

1250 West Century Avenue Mailing Address: P.O. Box 5601 Bismarck, ND 58506-5601 (701) 530-1600

May 30, 2025

Debbie-Anne Reese, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, D.C. 20426

Re: WBI Energy Transmission, Inc. Wahpeton Expansion Project

Docket No. CP22-466-000

Compliance Filing – Post-Construction Cost Comparison

Dear Ms. Reese:

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 October 23, 2023, in the above-referenced docket authorizing the construction and operation of the Wahpeton Expansion Project (Project). The Project was placed into service December 1, 2024.

The attached Exhibit K shows the actual costs incurred as of April 30, 2025, plus any additional estimated costs to be incurred for completion of the authorized facilities as compared to the estimated cost submitted in the application filed on May 27, 2022.

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 Vice President, Regulatory Affairs and Transportation Services

Attachment

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 Vice President, 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 30th day of May, 2025.

Lori Myerchin

Vice President, Regulatory Affairs and

Transportation Services

Subscribed and sworn to before me this 30th day May, 2025.

Kathleen Schuster, Notary Public Burleigh County, North Dakota

My Commission Expires: 05/31/2026

KATHLEEN SCHUSTER Notary Public State of North Dakota My Commission Expires May 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 30 day of May, 2025.

By <u>Lori Myerchin</u>
Lori Myerchin
Vice President, 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 Wahpeton Expansion Project

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

		Original Estimate	Actual Costs 4/30/2025	Estimated Costs to Complete Project	Projected Total Cost	Over/(Under) Original Estimate 1/
Line		(A)	(B)	(C)	(D)	(E)
No.	Description	\$	\$	\$	\$	\$
1	Right-of-Way	2,302,958	3,398,127	247	3,398,374	1,095,416
2	Damages	377,600	1,133,745	834,658	1,968,403	1,590,803
3	Surveys	1,188,000	5,085,114	60,000	5,145,114	3,957,114
4	Materials	16,320,091	15,808,126	87,897	15,896,023	(424,068)
5	Direct Labor	2,338,601	1,854,510	308,288	2,162,798	(175,803)
6	Contract Charges	39,559,805	32,171,957	1,794,360	33,966,317	(5,593,488)
7	Engineering & Inspection	1,948,050	5,329,734	417,201	5,746,935	3,798,885
8	Legal & Other Fees	150,000	123,826	0	123,826	(26,174)
9	Administrative Overhead (AO)	1,002,926	603,130	63,944	667,074	(335,852)
10	AFUDC	2,687,017	2,374,318	0	2,374,318	(312,699)
11	Contingencies	6,512,504	0	0	0	(6,512,504)
12	Other Direct Costs	925,470	801,414	196,923	998,337	72,867
13	Total Estimated Cost of Facilities	75,313,022	68,684,001	3,763,518	72,447,519	(2,865,503)

^{1/} Please refer to the detail of the facilities on pages 2-4 for an explanation of the variance between the original estimate and the projected total cost.

WBI Energy Transmission, Inc. Pipeline Facilities Wahpeton Expansion Project

Comparison of estimated and projected total costs to construct 59.07 miles of 12-inch pipeline in Cass and Richland Counties, ND.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 4/30/2025 (B)	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate (E) \$
1	Right-of-Way	2,255,958	3,279,807	0	3,279,807	1,023,849 1/
2	Damages	377,600	1,133,745	834,658	1,968,403	1,590,803 2/
3	Surveys	1,161,000	5,085,114	60,000	5,145,114	3,984,114 3/
4	Materials	15,507,707	14,893,891	50,276	14,944,167	(563,540)
5	Direct Labor	2,054,237	1,511,018	299,288	1,810,306	(243,931)
6	Contract Charges	39,281,805	31,360,500	1,744,241	33,104,741	(6,177,064)
7	Engineering & Inspection	1,896,517	5,303,928	417,201	5,721,129	3,824,612 4/
8	Legal & Other Fees	140,000	123,826	0	123,826	(16,174)
9	Administrative Overhead (AO)	979,510	578,428	63,131	641,559	(337,951) 5/
10	AFUDC	2,613,183	2,326,826	0	2,326,826	(286,357)
11	Contingencies	6,360,454	0	0	0	(6,360,454) 6/
12	Other Direct Costs	884,100	676,124	195,438	871,562	(12,538)
13	Total Pipeline Facilities	73,512,071	66,273,207	3,664,233	69,937,440	(3,574,631)

^{1/} Higher than anticipated right-of-way easement cost per tract.
2/ Additional payments were made to landowners due to the number of Alternate Current Voltage Gradient (ACVG) excavations required.
3/ Increased survey costs due to biological and cultural surveys conducted for reroutes and additional access roads. Also, landowner requests required staking crews to remove and re-stake areas multiple times to allow for agricultural activities.

^{4/} Due to weather impacts, increased the number of environmental inspectors and their duration of time on the project.

^{5/} Decreased expenditures resulted in lower overhead costs.

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

WBI Energy Transmission, Inc. Mapleton Compressor Station Wahpeton Expansion Project

Comparison of estimated and projected total costs for modifications at the existing Mapleton Compressor Station.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 4/30/2025 (B)	Estimated Costs to Complete Project (C) \$	Projected Total Cost (D) \$	Over/(Under) Original Estimate (E) \$
1	Right-of-Way	5,000	0	0	0	(5,000) 1/
2	Damages	0	0	0	0	0
3	Surveys	7,000	0	0	0	(7,000) 2/
4	Materials	356,690	230,359	0	230,359	(126,331) 3/
5	Direct Labor	121,705	191,041	0	191,041	69,336 4/
6	Contract Charges	100,000	110,259	50,119	160,378	60,378 5/
7	Engineering & Inspection	23,450	14,070	0	14,070	(9,380) 6/
8	Legal & Other Fees	2,500	0	0	0	(2,500) 7/
9	Administrative Overhead (AO)	9,804	6,458	0	6,458	(3,346) 8/
10	AFUDC	29,978	17,988	0	17,988	(11,990) 9/
11	Contingencies	63,660	0	0	0	(63,660) 10/
12	Other Direct Costs	20,250	100,888	0	100,888	80,638 11/
13	Total Compressor Station Costs	740,037	671,063	50,119	721,182	(18,855)

- 1/ No additional land purchases or easements were required.
- 2/ No surveys were required due to modification activities occurring in pre-disturbed areas.
- 3/ Lower actual material costs than originally estimated.
- 4/ Increase in direct labor due to extended construction schedule.
- 5/ Additional mobilization costs for painting of station piping.
- 6/ X-ray inspection costs lower than estimated.
- 7/ No legal fees were incurred for the work done at the station.
- 8/ Decreased expenditures resulted in lower overhead costs.
- 9/ AFUDC was originally estimated based on the estimated cost of the project facilities and within an estimated construction timeline. AFUDC is lower than the original estimate due to the booking of AFUDC based on actual costs incurred during the actual construction timeframe.
- 10/ Amounts estimated for contingency were utilized across all categories as applicable.
- 11/ Increased duties by company personnel resulted in increased travel, meals, and accommodation costs.

WBI Energy Transmission, Inc. Measurement Facilities Wahpeton Expansion Project

Comparison of estimated and projected total cost to construct the Kindred and Wahpeton delivery stations in Cass and Richland Counties, ND.

Line No.	Description	Original Estimate (A) \$	Actual Costs as of 4/30/2025 (B)	Estimated Costs to Complete Project (C)	Projected Total Cost (D)	Over/(Under) Original Estimate (E) \$
1	Right-of-Way	42,000	118,320	247	118,567	76,567 1/
2	Damages	0	0	0	0	0
3	Surveys	20,000	0	0	0	(20,000) 2/
4	Materials	455,694	683,876	37,621	721,497	265,803 3/
5	Direct Labor	162,659	152,451	9,000	161,451	(1,208)
6	Contract Charges	178,000	701,198	0	701,198	523,198 4/
7	Engineering & Inspection	28,083	11,736	0	11,736	(16,347) 5/
8	Legal & Other Fees	7,500	0	0	0	(7,500) 6/
9	Administrative Overhead (AO)	13,612	18,244	813	19,057	5,445 7/
10	AFUDC	43,856	29,504	0	29,504	(14,352) 8/
11	Contingencies	88,390	0	0	0	(88,390) 9/
12	Other Direct Costs	21,120	24,402	1,485	25,887	4,767
13	Total Measurement Costs	1,060,914	1,739,731	49,166	1,788,897	727,983

- 1/ Increased costs due to larger than anticipated pad for facilities at the Kindred and Wahpeton delivery stations.
- 2/ These costs are included with the pipeline facilities survey costs.
- 3/ Increased cost for fill material as a result of larger than estimated pad for facilities.
- 4/ Additional contractors above what was estimated were required for the project.
- 5/ Some engineering and inspection costs are included in the pipeline facilities engineering and inspection costs.
- 6/ No legal fees were incurred for the work done at the delivery stations.
- 7/ Increased expenditures 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 lower 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.