miles of 20-inch and .2 miles of 8-inch pipeline in Burke, Mountrail, Williams, and McKenzie Counties, ND.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 6/30/2022 (B) \$	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate (E) \$
1	Right-of-Way	10,423,299	10,505,811	365,792	10,871,603	448,304
2	Damages	1,171,150	907,333	50,000	957,333	(213,817)
3	Surveys	2,269,430	3,329,580	0	3,329,580	1,060,150 1/
4	Materials	42,517,152	46,557,644	15,000	46,572,644	4,055,492
5	Direct Labor	1,896,448	2,089,372	50,000	2,139,372	242,924
6	Contract Charges	111,396,190	121,568,592	1,200,000	122,768,592	11,372,402
7	Engineering & Inspection	4,682,266	8,928,204	100,000	9,028,204	4,345,938 2/
8	Legal & Other Fees	500,000	211,719	400,000	611,719	111,719 3/
9	Administrative Overhead (AO)	544,889	902,371	0	902,371	357,482 4/
10	AFUDC	4,243,816	6,451,076	0	6,451,076	2,207,261 5/
11	Contingencies	16,692,110	0	0	0	(16,692,110) 6/
12	Other Direct Costs	828,476	1,323,827	0	1,323,827	495,351 7/
13	Total Pipeline Facilities	<u>197,165,226</u>	<u>202,775,529</u>	<u>2,180,792</u>	<u>204,956,321</u>	<u>7,791,095</u>

1/ Given the expedited late summer construction schedule, multiple survey crews were required to cover the multiple work fronts being constructed simultaneously.

2/ A greater number of inspectors were employed to monitor the multiple work fronts to allow for proper compliance and quality.

3/ Higher fees for easement negotiation than estimated.

4/ Increased expenditures coupled with higher than estimated quarterly AO rates resulted in higher overhead costs.

5/ AFUDC was originally estimated based on the estimated cost of the project facilities and within an estimated construction timeline. AFUDC is higher than the original estimate due to the booking of AFUDC based on actual costs incurred during the actual construction timeframe.

6/ Amounts estimated for contingency were utilized across all categories as applicable.

7/ Included in Other Direct Costs were lodging and meals costs which were greater post COVID-19 pandemic; increased frequency of overnight travel accommodations; and temporary easements higher than estimated.

WBI Energy Transmission, Inc.  
Compressor Stations  
North Bakken Expansion Project

Comparison of estimated and projected total costs to construct the new Elkhorn Creek Compressor Station (3,750 hp) in McKenzie County, ND, and expand the Tioga Compressor Station (additional 11,250 hp) in Williams County, ND.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 6/30/2022 (B) \$	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate (E) \$	
1	Right-of-Way	255,000	200,000	0	200,000	(55,000)	1/
2	Damages	0	0	0	0	0	
3	Surveys	16,174	56,432	0	56,432	40,258	2/
4	Materials	25,088,080	24,537,834	50,000	24,587,834	(500,246)	
5	Direct Labor	955,890	2,522,448	65,000	2,587,448	1,631,558	3/
6	Contract Charges	11,426,104	18,120,882	205,000	18,325,882	6,899,778	4/
7	Engineering & Inspection	893,526	590,342	0	590,342	(303,184)	5/
8	Legal & Other Fees	0	0	0	0	0	
9	Administrative Overhead (AO)	195,180	278,802	0	278,802	83,622	6/
10	AFUDC	1,816,956	2,212,133	0	2,212,133	395,177	7/
11	Contingencies	4,200,000	0	0	0	(4,200,000)	8/
12	Other Direct Costs	443,561	539,422	25,000	564,422	120,861	9/
13	Total Compressor Station Costs	<u>45,290,471</u>	<u>49,058,294</u>	<u>345,000</u>	<u>49,403,294</u>	<u>4,112,823</u>	

1/ Land cost lower than original estimate.

2/ Civil surveys for Elkhorn Creek Station more significant than originally estimated.

3/ Prefabrication, safety, project management, inspection and commissioning required significantly more company resources than originally estimated.

4/ Higher Contract Charges due to winter construction including winter commissioning of stations.

5/ Majority of inspection performed by company personnel with costs included in Direct Labor.

6/ Increased expenditures coupled with higher than estimated quarterly AO rates resulted in higher overhead costs.

7/ AFUDC was originally estimated based on the estimated cost of the project facilities and within an estimated construction timeline. AFUDC is higher than the original estimate due to the booking of AFUDC based on actual costs incurred during the actual construction timeframe.

8/ Amounts estimated for contingency were utilized across all categories as applicable.

9/ Increased duties by company personnel resulted in increased travel, meals, and accommodation costs.

WBI Energy Transmission, Inc.  
Measurement Facilities  
North Bakken Expansion Project

Comparison of estimated and projected total cost to replace the Tioga Plant Receipt Station, Lignite Plant Receipt Station and Lignite Town Border Station; upgrade the Norse Plant Receipt Station and Robinson Lake Plant Receipt Station; and construction of the Norse Transfer Station.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 6/30/2022 (B) \$	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate (E) \$
1	Right-of-Way	224,681	20,800	0	20,800	(203,881) 1/
2	Damages	0	0	0	0	0
3	Surveys	17,140	2,000	0	2,000	(15,140) 2/
4	Materials	3,737,884	2,142,282	0	2,142,282	(1,595,602) 3/
5	Direct Labor	488,620	880,937	5,000	885,937	397,317 4/
6	Contract Charges	415,022	654,956	60,000	714,956	299,934 5/
7	Engineering & Inspection	169,971	0	0	0	(169,971) 6/
8	Legal & Other Fees	0	0	0	0	0
9	Administrative Overhead (AO)	32,829	14,221	0	14,221	(18,608) 7/
10	AFUDC	298,884	111,867	0	111,867	(187,017) 8/
11	Contingencies	522,003	0	0	0	(522,003) 9/
12	Other Direct Costs	171,378	290,475	0	290,475	119,097 10/
13	Total Interconnect at Viking Costs	<u>6,078,412</u>	<u>4,117,539</u>	<u>65,000</u>	<u>4,182,539</u>	<u>(1,895,873)</u>

1/ Certain tracts for station facilities were provided by customer without the need for purchase.

2/ Minimal survey work required by company personnel.

3/ Revisions to design, location and layout of facilities resulted in reduced costs.

4/ Engineering, fabrication, construction and inspection required more company resources than estimated.

5/ Civil work, painting and fencing was higher than originally estimated.

6/ Engineering and select inspection included in Direct Labor; weld inspection included in Contract Charges.

7/ Increased expenditures coupled with higher than estimated quarterly AO rates resulted in higher overhead costs.

8/ AFUDC was originally estimated based on the estimated cost of the project facilities and within an estimated construction timeline. AFUDC is higher than the original estimate due to the booking of AFUDC based on actual costs incurred during the actual construction timeframe.

9/ Amounts estimated for contingency were utilized across all categories as applicable.

10/ Increased duties by company personnel resulting in increased travel, meals, and accommodation costs.

WBI Energy Transmission, Inc.  
Northern Border Interconnect  
North Bakken Expansion Project

Comparison of estimated and projected total costs to construct new interconnect facilities with Northern Border Pipeline in McKenzie County, ND.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 6/30/2022 (B) \$	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate (E) \$	
1	Right-of-Way	13,810	80,000	0	80,000	66,190	1/
2	Damages	0	0	0	0	0	
3	Surveys	13,705	0	0	0	(13,705)	2/
4	Materials	61,416	26,196	0	26,196	(35,220)	3/
5	Direct Labor	58,031	91,142	0	91,142	33,111	4/
6	Contract Charges	195,100	440,786	20,000	460,786	265,686	5/
7	Engineering & Inspection	0	0	0	0	0	
8	Legal & Other Fees	0	0	0	0	0	
9	Administrative Overhead (AO)	76,617	81,356	0	81,356	4,739	
10	AFUDC	726,970	879,158	0	879,158	152,189	6/
11	Contingencies	983,100	0	0	0	(983,100)	7/
12	Other Direct Costs	9,805,408	6,255,673		6,255,673	(3,549,735)	8/
13	Total	<u>11,934,156</u>	<u>7,854,311</u>	<u>20,000</u>	<u>7,874,311</u>	<u>(4,059,845)</u>	

1/ Higher than anticipated cost for tract and access road.

2/ Survey and civil plan captured under Contract Charges.

3/ Reduced WBI Energy scope of work.

4/ Increased project management coordination with interconnecting company.

5/ Facility site and access road required significantly more preparation than originally estimated.

6/ AFUDC was originally estimated based on the estimated cost of the project facilities and within an estimated construction timeline. AFUDC is higher than the original estimate due to the booking of AFUDC based on actual costs incurred during the actual construction timeframe.

7/ Amounts estimated for contingency were not utilized for the interconnect facilities.

8/ Interconnect completed below estimated cost.