

**CONTINUED DEPOSITION OF CARLETTE WALKER
October 30, 2018**

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Video Technician: Michael M. Arrison
Also Present: Gene Walker

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	34	Email & Notes	207/09
18	35	Email	225/15
	36	Email	230/22

18
19 ** Uh-huh = Affirmative
 Huh-uh = Negative

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1 S T I P U L A T I O N S

2 It is stipulated among Counsel that this
3 deposition is being taken pursuant to the South
4 Carolina Rules of Civil Procedure; and that all
5 objections, except as to the form of the question,
6 are reserved until the time of trial.

7 It is also stipulated among Counsel for the
8 respective parties and the deponent that the
9 deponent will waive the right to read and sign
10 this transcript.

11 THEREUPON,

12 VIDEO TECHNICIAN: This is the
13 videotaped deposition of Carlette Walker, Volume
14 Two, taken by the defendant in the matter of Richard
15 Lightsey, et. al. versus South Carolina Electric and
16 Gas Company, et. al., filed in the Court of Common
17 Pleas, State of South Carolina, in Hampton County.
18 The case number is 2017-CP-25-0335. This deposition
19 is being held at the Moore Taylor Law Firm located
20 at 1700 Sunset Boulevard in West Columbia, South
21 Carolina on Tuesday, October the 30th, 2018. My
22 name is Michael Arrison, your videographer. And the
23 court reporter is Erica Creel and we are here with
24 C.S.I. Global Deposition Services. We're going on
25 the record at 10:17 a.m. Will Counsel now state

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1 their appearance for the record.

2 Mr. Balser: Good morning, Ms. Walker.
3 My name is David Balser. I'm with the law firm of
4 King and Spalding in Atlanta. I represent SCANA and
5 SCE&G. And I want to make one correction to the
6 record with respect to the case and cases for which
7 this deposition is noticed. The deposition was
8 noticed in the Lightsey case as was indicated. It's
9 also been cross-noticed in the pending Public
10 Service Commission proceeding. So this deposition
11 is being taken for the purposes in both the rate
12 payer litigation and the regulatory proceeding.

13 MS. NOBLES: Good morning, Ms. Walker.
14 My name is Paige Nobles. I also work with
15 Mr. Balser at King and Spalding and here on behalf
16 of SCANA and SCE&G.

17 MS. HODGES: I'm Byrony Hodges. I'm the
18 assistant general counsel of SCANA and SCE&G.

19 Ms. Moody: Leah Moody. I represent
20 SCANA and SCE&G.

21 MR. SCHMALZBACH: Good morning, Brian
22 Schmalzbach of Maguire Woods, L.L.P. for Dominion
23 Energy, Inc.

24 MR. BELL: Kevin Bell on behalf of
25 Central Electric Power Property.

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1 MR. COX: Jim Cox from the Wyche Law
2 Firm in Greenville, representing the South Carolina
3 Office of Regulatory Staff in the consolidated
4 dockets in the Public Service Commission and in the
5 state court action.

6 MR. HALTIWANGER: Dan Haltiwanger, again
7 from Richardson Patrick, Westbrook and Brickman and
8 I represent the plaintiff class of rate payers.

9 MR. RICHARDSON: And Terry Richardson.
10 I also represent the consumers.

11 MR. MOORE: I'm Jake Moore. I represent
12 you.

13 MR. SMITH: Good morning. I'm Emory
14 Smith from the attorney general's office. I
15 represent the State of South Carolina in the
16 Lightsey case and the State (inaudible) Wilson,
17 Attorney General, in the O.R.S.B.S.C. proceeding.

18 VIDEO TECHNICIAN: Counsel on the phone.

19 MS. THOMAS: This is Carmen Thomas. I'm
20 with Nelson Mullins and we represent the South
21 Carolina Public Service Authority known as Santee
22 Cooper.

23 MS. KING: (inaudible) King for the
24 Lightsey plaintiff.

25 MS. PITTMAN: Jenny Pittman for O.R.S.

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1 MR. SOULT: Gene Soutl for O.R.S.

2 MR. THOMPSON: Ryder Thompson with
3 O.R.S.

4 MR. AIKEN: Ron Aiken with O.R.S.

5 VIDEO TECHNICIAN: Will the court
6 reporter -- excuse me.

7 MR. ALPHIN: John Alphin, with the Strom
8 Law Firm for the plaintiff class.

9 MR. BALSER: Who was that?

10 Mr. Alphin: John Alphin --

11 MR. BALSER: JOHN Alphin, A-L-P-H-I-N.
12 A-L-P-H-I-N.

13 MR. SMITH: I'd just like to note that
14 John Williams of the attorney general's office may
15 also call in at some point either to cover for me or
16 to -- to listen in also. And he rep--- would be for
17 the same parties that I just mentioned.

18 VIDEO TECHNICIAN: Counsel, state your
19 appearance. You just joined.

20 MR. GALVIN: Greg Galvin, plaintiff.

21 VIDEO TECHNICIAN: All right. The court
22 reporter will now swear in the witness.

23 COURT REPORTER: Ma'am, can you raise
24 your right hand.

25 Carlette Walker,

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1 being first duly sworn by the court reporter, as
2 hereinafter certified, testified as follows:

3 E X A M I N A T I O N

4 By Mr. Balser:

5 Q **Good morning, Ms. Walker.**

6 A Good morning.

7 Q **I want to go over some of the ground**
8 **rules of the deposition even though those were**
9 **explained to you in the prior deposition that --**
10 **that Mr. Haltiwanger began. As you know, we have a**
11 **court reporter here who is sitting to your right,**
12 **who is going to transcribe everything that's said**
13 **today. So it's important for you to permit me to**
14 **finish asking my question before you begin to**
15 **answer. And I will try very hard to permit you to**
16 **finish your answer before I ask my next question.**
17 **Okay?**

18 A Okay.

19 Q **I'm going to try to make my questions as**
20 **clear and understandable as possible. But I'm not**
21 **always perfect at that. So if I ask a question that**
22 **you don't understand, please let me know and I will**
23 **endeavor to ask you a question that you understand.**
24 **Okay?**

25 A Okay.

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1 Q If I ask you a question and you answer
2 it, I'm going to assume that you heard it and
3 understood it. Is that fair?

4 A Fair.

5 Q Okay. At any time during the course of
6 these proceedings, if you need to take a break, you
7 just let me know and we will accommodate you. Okay?

8 A Okay.

9 Q This is not an endurance contest. There
10 are a lot of people in this room. Understand it's
11 not the -- the least stressful environmental so if
12 at any point, you feel like you need a break, you
13 can tell us and we will accommodate you. Okay?

14 A Okay.

15 Q You understand that the oath that the
16 court reporter just administered is the same oath
17 that you would be administered if you were in court
18 and has the same effect and solemnity.

19 A I do.

20 Q Okay.

21 MR. MOORE: If I could just put on
22 record before we start.

23 Mr. Balser: Sure.

24 MR. MOORE: Ms. Walker has had some
25 serious emotional issues since her experience with

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1 SCANA. She is under a doctor's care right now and
2 she is under medication. She is capable of
3 providing a deposition. However, I would ask that
4 we proceed with caution, understanding that she is
5 in a fragile emotional state. And I would also ask
6 that if and when the proceedings get to be overly
7 tiresome for her, if we have to adjourn we will and
8 we'll come back and finish it. We went several
9 hours last time. And I'm not sure how long she is
10 good for today. But she will tell us and I've asked
11 her to tell us. But I've also asked her to bite the
12 bullet and try to get us as far through this as we
13 can.

14 Mr. Balser: Thank you, Jake.

15 MR. MOORE: Thank you.

16 By Mr. Balser:

17 Q Ms. Walker, with that -- with those
18 admonitions from Mr. Moore, can -- can you tell us
19 what medications you're under currently? Are you
20 currently taking any medications?

21 A No.

22 Q Okay. All right. Is there -- is there
23 any reason that you can't give full and accurate
24 testimony this morning?

25 A No.

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1 Q Okay. I just wanted to make sure I
2 didn't misunderstand --

3 A No.

4 Q -- Mr. Moore. Okay. It's been a while
5 since we were last together. I think it was back in
6 April when your -- the first round of your
7 deposition occurred. Have you had any discussions
8 with anyone about this case -- when I say about this
9 case, I mean, either the rate payer litigation or
10 the P.S.C. proceedings since your last deposition
11 other than Mr. Moore?

12 A I've had lots of people have sent me
13 text messages mak--- making inquiries about it.

14 Q Have you had any oral discussions with
15 anyone about the cases?

16 A Not that I know of or can remember.
17 I've read the newspaper. People have talked to me
18 about the article.

19 Q Has anyone from SCANA or SCE&G contacted
20 you since your last deposition?

21 A Yes.

22 Q Who is that?

23 A I've gotten text messages from an
24 accountant at SCE&G.

25 Q And who --

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1 A Just wishing me good luck because they
2 saw on the P.S.C. website that I was going to be
3 deposed today.

4 **Q Who is that accountant?**

5 A Andrea Stewart.

6 **Q Have you talked to anyone who has been**
7 **deposed in the case?**

8 A Yes.

9 **Q Who have you spoken with who's been**
10 **deposed?**

11 A Ken Brown.

12 **Q And what was the substance of the**
13 **conversation you had with Mr. Brown?**

14 A Simply that it went from 9:00 to 9:00
15 and that it was miserable.

16 **Q So you spoke with Mr. Brown after he had**
17 **been deposed?**

18 A After I saw his name in the paper,
19 yes.

20 **Q And did you reach out to Mr. Brown or**
21 **did he reach out to you?**

22 A I re--- reached out to him.

23 **Q Have you done anything to prepare for**
24 **your deposition today?**

25 A I read what was on the P.S.C. website

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1 as the redacted testimony that I had given it --
2 in April.

3 Q Okay. So you read your -- the -- the
4 prior version -- and I mean, I'm sorry -- you read
5 the transcript in redacted form that had been filed
6 with the Public Service Commission?

7 A That's right.

8 Q Did you look at anything else -- any
9 other materials in --

10 A No.

11 Q -- preparation for your deposition?

12 A No.

13 Q Have you reviewed any transcripts from
14 any other depositions taken in either the rate payer
15 litigation or the Public Service Commission
16 proceeding?

17 A No.

18 Q Have you ever spoken with any of the --
19 any of the lawyers in this room other than
20 Mr. Moore?

21 A No.

22 Q Have you spoken with any lawyers who are
23 not in this room who represent either the plaintiffs
24 or the Office of Regulatory staff?

25 A No.

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1 Q Have you spoken with any lawyers who
2 repre--- represent the State of South Carolina in
3 this case?

4 A No.

5 Q Now, Ms. Walker, you mentioned before we
6 got on the record that you had had some interactions
7 with the Federal Bureau of Investigation. I want to
8 talk to you a little bit about that. Has anyone
9 ever told you that they wanted your help in trying
10 to prove that any former or current officers of
11 South Carolina Electric and Gas or SCANA engaged in
12 wrongful conduct?

13 A Repeat the first part of that.

14 Q Has anyone told you that they wanted
15 your help in trying to prove that someone had
16 engaged in wrong --

17 A I'm not going to discuss anything I
18 talked to the F.B.I. about. If that's where
19 you're going with that.

20 Q Well, on -- on what basis would you --
21 are you refusing to answer those questions?

22 A Because it was supposed to be
23 confidential what I talked to them about.

24 Q Okay. Well, I'm going to -- I'm going
25 to make the record and I'm going to ask you the

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1 **questions and if you refuse to answer, I can't force**
2 **you to. But I'm going to ask the questions.**

3 MR. MOORE: Go ahead.

4 THE DEPONENT: Well, you can ask, but
5 I'm -- I've been told by the F.B.I. that what my --
6 our discussion was, was confidential.

7 Mr. Balser: Okay. Well, we have the
8 right to inquire as to what you spoke to the F.B.I.
9 about.

10 THE DEPONENT: You can inquire, but I
11 can refuse to answer.

12 MR. MOORE: Carlette. Carlette, it's --
13 it's okay. Tell them what the -- tell them what the
14 F.B.I. -- it's okay. Let them know what the F---
15 it's fine.

16 THE DEPONENT: To tell them what the
17 F.B.I. talked to me --

18 MR. MOORE: Sure.

19 THE DEPONENT: -- about?

20 MR. MOORE: Absolutely.

21 By Mr. Balser:

22 **Q Okay. So let's start at the beginning.**
23 **When did you first have a conversation with any**
24 **representative of the Federal Bureau of**
25 **Investigations?**

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1 A I didn't mark the date that they came
2 out to the house.

3 **Q Approximately, when did the first**
4 **meeting with the F.B.I. occur?**

5 A I have no idea.

6 **Q Was it this year?**

7 A No.

8 **Q Was it in 2017?**

9 A I think so.

10 **Q Last year? Okay. Tell me what you**
11 **remember about the first meeting.**

12 A They simply showed up at our house,
13 introduced themselves and then I think they made
14 arrangements for us to meet them somewhere to have
15 a sit down discussion.

16 **Q In the first meeting when an agent**
17 **showed up at your house, what time of day was it**
18 **approximately?**

19 MR. WALKER: In the morning sometime.

20 THE DEPONENT: Yeah, it was the morning.

21 MR. MOORE: All right. Gene, you can't
22 talk.

23 MR. WALKER: Oh, I'm sorry. I'm sorry.

24 THE DEPONENT: Well, I was going to look
25 to you and see if you could -- because I can't

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1 remember. Morning.

2 By Mr. Balser:

3 **Q Do you remember who from the F.B.I.**
4 **Appeared at your house?**

5 A Aaron Hawkins and -- I can't remember
6 the other guy's name.

7 **Q Okay. Was anyone from any state law**
8 **enforcement agency with them at that time?**

9 A An off--- a guy from SLED.

10 **Q Okay.**

11 A I don't remember his name.

12 **Q How long did they stay at your house**
13 **during that first meeting?**

14 A Now, the guy from SLED was not at our
15 house.

16 **Q Okay.**

17 A They weren't there that long. I'd
18 say, maybe 30, 45 minutes.

19 **Q And did they -- were they asking you**
20 **questions at that time?**

21 A Not really.

22 **Q What were --**

23 A It was more about just get to know
24 you. You know, just wanted to introduce
25 themselves to me and let me know that they were

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1 going to seek out a chance to be able to interview
2 me as it relates to my time at the project and
3 what my experience was as far as what was going on
4 at the project when I resigned.

5 **Q And did you make arrangements with them**
6 **at that time to meet with them for a subsequent**
7 **discussion or interview?**

8 A I can't remember if they called back
9 with a schedule time. And I can't even remember
10 where we met. But we had a subsequent meeting and
11 the other guy was the designated note taker. And
12 Aaron asked questions and the other guy did too.
13 And then SLED was there. There was a
14 representative from SLED. And we talked for the
15 better part of a day.

16 **Q Did they show you any documents during**
17 **that interview session?**

18 A No. I don't think so.

19 **Q Did you show them any documents during**
20 **that interview session?**

21 A No.

22 **Q Since you met with them for an entire**
23 **day, I'm not going to ask you to recite verbatim**
24 **what --**

25 A No. I couldn't.

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1 Q -- what --what occurred, but te--- tell
2 us to the best of your recollection what the -- what
3 the general subject matter areas were that they were
4 inquiring about.

5 A It was from what my experience was for
6 the six years while I was at the project. What my
7 role was all the way up until the time when I felt
8 like I could no longer be a party to the project
9 or continue my employment with SCANA --

10 Q Did they --

11 A -- because of ethics.

12 Q In -- in any of the discussion -- well,
13 in that fr--- in that discussion that you're
14 describing that is that all day meeting, did Agent
15 Hawkins or the other agent indicate to you that they
16 wanted your help in trying to prove that others at
17 SCANA or SCE&G had engaged in wrongdoing?

18 A They just simply wanted to know the
19 facts.

20 Q Okay. But my question was a little
21 different. And I -- I appreciate your answer. But
22 did they tell you that they wanted your help in
23 trying to prove that others at SCANA or SCE&G had
24 engaged in wrongdoing?

25 A I don't think that they were really

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1 prejudiced to trying to find wrongdoing. I think
2 that what they were trying to do was just figure
3 out what had happened at the project and why it
4 was abandoned in July of '17 so abruptly.

5 **Q Did they tell you how they found you and**
6 **why they came to your house? And why they sought**
7 **you out as a witness?**

8 A They said that there were other --
9 there were engineers and -- that seemed to
10 continue to bring my name up.

11 **Q Okay. Other than the meeting at your**
12 **house where they showed up -- and I assume they**
13 **showed up unannounced. Is that right?**

14 A That's correct.

15 **Q They just knocked on the door and said**
16 **we're with the F.B.I.?**

17 A Well, they didn't quite get to the
18 door, but more or less.

19 **Q Okay. In addit--- other than the**
20 **meeting at your house that you described and the all**
21 **day meeting that you just described, have you had**
22 **any other meetings or discussions with the Federal**
23 **Bureau of Investigations?**

24 A No.

25 **Q Have you met with --**

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1 A Now, se--- go back one second. What
2 did you -- what was that question?

3 **Q The question was, other than the two**
4 **meetings that you've already told me about, the**
5 **first one at your house --**

6 A Uh-huh.

7 **Q -- and then all day interview session,**
8 **have you had any other discussions or meetings with**
9 **the Federal Bureau of Investigation?**

10 A I did call the F.B.I., specifically
11 Aaron, probably about three-and-a-half weeks ago
12 because of somebody that came to mind that I had
13 not discussed with them. And I wanted to make
14 them aware of one other person that was a regular
15 at the project from SCANA Services --

16 **Q And --**

17 A -- that I had forgotten to mention.

18 **Q And who was it that you mentioned to Mr.**
19 **Hawkins in that phone call?**

20 A Mark Cannon.

21 **Q And what did you tell Mr. Hawkins about**
22 **Mr. Cannon?**

23 A That Mr. Cannon was the treasurer and
24 the risk management officer of SCANA. And that he
25 regularly attended the monthly project review

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1 meetings. He sat in the back. Routinely, took
2 notes. He met on a routine basis with me with the
3 C.E.O. of SCANA, which would be Kevin Marsh. I
4 got the impression that he was on a similar page
5 to me and that he saw a lot of risk at the
6 project. And seemed to be pushing for Kevin Marsh
7 to get involved in the project because the project
8 was not going well. So at the time when I was
9 showing him performance factors that were
10 unreasonable and would drive most people, I would
11 have thought to intervene into the project. He
12 was showing him other things that were also
13 extraordinarily high risk. Yet Kevin, the C.E.O.,
14 didn't seem to respond or come to any project
15 meetings. And I warned Aaron that given that I
16 had mischaracterized Kevin Marsh so poorly that I
17 may have mischaracterized Mark Cannon. And he
18 could have been a bad guy just like Kevin Marsh
19 was. So don't use my judgment on character that
20 Mark Cannon could be a liar just like Kevin Marsh
21 and I wouldn't have seen it.

22 **Q What information did you understand or**
23 **believe that Mr. Cannon was sharing with Mr. Marsh**
24 **that indicated that the project was experiencing**
25 **risk?**

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1 A I can't even remember what Mark was
2 talking about because I was so overwhelmed and so
3 upset about the performance factor and the change
4 orders that were so astronomical that I couldn't
5 even listen to what Mark was talking about. But I
6 remember him having a lot of stress in his voice.
7 And he and I both going into those meetings
8 stressed and upset, looking for Kevin to step up
9 to the plate and do something different than they
10 had done in previous months and years. Because
11 the project was in terrible shape despite what
12 they were reporting to the public.

13 **Q Other than the meeting at your house --**
14 **the all day meeting that you've described with the**
15 **federal agents and this phone call that you've**
16 **described that you placed to Aaron Hawkins**
17 **three-and-a-half weeks ago or so, have you had any**
18 **other communications with the Federal Bureau of**
19 **Investigation?**

20 A No.

21 **Q Have you had any conversations or**
22 **meetings with any representatives of the United**
23 **States Attorney's Office?**

24 A No.

25 **Q You met Jim May.**

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1 A No.

2 Q Have you met Sheri Lyden (ph.)?

3 A No.

4 Q Have you -- other than the -- the
5 meeting at your house at which a SLED representative
6 mi--- might have been present or --

7 A No.

8 Q -- I don't know if that was at your
9 house -- at your -- or was that the all day meeting?

10 A Right.

11 Q Okay. So other than at the all day
12 meeting that you had with the F.B.I. where a SLED
13 agent was present, have you had any other meetings
14 or discussions with any representative of SLED?

15 A No. I've been more or less staying
16 low in Lugoff. Because I feel like SCANA has
17 wrecked my life.

18 Q Have -- have you testified before a
19 grand jury?

20 A No.

21 Q Has anyone indicated to you -- any
22 representative of the F.B.I. indicated to you that
23 if you did not cooperate with them that -- that you
24 might be in jeopardy?

25 A No.

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1 Q Has anyone offered you immunity to
2 testify --

3 A No.

4 Q -- in any way? Has any government
5 official, whether from F.B.I., SLED, attorney
6 general's office, anyone in any way suggested or
7 threatened that you might be prosecuted in this
8 matter?

9 A No.

10 Q Okay. In your prior deposition, there
11 were a lot of topics you covered, some of which I'm
12 going to revisit today, some of which I'm not. You
13 were Vice President of Nuclear Financial
14 Administration. Is that right?

15 A Uh-huh.

16 Q And you were an officer of SCANA?

17 A Yes.

18 Q And as an officer, you were aware that
19 you owed fiduciary duties to SCANA and to its
20 shareholders. Correct?

21 A Very -- very aware of that. That's
22 why I did what I did.

23 Q What is your understanding of what those
24 fiduciary duties entailed? How would you describe
25 them?

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1 A I had a responsibility for the
2 shareholders for us to be open and honest. And to
3 make them aware of any kind of material
4 information that needed to be shared with them so
5 they could sell and buy shares and know that they
6 had all the material information in front of them.

7 **Q So you believe that if something was not**
8 **in the best interest of the company, you would have**
9 **spoken up and expressed that. Is that fair to say?**

10 A That's what I was pushing for them to
11 do about the project.

12 **Q Now, you testified in your prior**
13 **deposition that you resigned from SCANA because in**
14 **your words, you weren't going to lie, closed quote.**
15 **That was a quote. You weren't going to lie for the**
16 **company. Is that accurate?**

17 A That's correct.

18 **Q And you resigned in 2016. Is that**
19 **right?**

20 A I think it was in January of 2017
21 actually.

22 **Q Okay.**

23 A No. It was '16 -- January of '16.

24 **Q Okay. One of the things that, as I**
25 **understand it, that you testified, was that you felt**

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1 **pressured to lie about involved the estimate of**
2 **completion cost that was included in the March 2015**
3 **P.S.C. Update Petition. Is that right?**

4 A No. It wasn't in March of 215. It
5 was in June of 2015. And I didn't feel like I was
6 lying in the June of 2015. I wasn't comfortable
7 with the number in June of 2015. But what -- when
8 I said I wasn't going to lie, is when at the end
9 of the -- toward the end of the summer of '15,
10 Kevin Marsh and Jimmy Addison and Steve Byrne were
11 negotiating with Westinghouse and Stevie and I for
12 a fixed contract price. And when they came out
13 after hour--- or days and all through the weekend
14 of us working through all kinds of analysis and
15 what he came out with -- Kevin came out with the
16 terms of that fixed price contract. I knew that
17 it was not in the best interest of the rate
18 payers. It was only in the best interest of SCANA
19 being able to make earnings gross -- growth and
20 bonuses. And that's when I had drawn the line and
21 I told Jimmy Addison in November over the phone
22 that I would not lie for the company. And six
23 weeks later they showed me the front door. And
24 they put me out on what they called a special
25 medical leave.

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1 Q Okay. I want to make sure that I got
2 this right. So you're not contending that SCE&G's
3 use of the 1.15 performance factor to -- that was
4 included in the filings in March of 2015, was
5 somehow dishonest?

6 A I'm not familiar with what you're
7 talking about.

8 Q Okay. As I had understood your
9 testimony in your prior deposition -- and maybe I --
10 maybe I just misunderstood. But I thought that you
11 indicated that the company should not have used an
12 estimate at completion cost in its 2015 filings that
13 were based on projected performance factors as
14 opposed to historically achieved performance
15 factors. Did -- did I get that wrong?

16 A But it wasn't March of 2015. Because
17 my husband got sick in May of 2015. When I came
18 back to work, it would have been in June. So we
19 would have had a hearing sometime in late June or
20 July of '15.

21 Q We may be -- we may just be
22 miscommunicating a little bit. And I -- I take
23 responsibility for that. What I was talking about
24 was -- and I understand the testimony followed the
25 petition. But there was a petition filed in March

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1 of 2015 for updates and revisions to the capital
2 cost schedule -- the construction schedule -- what
3 was the last dep---

4 MR. COX: Four was -- we ended with --

5 Mr. Balser: This is fine. So let's
6 mark this as exhibit 5. I'll pass this out to your
7 colleagues there.

8 (Exhibit number 5
9 marked for identification.)

10 (Off-the-record discussion.)

11 By Mr. Balser:

12 Q Ms. Walker, you have been handed what
13 we've marked as exhibit 5. And this is a petition
14 that was filed by South Carolina Electric and Gas
15 for updates and revisions to schedules related to
16 the construction of the nuclear base load generation
17 facility at Jenkinsonville, South Carolina. And
18 this -- this was filed in March of 2015. And then
19 we -- we'll get to your testimony in that
20 proceeding. But this is the petition that began
21 that -- that proceeding. And if you turn to page 27
22 of exhibit 5, you'll see that this petition was
23 filed on March 12th, 2015. Do you see that?

24 A Oh, okay.

25 MR. MOORE: Page what?

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1 THE DEPONENT: Twenty-seven.

2 Mr. Balser: Twenty-seven.

3 By Mr. Balser:

4 Q So just to orient us --

5 A So then when was the testimony filed?

6 Q The testimony was filed in May. We'll

7 -- I'm going to walk you through --

8 A Okay.

9 Q -- that.

10 A So that was the May -- that's when
11 they filed -- yeah, they wrote and filed my
12 testimony while I was not at work.

13 Q I -- I know you testified about that.
14 And we'll - we'll look at some of the documents
15 related to that in a minute. But I just wanted to
16 orient --

17 A Okay.

18 Q I want orient you on the timeline
19 because I know it's been a long time ago.

20 A Oh.

21 Q And I know some of these things kind of
22 blur together. But -- and so exhibit 5, you would
23 agree with me is a petition that was filed in March
24 of 2015 that began the proceeding in which pre-filed
25 testimony was later filed.

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1 A Yeah.

2 Q Okay. So then as you point out
3 testimony wa--- pre-filed testimony was filed in
4 that proceeding and it was filed in May. You're
5 correct about that. And --

6 A Uh-huh.

7 Q And we'll -- we'll look through some of
8 the history of that. Now, here -- here's what I'm
9 trying to get at. And maybe -- maybe it's easier to
10 do this by looking at your testimony and we can do
11 that too, if -- if it makes it easier. As I had
12 understood your prior testimony, what -- what I
13 thought you were complaining about was -- well, one
14 of the things I thought you were complaining about
15 was that the company, when it made the presentation
16 to the Public Service Commission in 2015 --

17 A Uh-huh.

18 Q -- asked for revisions and updates that
19 were based on performance factors and worker
20 efficiency that Westinghouse was projecting to be
21 more efficient than they had actually accomplished.

22 A That's probably correct.

23 Q Okay. Is that -- is that -- did I --
24 I'm just trying -- I'm not --

25 A That sounds correct.

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1 **Q I'm just trying --**

2 **A And the projection, if it was a 1.15,**
3 **that's ludicrous because I mean, the reality is**
4 **the P.F. from the time I got on the project, was a**
5 **straight line up. And now all off a sud--- and I**
6 **-- I'm talking about, like, 2.84, 2.95, something**
7 **like that. And so they're magically going to get**
8 **to a 1.15? They never in any craft, whether it be**
9 **laying concrete, their steel work, anything,**
10 **nothing was a 1.15. So with the same craft, how**
11 **in the world are you going to take something from**
12 **going straight angle, assuming X and Y axis, how**
13 **are you going to go from a 1.85 or a 2.2 down to a**
14 **1.15? Never in six years has it ever not gone up**
15 **higher. You're going to get to a 1.15? That's**
16 **just unrealistic.**

17 **Q And -- and that's what I'm trying to**
18 **understand. And I'm just trying to -- I'm trying to**
19 **understand what it is that you testified about in**
20 **your prior deposition that you thought was improper**
21 **or inappropriate in connection with the -- the May**
22 **-- March and May 2015 filings. And as I -- as -- as**
23 **I thought I understood it before, you were -- you**
24 **were upset that the company was using Westinghouse's**
25 **projected performance factors as opposed to the**

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1 **historical. Is -- is that right or not -- or -- or**
2 **are were you --**

3 A Yeah. I mean --

4 **Q Okay.**

5 A -- how -- I mean --

6 **Q Okay. So as I understood your testimony**
7 **a minute ago, the -- that -- that isn't what you**
8 **contend the company was lying about. You now --**
9 **what I now understand you to be saying is, there was**
10 **something in connection with the 2015 amendment that**
11 **you thought was inappropriate or improper. And that**
12 **that was what you were saying you weren't going to**
13 **lie to the company about. Is -- is that right? I'm**
14 **just trying to understand what you're saying.**

15 A They -- when -- when we were talking
16 about what to go forward with in this hearing,
17 Kevin Marsh, Jimmy Addison, Marty Phalen, the guy
18 that graduated from high school and lied about
19 going to college, who was an executive senior V.P.
20 Steve Byrne -- Kevin, Jimmy, Steve, Marty Phalen
21 -- I guess it was those four -- Jeff Archie would
22 be in there sometimes, but not always because he
23 -- he was an idiot. But anyway, so you had those
24 four in there. And we kept showing them what the
25 team from nuclear had projected the estimate at

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1 completion to be. And we thought using historical
2 actual data, you know, the curve line that goes
3 straight between the X and Y axis, we were
4 projecting it to be something like 1.2 billion.
5 And Kevin kept saying well, I've got a number from
6 Westinghouse and they say it's going to be just
7 under seven-hundred million. And we kept telling
8 them why we thought the historical made more sense
9 than whatever you were getting from Westinghouse.
10 We didn't know what the basis was. And I think,
11 maybe -- maybe it was based on some PI, you know,
12 performance factor. But Kevin kept going back and
13 saying well, I've got something that backs up this
14 687,000,000 -- is the number that keeps coming
15 back to me. And then, you know, we'd meet -- we
16 met like four times between January and April.
17 And every time I kept bringing up the team's
18 number that Ken led in making these calculations.
19 He showed me the calculation. It all -- I went
20 over there. They were in -- they were sequestered
21 in a separate building for like two months just
22 making that calculation. I got involved with it.
23 I made -- it made perfect sense what he was doing.
24 And so I -- I kept bringing it up. I was like,
25 well, you know, this is what we did. This is how

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1 Ken made the calculation. And Kevin at the end,
2 our number was off the agenda that -- ev---
3 everybody agreed from the business team that there
4 was a meeting held. Every day we met it felt like
5 we were coming in after another meeting had been
6 held the night before and a decision had been
7 made. And our numbers just kept being shoved to
8 the side. And then, finally the last meeting we
9 had, our number was off the agenda. And so the
10 night before I was going to have that meeting, I
11 went to Jimmy Addison's office. I gave him a
12 file. I made a duplicate copy of it and I
13 explained to Jimmy Addison. I said, Jimmy, I
14 said, this is what your team came up with as the
15 estimate at completion. Let me show you why we
16 think this is the right number. I walked him
17 through the whole calculation. At the end of the
18 calculation, he looked at me. He said Carlette,
19 he said, I understand where you're coming from and
20 I used to think that was right. But they've
21 convinced me that the W.E.C. number is the way we
22 need to go. And I said, so be it. I said, just
23 wanted you to know exactly why we calculated the
24 way we did. And I left that file with him. It
25 was in a red folder. I had a yellow copy of

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1 exactly what I gave him. And I put it in my safe
2 in -- at home. I said, I'll be damned, I know
3 exactly what I gave that man. And he's the C.F.O.
4 of this company. And by giving it to him, I've
5 done my duty.

6 **Q And when you --**

7 A So at --

8 **Q When you say the W.E.C. number, you mean**
9 **the Westinghouse number?**

10 A The Westinghouse number. So when we
11 went in the meeting the next morning, my number
12 and my team's number wasn't on there. I couldn't
13 bring it up. Like Jimmy had told me the night
14 before. He said, but I want you to bring it up
15 and discuss it. Well, it was off the agenda. And
16 the only thing that was on there was a column with
17 Westinghouse at the top of it, 687,000,000
18 dollars. And Kevin said, I've got something from
19 Westinghouse that supports that number. And
20 that's the number we're going to go with. And I
21 was like, there you go. The C.E.O. made the
22 decision.

23 **Q And --**

24 A And I can't tell you that that number
25 was perfectly wrong. He just chose that number

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1 because he had something to back it up. I have
2 some -- a num--- a different number. I can back
3 it up. I don't know why he chose that number and
4 not my number. But he chose that one. I didn't
5 feel good about it, but I can't say that it was --
6 I didn't know at that point that it was -- that he
7 was a bad guy. I had worked with that man for 28
8 years. I trusted him. I thought he was a good
9 man. I was just a -- a idiot for believing him.
10 At some point, he turned and ended up being
11 nothing but a lying slob.

12 **Q** **So -- so --**

13 A But at this point, I still trusted
14 him.

15 **Q** **All right. So let me -- let me try to**
16 **break this down. As I understand it, the**
17 **calculations that you're talking about that your**
18 **team did or the team working under you did, assumed**
19 **a -- took the estimate of completion figures that**
20 **Westinghouse provided in August of 2014 and ran**
21 **calculations assuming that the historical**
22 **performance factor --**

23 A No. It didn't --

24 **Q** **-- that had been achieved --**

25 A It took nothing from Westinghouse. It

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1 went to the ground. I mean, it went all the way
2 back to the original budget. And it said, okay,
3 if you've had this number of hours to do concrete
4 and we know that this point you've only done this
5 amount of it, that means you got this much left.
6 And this is the average hourly rate for the
7 concrete work. And if you multiply that out and
8 you do the markups, you do the benefits and then
9 you calculate out how much you got left to do.
10 And this is the efficiency factor for concrete
11 work. And so by the time we finished, it ends up
12 being a big number because they're so inefficient.

13 **Q** You just -- the -- the -- the work that
14 **was done by the team that you just described, used**
15 **historical performance factors as the basis for the**
16 **mathematical calculations?**

17 A Exactly.

18 **Q** Okay.

19 A Because they've proven they can't do
20 anything other than -- I mean, history shows --
21 let's just -- if you got a blank sheet of paper --
22 I mean, here's your X axis, here's your Y axis and
23 the performance factor was a straight line like
24 this. And if you've never seen it not one time
25 drop down, why would you ever believe that they

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1 could operate like that?

2 **Q Are --**

3 A This is years. Six years it's never
4 -- and this is the performance factor -- here's --
5 one is right here. And I mean, on some of their
6 things, this would be like 1.84. And that's where
7 we are. You're six. And that's just one thing.
8 On concrete, they were like 5.7. And they had to
9 put -- that was the biggest commodity they had to
10 put down in that project. There were five times
11 -- almost six times on a cubic yard of concrete.
12 They had millions of yards of concrete to lay.
13 And it took them six times the amount of time to
14 lay one yard of concrete.

15 **Q Do you know whether the team that did**
16 **the calculations that came up with the roughly 1.2**
17 **billion dollar -- or 1.3 billion dollar figure used**
18 **a con--- a blended 1.4 historical performance rate**
19 **or did they use individual historical performance**
20 **rates for each of the separate crafts? Or do --**

21 A I can't --

22 **Q -- you know.**

23 A -- remember now.

24 **Q Okay. But you do know that the -- the**
25 **-- the -- the basis for the difference between the**

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1 number that you indicated Mr. Marsh selected, as
2 opposed to what the number was that was produced by
3 the financial team working under you, was the
4 different assumption made by your team as to what
5 the performance factors were going to be going
6 forward?

7 A I believe that's the case.

8 Q Okay. So let -- let's go back to this
9 timeline around preparation and filing of your
10 testimony in 2015. I want to show you an email. I
11 think you just referred to this in your testimony a
12 minute ago.

13 Mr. Balser: I want to make as exhibit
14 number 6, an email from Mr. Kissam to you. I'm
15 sorry, from you to Mr. Kissam.

16 (Exhibit number 6
17 marked for identification.)

18 THE DEPONENT: Do I get a copy of it.

19 Mr. Balser: Yes, ma'am. The court
20 reporter --

21 THE DEPONENT: Oh.

22 Mr. Balser: -- is going to provide it
23 to you. Ms. Walker, you've been handed what we've
24 marked as exhibit number 6, which is an email dated
25 March 3rd, 2015 from you to Mr. Kissam.

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1 By Mr. Balser:

2 Q Do you recognize this email?

3 A November 6th. I don't remember it,
4 but I mean, it looks like something I could have
5 written.

6 Q Okay. So this -- this is an email
7 that's dated March 3rd, 2015. And it says, are you
8 invited to the Monday morning meeting to discuss the
9 facts and decide on the P.S.C. project filing
10 strategy? Is the P.S.C. project filing strategy the
11 -- the petition that we just looked at that we
12 marked as exhibit number 5?

13 A I would expect so.

14 Q Okay. You say, just wondering, it
15 appears I'm on a different page from all senior
16 staff. Byron Chad Belton, it should be a lot of
17 B.S. flying during the meeting. Jimmy and I met
18 last week and I explained my position. And he said
19 he was where I was, but then they convinced that the
20 other position makes more sense. Is that -- is that
21 meeting that -- with Jimmy Addison the meeting that
22 you just described?

23 A Yeah.

24 Q Okay. And then he said, he told me he
25 wants me to voice my concerns/opinions. You see

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1 **that?**

2 A Yeah, that's exactly what I just said.

3 **Q And so Mr. Addison told you to voice**
4 **your concerns and then you say, right, how do you**
5 **spell suicide?**

6 A Yeah.

7 **Q What -- what do you mean by that?**
8 **Explain that.**

9 A Because it's -- I mean, I knew I was
10 already pushing against the wall. And I was -- I
11 felt like they were already attacking me because I
12 wasn't going along with the -- the good old boys.

13 **Q And --**

14 A That I was obviously standing out.
15 And I felt like I was being reprimanded every time
16 I turned around for something that I couldn't put
17 my fingers on yet.

18 **Q And your specific concern at that time**
19 **was about using an E.A.C. calculation based on a**
20 **productivity factor of 1.15, as opposed to**
21 **historical performance factors. Right? Isn't that**
22 **the gist of it?**

23 A Of them using the 1.15?

24 **Q Yeah. I mean, that's what you were**
25 **saying that you were -- that was what your -- when**

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1 you said I'm on a different page. The different
2 page was you thought historical performance factors
3 ought to be used. And you understood that the rest
4 of the team was saying we're going to go with
5 Westinghouse's --

6 A The rest of the senior --

7 Q -- projected --

8 A -- executives and the two lawyers.

9 Yeah.

10 Q 1.15?

11 A Yeah.

12 Q Okay. Are you familiar with an
13 organization called the South Carolina Office of
14 Regulatory Staff?

15 A Yes.

16 Q What -- and -- and if I refer to the
17 Office of Regulatory Staff as O.R.S., will you --

18 A Yeah. I know what it is.

19 Q -- understand what I mean?

20 A Uh-huh.

21 Q Okay. I know you're -- I'm newer to
22 this than you, so bear with me. What was the
23 O.R.S.'s role in the -- with respect to the project?

24 A Well, they had --

25 MR. COX: Object to the form.

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1 Mr. Balser: You can answer.

2 By Mr. Balser:

3 **Q When I say the project, I mean, the**
4 **development of units two and three at Jenkinsville.**
5 **What was O.R.S.'s role with respect to that project?**

6 A They were there to do oversight and to
7 report back. And be a witness at the Public
8 Service Commission as far as the prudence of the
9 project's proceeding.

10 **Q Can you tell us what individuals from**
11 **O.R.S. were involved in overseeing the project?**

12 A Anthony James, Gary Jones was an
13 engineering consultant. Gene Soult, Cindy -- I
14 can't remember Cindy's last name. Jay Jah-Shinsky
15 had a financial audit role. And I know he had a
16 guy named Henry. He passed away, but Henry was
17 out there doing financial audits. And I don't
18 know who replaced Henry. I can't remember now.
19 And then there was a guy -- what is that guy's
20 name -- and I can't remember this other -- one of
21 the guys that was -- would come out there.

22 **Q Did -- did the Office of Regulatory**
23 **staff have a physical presence at the site?**

24 A They had their own assigned trailer
25 where they worked out of. And it was actually not

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1 over at the two/three site, but it was at -- it
2 was about, maybe a mile away from the site at the
3 old training center where we used to be at. We
4 were there for, like, maybe the first two years
5 when I was at the project before they built the
6 administrative building over at the new site.

7 **Q And which employees were -- spent time**
8 **-- was anybody permanently assigned to the site from**
9 **O.R.S. to the best of your recollection?**

10 A No. I don't think anybody was.

11 **Q Who do you remember -- were all -- were**
12 **some combination of all the people that you**
13 **mentioned, Mr. James, Mr. Jones, Mr. Soult, Cindy,**
14 **Joe, et cetera, on site at various time?**

15 A They -- they came out there, I think
16 monthly to read and then Gary Jones came out there
17 quarterly. Because he was from Chicago. So he
18 came out quarterly. And they would go on site
19 tours with Skip Smith, the manager -- the nuclear
20 manager -- business manager, would take them on
21 quarterly tours. And then they would -- there
22 were binders over there that would be filled with
23 materials that they would read.

24 **Q Were you aware that South Carolina**
25 **Electric and Gas was required to provide documents**

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1 **to the O.R.S. through something called the E-room?**

2 A Yeah.

3 **Q What -- what is -- do you know what the**
4 **E-room is?**

5 A It's an electronic room -- or an
6 electronic, I guess database where certain
7 information was uploaded and they could access it.

8 **Q Do you know what kinds of information**
9 **was uploaded into this electronic reading room?**

10 A No. I didn't keep up with that.
11 Somebody under me worked to take care of that.

12 **Q Do you know whether the O.R.S. regularly**
13 **received project review meeting minutes in the**
14 **E-room?**

15 A I don't know what was in the E-room.

16 **Q Aside from the E-room, were you aware**
17 **that O.R.S. had access to monthly project review**
18 **meeting minutes?**

19 A I don't know what -- we had tons of
20 notebooks over there. And we had a designated
21 little team that put things in the notebooks and
22 put it in the E-room. And what all was put over
23 there, I -- I don't know.

24 **Q Okay. Did you ever yourself -- was it**
25 **part of your job duties or description to review**

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1 **project -- a monthly project meeting minutes? Is**
2 **that something you did?**

3 A No.

4 **Q Okay.**

5 A Our company made the conscious
6 decision, for some reason not to ha--- have
7 minutes to the project meeting.

8 **Q Well, you know that there were monthly**
9 **project review meetings at which minutes were taken.**
10 **Do you --**

11 A Oh, absolutely. Westinghouse did
12 them.

13 **Q Westinghouse -- Westinghouse created the**
14 **project review meeting minutes each month?**

15 A Yeah.

16 **Q Okay.**

17 MR. COX: What is this, number 7?

18 (Exhibit number 7
19 marked for identification.)

20 Mr. Balser: Ms. Walker, you've been
21 handed what we've marked as exhibit number 7. And
22 this is just an email string from the -- from July
23 15th through 17th, 2015 time frame. There is a -- an
24 email from Abney A. Smith, Junior.

25 By Mr. Balser:

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1 Q **Is that Skip Smith?**

2 A Uh-huh.

3 Q **And that's to Cynthia Lanier. Who's**
4 **Cynthia Lanier?**

5 A She's one of the employees that was on
6 my team at nuclear.

7 Q **What did she do? What was her job duty?**

8 A She was responsible for getting all of
9 the material together to put in the binders for
10 the O.R.S.

11 Q **And Shirley Johnson is copied.**

12 A She was --

13 Q **And who's Ms. Johnson?**

14 A She was the manager of one of my
15 teams.

16 Q **So then the -- the first email is from**
17 **Skip Smith to Cynthia, copy to Shirley that said --**
18 **the subject is inventory of confidential information**
19 **provided to O.R.S. And there's an attached Excel**
20 **spreadsheet and -- and the message is updated. Then**
21 **the -- that was at 3:04 p.m. At 3:10 p.m., Skip**
22 **Smith sends an email to Ron Jones and you with**
23 **copies to Mitch Willoughby, Chad Burgess and Shirley**
24 **Johnson that says, attached is a list of information**
25 **we routinely give to O.R.S. confidentially for their**

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1 review. Several reports include module information.

2 Do you see that?

3 A Uh-huh.

4 Q And then, I guess, maybe -- and then it
5 looks like additional folks were copied on a email
6 the next morning from Ron Jones, you -- to you, Mr.
7 Byrne, Mr. Marsh, Mr. Zeigler, Mr. Willoughby, Mr.
8 Hinson and Mr. Burgess. And then you sent an email
9 to Alice Fox saying hey, Alice, can you print this
10 listing for each of the witnesses to have in their
11 notebooks for next week. I will walk around to your
12 office and get them when there's a break in the
13 technical discussions we're in right now. Thank
14 you. Do you see that?

15 A Uh-huh.

16 Q Who is Alice Fox?

17 A She's somebody that works in the rates
18 and regulator -- regulations department.

19 Q And if we look at the attachment to
20 exhibit number 7, which is an Excel spreadsheet. I
21 don't want to go through chapter and verse, but if
22 you -- I did want to just direct your attention to
23 about halfway down the first page. There's a
24 reference to monthly project status meeting minutes
25 consortium and SCE&G with a reference that those are

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1 **in notebook L. That they're updated monthly. That**
2 **the source is Adam Hoey and Skip Smith. Do you see**
3 **that?**

4 A Uh-huh.

5 Q **Does this indicate that among the**
6 **documents that SCE&G provided on a confidential**
7 **basis to O.R.S. were monthly project status minute**
8 **meetings?**

9 A Yeah.

10 Q **Do you have any reason to believe O.R.S.**
11 **did not have access to monthly project status**
12 **meeting minutes provided by SCE&G?**

13 MR. COX: Object to the form.

14 THE DEPONENT: Adam Hoey -- Adam Hoey
15 began taking minutes after we employed him.

16 By Mr. Balser:

17 Q **Adam Hoey was a SCE&G employee?**

18 A The SCANA Services employees.

19 Q **SCANA Services. But a -- my question is**
20 **a little different. You don't have any reason to**
21 **believe that the O.R.S. did not have access to the**
22 **monthly project status meeting minutes as reflected**
23 **on the Excel spreadsheet attached to exhibit 7?**

24 A I don't doubt that it -- for a minute.

25 Q Okay.

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1 A Adam did begin those -- well, once we
2 hired him, we -- he sat in the monthly project
3 review meeting and we began taking minutes. But
4 that was late in the project.

5 **Q And before Adam began creating minutes,**
6 **Westinghouse did create minutes of each of those**
7 **monthly project meetings. Correct?**

8 A That's correct. And no one at SCE&G
9 took any, which I thought was flawed. And that's
10 why we took it upon ourselves to have Adam sit in
11 the meeting and take minutes. But I only had so
12 many people. So it had to be -- it was six years
13 before we could get somebody to be able to sit in
14 and do that.

15 **Q Okay. We've been going about an hour.**
16 **How are you doing? Are you okay? Do you want to**
17 **take a short break or are you all right?**

18 A If y'all want to take a -- maybe a
19 five minute bathroom break, that'd be nice.

20 **Q Okay. Let's do that.**

21 A Okay.

22 VIDEO TECHNICIAN: Off the record at
23 11:17 a.m. On the record at 11:32 a.m.

24 By Mr. Balser:

25 **Q Okay. Ms. Walker, we're back on the**

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1 **record.**

2 A Okay.

3 Q **This team that you had working for you**
4 **that was doing the review analysis that we talked**
5 **about a little while ago.**

6 A Uh-huh.

7 Q **Who -- who chartered that project? And**
8 **when I say that, I mean, who -- whose idea was it to**
9 **-- to do the -- the review of the type that your**
10 **team was doing?**

11 A I was actually given that charter. I
12 can't remember if it was Steve Byrne. I think it
13 was Steve Byrne that asked me to develop a budget
14 for the project. And I originally was working
15 with someone from Westinghouse. His name was
16 Dwayne something. And Dwayne was relatively new
17 with Westinghouse. I think he had been with
18 Westinghouse at some point and then had been gone
19 for quite a few years. And then had come back to
20 Westinghouse. And anyway, Dwayne tried hard. But
21 that ended up being just a dead end. And so as
22 time went on, what we found was we began to be
23 pressed to figure out where the project was going.
24 And it was -- become abundantly clear to everybody
25 that between -- between the performance that was

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1 happening in front of us, between the actual
2 construction of the prefabricated parts, which
3 were supposed to be made in Lake Charles,
4 Louisiana. That as well as the issues that were
5 -- they were having on site with the concrete --
6 the actual consistency and the formulas that they
7 were needing to be able to come up with to be able
8 to meet the N.R.C. codes or what have you. It was
9 obvious that the project was starting to go south.
10 And so we were beginning to see the need to be
11 able to develop our own estimate at completion.
12 So instead of coming up with a budget, we kind of
13 just morphed into coming up with an estimate at
14 completion. And so that was really -- came from
15 the senior executive level, but not to develop an
16 E.A.C. per se, but more an overdraft -- and
17 overlay budget that morphed into an E.A.C.

18 **Q Got it. When did -- when did the**
19 **charter, if you will, get issued? It -- in other**
20 **words, when -- when did the work begin with respect**
21 **to budgeting, which then kind of morphed into a -- a**
22 **-- an overlay of the E.A.C.?**

23 A So let's see. That was the -- I know
24 we worked on it for probably about four months.
25 And so we were finished in January of '15. And we

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1 were -- and close to being finished in January of
2 '15. So we started in probably the -- I would say
3 fall of '14.

4 **Q** And -- and -- and do you recall whether
5 the -- the catalyst to initiate that work was a new
6 E.A.C. that was provided by Westinghouse to the
7 company in August of 2014?

8 A I don't know when they got that new
9 A--- E.A.C.

10 **Q** Okay.

11 A That was provided to Kevin Marsh. And
12 so I don't know when he got that E.A.C.

13 **Q** Okay. Who on your team -- who -- who
14 selected the -- the folks who were going to work on
15 this project?

16 A I did.

17 **Q** Okay. And who did you select and with
18 respect to each of the person you selec--- you
19 selected to -- to participate, can you tell me why
20 you chose that particular person?

21 A Sure.

22 **Q** Okay.

23 A I talked with Skip Smith. He was the
24 business manager. And just so you'll kind of see
25 how the organization was structured, my team -- I

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1 was from SCANA Services. And so I had a team that
2 had three managers. I had a manager for, kind of
3 like, an audit function or a -- a compliance
4 function for the contract. She was Shirley Smith
5 -- Shirley Johnson.

6 Then I had a -- a manager for
7 reporting, that was Kevin Kochems. He was highly
8 technical with the computer and being able to pull
9 things out of the system and reorganize it and do
10 -- I -- that contract was written and so it was
11 real challenging. You had current day dollars,
12 but the -- the contract itself was based on 2007
13 dollars. So you had to use today dollars, but
14 then you had to go back and present value it back
15 to 2007 base dollars. And so it was -- it was a
16 challenging contract to work with. So I needed
17 somebody that had pretty strong Excel skills and
18 also understood finance. So that was Kevin
19 Kochem's role.

20 And then I had another manager whose
21 role was internal controls as it relates to
22 processing invoices. Making sure that the
23 invoices had controls around them to be able to do
24 like processing and make sure that, you know, we
25 didn't have invoices that -- or individuals that

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1 didn't have excessive hours. You know, during a
2 pay period or you didn't have reimbursements for
3 expenses that were outside of boundaries. You
4 know, we had all kinds of different controls in
5 place. And we had probably three people that
6 worked on her team. And they also did the
7 financial information for corporate. You know,
8 doing journal entries and close out and stuff like
9 that.

10 So then, there was another team that
11 was nuclear employees. And so Skip Smith was a
12 general manager and he reported to -- within the
13 nuclear organization. And so he reported to Ron
14 Jones, who was the V.P. of nuclear construction.
15 See, I reported to the C.F.O. of SCANA. So Skip
16 had responsibility to Ron Jones. Skip had
17 approval authority to be able to have the system
18 cut a check to pay an invoice to C.B. and I or to
19 Westinghouse. I didn't have that authority.

20 My authority to pay for something was
21 to be able to approve an expense report for an
22 employee that reported to me or a credit card that
23 was somebody that reported to me. That was the
24 extent that I could approve something. So if
25 somebody were to send in a billion dollar invoice

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1 from Westinghouse, I had no approval authority.
2 You know, I could, you know, give somebody a hard
3 time about it, but Skip could have it paid. And
4 Ron Jones, the V.P. of Construction had the
5 authority to pay to approve an invoice for the
6 system to pay it.

7 So Skip had two people that reported
8 to him. He had a clerk and then he had a -- Ken
9 Brown, who was a senior engineer. Ken is probably
10 one of the brightest persons I've ever worked
11 with. And he -- he -- he knew how to translate
12 the engineering that was in the field into the
13 invoice and the process that we -- we were using.
14 So he was an -- and we couldn't put a value on how
15 important he was to be able to use him with my
16 team, who didn't have any engineering skills. So
17 he translated lots of information for us to be
18 able to comprehend what was in the invoice and
19 also what we would see or hear about.

20 So I talked to Skip very early on.
21 Skip and I, kind of were, if you saw Skip, a lot
22 times you'd see me. Or if you saw Ken, a lot of
23 times you'd see me. Because I had to learn a lot
24 about construction because that's not my
25 background. My background was utility. And as a

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1 C.P.A., it was a lot of accounting and finance,
2 auditing and then before I came into -- before I
3 came to construction, I actually was a corporate
4 compliance officer for four years. So, you know,
5 I had nothing in the way of construction.

6 Q Who quarterbacked that project? Was it
7 you or was it Skip or -- and when I say that
8 project, I mean, this review process that -- that
9 led to a -- a budget slash like a E.A.C. overlay.
10 Who -- who -- who was -- who ran that day-to-day --
11 that effort?

12 A What do you mean?

13 Q On your team. So you -- you've got this
14 -- you -- you got these team members that you're
15 assembling to do this review. And my question is,
16 like, who -- who is -- who is running that -- that
17 work stream? Was that --

18 A And that's what --

19 Q -- you?

20 A -- I'm getting ready to tell you.

21 Q Okay.

22 A I --

23 Q Sorry. Go ahead.

24 A Yeah. So I assembled a team and I
25 asked Skip if we could have Ken lead the effort.

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1 Ken knew the contract. He knew the engineering
2 side of it and he knew the finance part of it. So
3 he would be the perfect person. And then I could
4 give him Kevin who could be the system guy that
5 could do the Excel spreadsheets to be able to
6 create all of the cash flows necessary. And then
7 I also could give him one of my senior accountants
8 that was really adapt at Excel as well. So I gave
9 him Megan Waits who was an excellent worker. And
10 then, I also could make him available to have one
11 of my other mangers, Sherry, when she wasn't in
12 closeout. So those were the players. And then I
13 also gave him Margaret. She's an outstanding
14 employee with a great work ethic.

15 So I gave him a team and they even
16 were in a different building so that they wouldn't
17 be interacting with us asking questions and going
18 to meetings and stuff like that. It was like go
19 over there to that separate building and work to
20 come up with a plan on how to come up with an
21 E.A.C. and actually put it in place and calculate
22 it. And they worked on it for probably about six
23 weeks to two months getting all the background
24 information, all the estimates, you know, average
25 annual -- or average hourly rates. All of that

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1 documented, create all the spreadsheets and inter
2 linkings. And then come up with an ending
3 product.

4 And while they were working on that, I
5 would go between what my job was and all the
6 freaking meetings that we had, and then I would go
7 over to their building so that I could stay in
8 touch with what they were doing and how they were
9 going about it so that I could be a spokesperson
10 as to where we were and what we were -- kind of
11 some of the assumptions that were going into that
12 calculation. And so at the end, I was in
13 agreement with the underlying assumptions that
14 went into that E.A.C.

15 **Q And that -- and that's what I was going**
16 **to -- you anticipated my next question. Which is,**
17 **do you recall -- was there ever a discussion among**
18 **this team that you assembled and -- and -- and you**
19 **about what assumptions to make about productivity**
20 **factors to use for the calculation?**

21 A Yeah.

22 **Q All right. Tell -- tell me what you**
23 **remember about those discussions and how you landed**
24 **on using the historical as opposed to some other**
25 **number.**

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1 A Well, I mean, I -- I -- I don't
2 remember the discussion other than what I just
3 shared with you on that sheet of paper.

4 **Q Okay.**

5 A I mean, I -- if you asked me to come
6 up with something again and you told me anything
7 other than to follow the history, I mean, I
8 couldn't do -- I couldn't rationalize anything
9 other than at a minimum, the average of the
10 history.

11 **Q Okay.**

12 A You couldn't -- for me as a rational
13 person, to do anything other than to look back at
14 the history of where that project has been and
15 pick something arbitrary other than something
16 along that line, would be -- to me would be
17 misguided.

18 **Q Was there any -- was there any**
19 **discussion that you recall about -- it -- did your**
20 **team -- let me -- strike that. Let me ask -- ask**
21 **this question. Did you -- was your team aware at**
22 **the time it was doing its work, that Westinghouse**
23 **had projected an improved performance factor of**
24 **1.15? Did you guys know that?**

25 A No. I don't think so. But if they

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1 would have told us they had that as a projection,
2 we would have laughed.

3 **Q Okay. And --**

4 A We would have said that was just
5 absolutely -- and I won't cuss about it -- we
6 would have said that was absolutely ludicrous.

7 **Q Okay. And was there any discussion that**
8 **you recall among your team members about the fact**
9 **that there could be lessons learned in -- from unit**
10 **two that could be applied to unit three. Such as**
11 **the craft work, we're getting more efficient, for**
12 **example, in the construction of unit three?**

13 A Based on what they were doing, they
14 were getting less efficient the more they did it.

15 **Q Okay. Do you -- do you recall any**
16 **discussion about other potential performance factors**
17 **to use other than historical? Or did you just say**
18 **let's go with historical. That seems to make the**
19 **most sense and we're going to calculate it that way?**

20 A There was nothing at that project.
21 Nothing that was good. Everything was getting
22 worse. I mean, all we ever heard was more
23 failures and more problems. And I mean, the last
24 thing I remember hearing was that all of the steel
25 that was -- that had been fabricated warped and

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1 had been re-cleaned up on site that was all under
2 tents. I mean, it was like a tent city. That
3 there was all question about the original -- the
4 origin of the steel was all in question. So that
5 made it to where everything on that site was
6 likely bad and was going to have be rectified with
7 new because it was not tracked according to the
8 N.R.C. regs. And it was like when I heard that,
9 it was just like, go figure. I mean, this is just
10 like a debacle on top of a debacle.

11 **Q So as I understand it then, your team**
12 **was working in a separate building. They were**
13 **coming up with their own calculation. They weren't**
14 **told about what Westinghouse's projection of**
15 **performance factor was. I understand your testimony**
16 **that you would have rejected it had you known. And**
17 **then what was the -- the -- was there a -- an end**
18 **product that your team created? What was the --**

19 A Yeah.

20 **Q -- a deliverable? What -- what -- what**
21 **was it? What -- what -- what did the team come up**
22 **with? What did it look like?**

23 A It was a simple spreadsheet that came
24 down and it showed you the different elements. I
25 can't remember off the top of my head. And it had

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1 a number at the bottom that had a double lines.
2 And it said that E.A.C. for units two and three.
3 And it was -- and I think it was like 1.2 billion
4 dollars.

5 **Q Let me ask you this. You -- you -- you**
6 **testified that this project started as a budget**
7 **project and that kind of morphed into E.A.C.**
8 **Explain how it morphed. I mean, what -- how did**
9 **that --**

10 A I can't --

11 **Q -- how did that happen?**

12 A I can't remember how. It just -- it
13 was a transition. You know, you couldn't get the
14 budget straight because this Dwayne guy didn't
15 know, you know, what he was doing. And he was
16 trying to figure it out and he was trying to work
17 with this woman named Joanne Hyde. And she was
18 kind of high strung, but she -- she knew the
19 system. But she wouldn't share it with him. I
20 don't know if they were compet--- there was some
21 competition between the two of them. But he would
22 try to help you, but he didn't know what he was
23 doing. And so it -- I didn't even know where he
24 went. All of a sudden he was just kind of gone
25 and it was like -- I -- I don't know what happened

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1 with him. But he was trying to give us the data
2 we wanted in the billings in the format we wanted
3 so that we could, you know, work with their
4 billings in a more accurate easy way. And so that
5 was going to help us in being able to develop
6 budgets and stuff. And -- and we did the same
7 thing with C.B&I. or Shaw. And it's like you
8 could never get them to do things in a format that
9 was reasonable. And it was -- I'm pretty sure it
10 was on purpose so that you wouldn't -- couldn't
11 get a handle on where everything was.

12 So we ended up having to have somebody
13 from our I.S.T. Department come out and format a
14 huge database that could take their data in like
15 tremendous volumes and reorganize so that we could
16 test their data. Because they wouldn't give it to
17 us in a format that you could use anybody's system
18 to actually read it. I mean, it would come to us
19 in these big blobs. And it's like well, why can't
20 you give it to us in lines, organized like this.
21 And they'd say, oh, you know, our system won't do
22 that. And it's -- I mean, everything was always
23 such an excuse. So when -- if you asked them to
24 give you budget next to their actuals, they
25 couldn't do that. So I mean, it was -- everything

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1 was always a problem on that project.

2 Q Did -- did anyone in senior management
3 direct you to have -- to create a team to do the --
4 this E.A.C. calculation or was this something that
5 you thought should be done?

6 A No. Senior man--- senior executives
7 knew we were doing that.

8 Q Did they direct you to do it or did they
9 ju--- or did you --

10 A Steve more or -- yes. Steve wanted an
11 E.A.C. Steve Byrne.

12 Q Okay. What did -- what did -- when did
13 he --

14 A And then Kevin Marsh wanted the E.A.C.

15 Q What -- tell me what you remember about
16 any discussions with either one of those men about
17 creating a calculation of an E.A.C.

18 A I can't remember a lot about the
19 discussion. I know Steve wanted a budget, which
20 is an E.A.C.

21 Q Okay.

22 A I mean, you can take what you spent to
23 date and then the E.A.C. and that's the total
24 budget.

25 Q I promised you we would talk about the

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1 **timeline on creation of your -- your -- and**
2 **presentation of your testimony in connection with**
3 **the May 2015 proceeding. And why don't we -- why**
4 **don't we do that now?**

5 A Okay.

6 Q **Before we go there though, let me ask**
7 **you one question. Did -- do you -- did you ever**
8 **have any discussions or -- strike that. In -- in**
9 **your role in the N.N.D. structure, did you ever**
10 **interact with people from O.R.S.?**

11 A Yeah.

12 Q **Do you ever recall having any**
13 **discussions with any representative of O.R.S. about**
14 **the historical performance factors being achieved on**
15 **the project?**

16 A I'm sure we would have. Because I
17 mean, they would get the -- the monthly packet.
18 So I'm sure we would have talked about it if they
19 would have asked about it.

20 Q **And in the monthly packet you're talking**
21 **about, those are the --**

22 A The slides from the monthly review
23 meeting.

24 Q **And in every one of those slide**
25 **presentations --**

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1 A Decks.

2 Q -- slide decks, there was a calculation
3 of what the performance factor was at that time.
4 **Correct?**

5 A Right. Every month.

6 Q Okay. And the O.R.S. got those.

7 A Uh-huh.

8 Q All right. Let's go to -- to May of --
9 or April -- start in April. We -- we started in --
10 we saw the -- your email to Keller Kissam --

11 A Uh-huh.

12 Q -- which was March 3rd of 2015, as I
13 recall.

14 A Uh-huh.

15 Q Now, that -- that was, of course, that
16 the -- before the petition was filed. The petition
17 that we marked as exhibit 5. So let's start with --
18 let's go to tab 22.

19 Mr. Balser: Should I mark the calendar?
20 You can mark -- let's -- we'll start with that.
21 Then we'll jump around. What number is that?

22 COURT REPORTER: Eight.

23 (Exhibit number 8
24 marked for identification.)

25 By Mr. Balser:

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1 Q Okay. Ms. Walker, what we've tried to
2 do -- and I know it's been a long time for you.
3 What we've tried to is -- is create a -- a timeline.
4 And we -- we've created a little calendar, which
5 I'll show you.

6 A Oh, good. Because they always erased
7 mine.

8 Q That I think -- I think we actually got
9 it from -- from your calendars on the system. But
10 if we --

11 A Really?

12 Q -- if we look at exhibit number 8, this
13 is a calendar invite that was sent to you and others
14 from Karen Scruggs that has a calendar invite for --
15 to discuss your testimony. Do you see that?

16 A Uh-huh.

17 Q And that is sent on April 14th, 2015 for
18 a meeting on April 15? Do you see that?

19 A Uh-huh.

20 Q Who's Karen Scruggs?

21 A She is the legal assistant to -- I
22 think Chad.

23 Q And --

24 A Or, maybe back then she was working
25 for Jimmy. I don't know.

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1 **Q You --**

2 A At one time she was with Jimmy. And
3 Jimmy wasn't happy with her. And then she went to
4 go work for -- I think it was Chad. I don't know.

5 **Q You recognize this as a -- a calendar**
6 **invite that was sent to you and others on April**
7 **14th, 2015?**

8 A I don't remember, but it looks like it
9 did.

10 **Q And you see that the meeting was**
11 **scheduled for April 15th of 2015?**

12 A Uh-huh.

13 **Q Do you -- that's a yes?**

14 A Yes.

15 **Q Do you recall accepting this calendar**
16 **invitation?**

17 A No. I don't know who Benjamin Mustian
18 is.

19 **Q I believe he's an outside law--- I think**
20 **he's a lawyer that works either for Mr. Zeigler or**
21 **Mr. Willoughby. Sorry.**

22 MR. COX: David, has exhibit 8 been
23 produced into litigation yet?

24 Mr. Balser: I think it is being
25 produced. I don't think it was responsive to any

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1 request, but since we're using it, we're going to
2 produce it today. So is that right? Exhibit --
3 what are we now?

4 COURT REPORTER: Nine.

5 (Exhibit number 9
6 marked for identification.)

7 MR. RICHARDSON: We've got to do a
8 better job of asking for things David.

9 By Mr. Balser:

10 Q Do you recognize exhibit 9 as your
11 acceptance of the calendar invite that was sent as
12 exhibit number 8?

13 A That's what it looks like. I don't
14 know who Katrina Thompson is.

15 Q Now, April 14th, which is the day that
16 you received the calendar -- the calendar invitation
17 we just discussed, was approximately six weeks
18 before your actual testimony was filed. Right?

19 A I don't know when my testimony was
20 filed.

21 Q Well, let's look at your test--- let's
22 mark your testimony.

23 (Exhibit number 10
24 marked for identification.)

25 MR. RICHARDSON: I believe I've got

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1 these exhibits in order except for 7. You marking
2 this exhibit 10?

3 Mr. Balser: What page is her pre-filed
4 on?

5 (Off-the-record discussion.)

6 By Mr. Balser:

7 **Q Ms. Walker, you've been handed or you're**
8 **going to be handed what we've marked --**

9 MR. RICHARDSON: Oh, I'm sorry.

10 Mr. Balser: -- as exhibit 10.

11 MR. RICHARDSON: I took it.

12 Mr. Balser: If Mr. Richardson will let
13 go of it.

14 MR. RICHARDSON: I don't get a copy.

15 MS. NOBLES: We've go another one.

16 MR. RICHARDSON: Good. Thank you,
17 Paige.

18 Mr. Balser: It's gonna lighten Paige's
19 load going back home.

20 MS. NOBLES: Thank you, Paige.

21 Mr. Balser: What's the date? Where's
22 the date on this? Huh? Okay.

23 By Mr. Balser:

24 **Q You've been handed exhibit number 10,**
25 **Ms. Walker, which is the transcript of the entire**

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1 **proceeding that occurred in July of 2015. And if**
2 **you turn to page 602, you will see your pre-filed**
3 **testimony.**

4 A Uh-huh.

5 Q **Do you see that?**

6 A Uh-huh.

7 Q **And I thought there was a date on there,**
8 **but there may not be. Do you recognize your**
9 **pre-filed testimony that begins on page 602 of**
10 **exhibit 10?**

11 A I thought I had two financial
12 exhibits.

13 Q **Okay. You're correct, Ms. Walker. We**
14 **have -- we do have those exhibits here.**

15 A Oh.

16 Q **Okay.**

17 A Why -- why aren't they in here?

18 Q **I don't think they -- this is exactly**
19 **what was filed with the commission.**

20 MS. NOBLES: That's the transcripts.

21 Mr. Balser: That's the transcripts.

22 They weren't with the transcript, but your pre-filed
23 testimony did contain the exhibits. So we'll take a
24 look at those.

25 THE DEPONENT: Oh, okay.

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1 Mr. Balser: All right. Are these
2 together -- are these both of them?

3 (Off-the-record discussion.)

4 Mr. Balser: Let's mark that as whatever
5 the next exhibit is. Okay.

6 (Exhibit number 11
7 marked for identification.)

8 THE DEPONENT: So those weren't filed
9 with this?

10 Mr. Balser: They were filed with your
11 pre-filed testimony, but the transcript apparently
12 that the P.S.C. created did not include the exhibits
13 to your pre-filed testimony. This is an exact --
14 we'll represent to you that exhibit 10 is an exact
15 copy --

16 THE DEPONENT: Of the transcript.

17 Mr. Balser: -- of the -- of the Public
18 Service Commission's transcript --

19 THE DEPONENT: Transcript.

20 Mr. Balser: -- of the proceeding.

21 By Mr. Balser:

22 **Q Okay. The -- the exhibits are**
23 **referenced in your testimony and I think in your**
24 **live testimony. But let's look at exhibit number**
25 **11. Is exhibit number 11 the set of exhibits that**

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1 was attached to your pre-filed testimony? And to
2 orient you, Ms. Walker, on dates, I'm just going to
3 represent to you -- and then we'll -- we'll prove it
4 up with you --

5 A Okay.

6 Q -- that your pre-filed testimony was
7 filed on May 26, 2015.

8 A That sounds right.

9 Q Which I know is a date that your husband
10 was in the hospital.

11 A What was the date again, May 26th?

12 Q May 26th, 2015. And we'll talk about
13 that timeline in a minute.

14 A Yeah. That sounds right.

15 Q Okay. All right. So before we dive
16 into the -- the calendar, do you recognize the
17 exhibits that have been marked as exhibit 11 as the
18 documents that were attached to your pre-filed
19 testimony?

20 A Yeah. These are -- these were the
21 normal ones.

22 Q And just so the record's clear, you
23 recognize the documents compiled as exhibit number
24 11 as the documents that were attached as exhibits
25 to your pre-filed testimony that is part of exhibit

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1 **number 10?**

2 A Yes.

3 Q Okay. All right. Let's -- let's show
4 **Ms. Walker the calendar we created. So bear with**
5 **us.**

6 A Okay.

7 Q It's our -- it's our handiwork. It's a
8 -- it's a demonstrative exhibit. It's -- we created
9 it and we did it for purposes of trying to orient
10 you to the timeline.

11 **(Exhibit number 12**
12 **marked for identification.)**

13 **Mr. Balser: This is not a notebook.**

14 MS. NOBLES: Huh?

15 Mr. Balser: What number, 21? Okay.

16 By Mr. Balser:

17 Q Okay. Ms. Walker, as I indicated, we
18 **have marked --**

19 COURT REPORTER: Twelve.

20 By Mr. Balser:

21 Q -- as exhibit number 12 a demonstrative
22 **exhibit that's a calendar that my colleague, Ms.**
23 **Nobles, who's sitting here with me put together to**
24 **assist us in trying to orient you to the timeline on**
25 **the filing of your testimony. Okay?**

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1 A Uh-huh.

2 Q So let's -- let's start on the second
3 page of exhibit 12, which is May of 2015. And I
4 want to start with May 26th, which is the date that
5 your testimony was submitted. And then direct your
6 attention to the events to -- to May 21st --
7 Thursday, May 21st. That was the date your husband
8 was admitted to the hospital on an emergency basis.
9 Is that correct to the best of your knowledge?

10 Mr. Balser: Whoever is on the phone,
11 can you please mute your line.

12 THE DEPONENT: Was it the 21st of May?

13 Mr. Balser: Let's give her the email.
14 I know it's hard to remember dates from that long
15 ago. Well, I'll --

16 THE DEPONENT: Yeah.

17 Q -- show you an email to -- to help you
18 -- help us -- to help you help us establish that
19 that was the date that -- that your husband was
20 admitted to the hospital. I'm sorry we're -- I'm
21 jumping around a little bit on Ms. Noble. So just
22 bear with me. She had me very well organized and
23 I'm completely turned everything upside down so.

24 THE DEPONENT: Well, it's easy enough
25 when you got all this -- all these dates and events.

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1 Mr. Balser: I'm just trying to make it
2 as -- trying to make it as comprehensible as
3 possible. Okay. We'll have to tie this on onto tab
4 6. Okay. Exhibit 13?

5 (Exhibit number 13
6 marked for identification.)

7 COURT REPORTER: Yes.

8 By Mr. Balser:

9 Q Okay. Ms. Walker, we've handed you what
10 has been marked as exhibit number 13. And this is
11 an email from you to a number of people that's dated
12 May 22nd. And the first line of that says, hey,
13 everyone I just want to let you know -- all know
14 that after spending all day yesterday in the
15 emergency room with Gene, he was admitted for kidney
16 failure. So I'm certainly not trying to drudge up
17 any bad memories here, but --

18 A Yeah.

19 Q -- I just wanted to orient you to the
20 date. And so if -- if -- if you sent an email on
21 the 22nd of May saying yesterday, Gene was admitted.
22 Does that help you --

23 A Yeah.

24 Q -- refresh your recollection it was May
25 21st that -- that your husband was admitted to the

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1 hospital?

2 A Yeah.

3 Q Okay. So what -- what I want to do --
4 and I want to do this pretty -- I -- we don't need
5 to spend a lot of time on this, but I want -- I do
6 want to just kind of tick through with some
7 documents -- the dates that are reflected on this
8 calendar that we handed you --

9 A Uh-huh.

10 Q -- which is exhibit -- what did I say it
11 was 12?

12 A Yeah. I think so -- yeah, 12.

13 Q Okay. So let's start on -- on the first
14 page and we looked at -- we've already looked at
15 exhibits -- sorry, I -- I don't mean to --

16 A Yeah, that's --

17 Q -- reach -- reach over here, but I just
18 want to make sure I got the record right. We looked
19 at exhibits 8 and 9, which were the calendar invites
20 and your --

21 A Uh-huh.

22 Q -- acceptance for --

23 A The 15th.

24 Q -- a -- a meeting to discuss your --
25 your testimony on April 14th and 15th.

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1 A Uh-huh.

2 Q **And those are reflected on the calendar.**
3 **Do -- do you have any recollection of those meetings**
4 **that are referenced on the 14th -- on the 15th?**

5 A Huh-uh.

6 Q **Okay.**

7 COURT REPORTER: Is that a no?

8 THE DEPONENT: No. I'm sorry.

9 COURT REPORTER: Thank you.

10 By Mr. Balser:

11 Q **And do you -- you -- you don't have any**
12 **reason to doubt that a meeting occurred. You just**
13 **don't remember it.**

14 A Yeah. I just don't remember it.

15 Q **Okay. And we also -- and we're going to**
16 **show you -- and maybe we should just do this now.**
17 **We -- we pulled your P.T.O. records.**

18 A Uh-huh.

19 Q **Because I know that during this time**
20 **period, especially with your husband's illness,**
21 **there were a number of days that you were out. And**
22 **we wanted to place those on the calendar, but we**
23 **wanted --**

24 A Right.

25 Q **-- to have evidentiary support for that.**

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1 A Yeah.

2 Q So we -- we've compiled your -- your
3 P.T.O. records and -- and P.T.O. is paid time off?

4 A Right.

5 Q Okay. Now, we're -- we're happy to
6 treat this as confidential and -- and anything that
7 you want designated as confidential, we're happy to
8 designate as confidential. This, I think would
9 qualify as a record that you might not want in the
10 public domain. We're happy to keep this part of the
11 transcript sealed and this document sealed.

12 A Okay.

13 Mr. Balser: But let's mark exhibit
14 number 14, which is your P.T.O. records for -- it's
15 all of 2015.

16 (Exhibit number 14
17 marked for identification.)

18 Mr. Balser: I -- I really just want to
19 focus your attention on the time period that's
20 reflected on the calendar.

21 THE DEPONENT: Uh-huh.

22 Mr. Balser: Which is, you know, between
23 April 14th and May 31st. And --

24 THE DEPONENT: 14th through the 17th.

25 By Mr. Balser:

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1 Q And so if we look at the time period of
2 the 21st through the 29th, all of those work days
3 you were on P.T.O. because your husband was in the
4 hospital. Correct?

5 A Uh-huh.

6 COURT REPORTER: Is that a yes?

7 THE DEPONENT: Yes.

8 COURT REPORTER: Thank you.

9 By Mr. Balser:

10 Q And then there are other various days
11 that are reflected as either partial or full P.T.O.
12 days throughout 2015 on this -- on exhibit 14.
13 Correct?

14 A Uh-huh.

15 Q And what we tried to do -- and what we
16 did is for every paid time off day that's reflected
17 on exhibit 14, we put a red P.T.O. indication on the
18 calendar --

19 A Calendar.

20 Q -- that we marked as exhibit 12. Okay?

21 A Uh-huh.

22 Q Do you have any reason to believe that
23 the P.T.O. information contained in exhibit 14 is
24 inaccurate?

25 A Yeah.

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1 **Q You think it is inaccurate?**

2 A Yeah.

3 **Q Okay. Tell me what you think is**
4 **inaccurate about --**

5 A I may not have --

6 **Q -- the information.**

7 A -- recorded it as P.T.O. time and not
8 have been at work.

9 **Q Okay.**

10 A The first three years, I was at the
11 project, I didn't take any vacation because I was
12 too busy. And so I didn't keep up with my P.T.O.
13 time. I took time off whenever I needed it.

14 **Q Okay. But in terms of official reported**
15 **paid time off time, you don't have any reason to --**
16 **to quarrel with the data that's reflected on exhibit**
17 **14?**

18 A No. No.

19 **Q All right.**

20 A But just because it says it -- just
21 because it doesn't have P.T.O. on a calendar day,
22 doesn't mean I was at work.

23 **Q I see.**

24 A Is what I'm saying.

25 **Q Okay. I understand. And -- and so how**

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1 **would that work? So if you had -- if you had**
2 **accrued vacation time -- is that what happened?**
3 **Does vacation time accrue? It -- did it accrue for**
4 **you or no?**

5 A Yeah.

6 Q **Or did you lose it? Was it use it or**
7 **use lose it?**

8 A Yeah. It was a use it or lose it.
9 But at my level and with the number of years I had
10 with the company and the forfeits I had and the
11 number of hours I've put in, the way I viewed it
12 was, if I need time off, I take it.

13 Q **Okay. And so --**

14 A I normally worked probably about 60
15 hours a week.

16 Q **So as I understand what you're saying,**
17 **that there may be some days that you took as mental**
18 **health days or relaxation days or non-work days that**
19 **weren't designated as official paid time off days,**
20 **but just --**

21 A Right.

22 Q **-- as an executive you might just take a**
23 **day off here and there?**

24 A No. I might have worked four tens and
25 taken Friday --

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1 Q **Got it.**

2 A -- as my day off.

3 Q **Got it. Got it. And did you -- you --**

4 A Which is very -- I mean, that's a
5 common practice at the nuclear.

6 Q **So you just -- everybody would go hard**
7 **for four days and then take a day off or some people**
8 **would? Is that what you're saying?**

9 A No. That's normal practice, four
10 tens.

11 Q **And tell me what four tens means.**

12 A Forty hours in four days.

13 Q **Okay.**

14 A And then you don't work the rest of
15 the weekend.

16 Q **Did -- did you -- was there some kind of**
17 **-- I assume you didn't clock in?**

18 A No.

19 Q **But you -- was there some record---**
20 **recording of your --**

21 A No.

22 Q **-- time or no? As an executive you just**
23 **-- you worked --**

24 A There were no clocks for any
25 professionals.

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1 **Q Yeah. Okay.**

2 A My accountants didn't clock in.

3 **Q Got it. So there may be -- and when you**
4 **worked four tens, would you typically work Monday**
5 **through Thursday and take Friday off or would there**
6 **be -- or would it vary?**

7 A Not necessarily. I mean, depending
8 what we were working on.

9 **Q Okay.**

10 A I mean, there were times that I worked
11 on Saturdays and Sundays. I mean, that project
12 could consume you. You can ask my husband.

13 MR. WALKER: Yeah. She'd leave in the
14 dark, get home in dark. Yeah.

15 Mr. Balser: Okay.

16 THE DEPONENT: It was a life style.

17 Mr. Balser: Got it. Okay.

18 THE DEPONENT: And not a good one.

19 By Mr. Balser:

20 **Q Let's look at --**

21 A Not one I would recommend to anybody.

22 Mr. Balser: What exhibit is that? Is
23 that what this is?

24 MS. NOBLES: Uh-huh.

25 Mr. Balser: I just got to catch up with

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1 myself here. Okay. Tab 38. Exhibit?

2 COURT REPORTER: Fifteen.

3 (Exhibit number 15

4 marked for identification.)

5 By Mr. Balser:

6 Q Okay. You've been handed what we've
7 been marked as -- what we have marked as exhibit 15,
8 which is a -- a meeting request to review direct
9 testimony on April 22nd of 2015. Do you recall
10 meeting on April 22nd, 2015 to go over pre-filed
11 testimony?

12 A I don't remember it. That's not
13 saying that it didn't happen. Does it say whose
14 pre-filed testimony?

15 Q It just says initial review of direct
16 testimony as the subject line. You are included in
17 the invitation line. If you start at the bottom --
18 the original appointment that was sent on behalf of
19 Byron Hinson to a number of people including you.

20 A Well, keep in mind, Belton Zeigler,
21 who is copied is two -- Belton wrote the senior
22 executive's testimony. And that was always
23 written early because he always baby sat them.

24 Q Let's look at the next -- you're saying
25 he -- he always did the initial draft of the

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1 **testimony?**

2 A For the executives.

3 **Q For the executives.**

4 A The senior executives. And then
5 everybody else's got written later after theirs.

6 Mr. Balser: Sixteen?

7 (Exhibit number 16

8 marked for identification.)

9 THE DEPONENT: Theirs was the story to
10 be told. And then everybody else's was the crafted
11 to support their story.

12 By Mr. Balser:

13 **Q You're being handed what has been marked**
14 **as exhibit 16. If we start at the bottom of exhibit**
15 **16, there's an email from Cynthia Westmoreland to a**
16 **group of people. The email is on Monday, April**
17 **20th. It says I'll be ordering lunch from The**
18 **Hampton Place Café for your meeting on Wednesday,**
19 **April 22nd. Please take a look at the menu, et**
20 **cetera. And then you responded I would love a**
21 **T-H-S-M. Thank you. Collette Walker. What's**
22 **T-H-S-M?**

23 A A sandwich.

24 **Q Okay. Does that -- does that indicate**
25 **to you that you were present or at least were**

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1 anticipating being present because you had ordered
2 lunch for a meeting on April 22nd to review
3 testimony?

4 A Yeah. But it doesn't tell you whose
5 testimony.

6 Q Do you have any reason to believe that
7 you did not attend that meeting on April 22nd?

8 A No. I probably did.

9 Q And was it common -- I think you -- you
10 are suggesting this, but I want to make -- just make
11 sure I'm clear on it -- was it common for employees,
12 including executives of SCANA, SCE&G, to attend prep
13 sessions for other witnesses' testimony?

14 A Unfortunately, you had to.

15 Q Okay. And you say unfortunately because
16 you had to sit through all that, when you --

17 A No. Because they were so
18 condescending in their comments. Steve
19 especially.

20 Q That's what made it unfortunate?

21 A Very.

22 Q Let's see. Okay. Do you recall
23 receiving a -- so if we go back to this calendar
24 that we're looking at, which is exhibit number 12.
25 And let's go to May. There's an indication on May

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1 **4th that you received a draft of your testimony. Do**
2 **you recall receiving a draft of your pre-filed**
3 **testimony on May 4th, 2015?**

4 A I don't remember.

5 Q **Okay. I'm handing you what we've marked**
6 **as exhibit --**

7 COURT REPORTER: Seventeen.

8 (Exhibit number 17
9 marked for identification.)

10 By Mr. Balser:

11 Q **-- 17, which is an email from -- you**
12 **asked who Ben Mustian was. I think this might solve**
13 **the mystery.**

14 A Huh.

15 Q **Ben Mustian was a lawyer who works at**
16 **Willoughby and Hoefer, sent you an email, Carlette.**
17 **And the attachment referenced is in your -- you flip**
18 **this to -- to Jim -- to Jimmy Addison -- attachments**
19 **direct testimony of Carlette Walker, draft 5/4/2015.**
20 **Do you see that?**

21 A Uh-huh.

22 Q **Yes?**

23 A Yes.

24 Q **Does this refresh your recollection that**
25 **on May 4th, 2015, you received a draft of your**

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1 **direct testimony from Ben Mustian?**

2 A It appears that may have happened.

3 Q **Do you know why you forwarded the --**
4 **your draft testimony to Mr. Addison?**

5 A Probably, because I didn't like it.

6 Q **Do you have any specific recollection of**
7 **why you forwarded your email to mister -- I mean,**
8 **your pre-filed testimony to Mr. Addison?**

9 A I can't remember.

10 Q **And after -- do you recall that after**
11 **you received the draft testimony reflected on**
12 **exhibit 17 that you called Mr. Willoughby the next**
13 **day?**

14 A I didn't remember that.

15 Q **It was a long time ago.**

16 A Yeah.

17 Q **I -- I wouldn't expect you to.**

18 A Yeah.

19 Mr. Balser: What -- what tab is that?
20 (Off-the-record discussion.)

21 (Exhibit number 18
22 marked for identification.)

23 Q **You've been handed what has been marked**
24 **as exhibit 18. This is an email from Mitch**
25 **Willoughby to you saying sorry I missed your call**

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1 earlier today. Are you available to talk and meet
2 in the morning, Mitch. Do you see that?

3 A Uh-huh.

4 Q Is that a yes?

5 A Yes.

6 Q So does that indicate that you had
7 placed a call to Mr. Willoughby on that day -- that
8 is May 5th, 2015?

9 A It looks like it.

10 Q And I assume you don't recall this
11 either, but do you know -- do you have a
12 recollection of sending an email to Mr. Willoughby
13 the following day, that is May 6th, 2015?

14 A I have no recall of that.

15 Mr. Balser: Thank you. I'm going to
16 try to get through this before the ten minutes is
17 up.

18 By Mr. Balser:

19 Q Okay. You've been handed what we've
20 marked as --

21 (Exhibit number 19
22 marked for identification.)

23 COURT REPORTER: Nineteen.

24 By Mr. Balser:

25 Q -- exhibit 19, which is an email from

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1 you to Mr. Willoughby dated May 6, 2015. Do you see
2 that?

3 A Uh-huh. Yes.

4 Q And -- and this is just an effort to try
5 to schedule a time to meet or discuss -- have a
6 discussion with him?

7 A Yes.

8 Q And this says what about -- so this was
9 sent on May 6th, 2015. And it says, what about
10 tomorrow morning before we start reviewing
11 testimony? Does this indicate that there was a
12 meeting scheduled for May 7th to review testimony?

13 A Right. But again, I don't know whose
14 testimony.

15 Q Understood.

16 Mr. Balser: What's next. Tab 23.

17 Okay. Oh, here. Okay. What are we on, 20?

18 (Exhibit number 20
19 marked for identification.)

20 By Mr. Balser:

21 Q All right. Ms. Walker, you have been
22 handed what we've marked as exhibit number 20. Do
23 you recognize this document as a calendar invitation
24 that you sent on May 13th, 2015?

25 A Yes.

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1 Q And what is the subject matter of the
2 invitation?

3 A Draft testimony review with Mitch.

4 Q Do you have any reason to doubt that you
5 sent this invitation?

6 A No.

7 Q Do -- in fact, you sent a follow up
8 calendar invitation just a few hours before the
9 meeting. Do you recall that?

10 A No.

11 Mr. Balser: Twenty-one?

12 (Exhibit number 21
13 marked for identification.)

14 By Mr. Balser:

15 Q Ms. Walker, we've handed you what we've
16 marked as exhibit number 21. Do you recognize this
17 document as a calendar invitation that you sent on
18 May 18th, 2015 at 9:33 a.m.?

19 A Yes.

20 Q And the two recipients are Mitch
21 Willoughby and Benjamin Mustian. Is that right?

22 A Right.

23 Q And that was for a meeting that same day
24 at 11:00 a.m.?

25 A Yes.

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1 Q And it has the same subject line as the
2 invitation that we just looked at --

3 A Yes.

4 Q -- as exhibit 20 -- as exhibit 20?

5 A Yes.

6 Q Do you have any reason to doubt that you
7 attended the meeting to review your testimony on May
8 18th as reflected on these invitations?

9 A I do. You got to keep in mind that I
10 mean, I'm pulling my whole team together here.
11 And we're not necessarily reviewing draft
12 testimony as much as we may have been actually
13 trying to collect what should be in the testimony
14 for Mitch to prepare. You're assuming that the --
15 the draft is prepared. But when I pull my team
16 together, including Skip, I'm also trying to get
17 my team to identify what needs to be put into
18 testimony to be reflective of where the project
19 is.

20 Q I understand. But you -- you're not --
21 you're not testifying that you didn't meet on May
22 18th to discuss your testimony. You're saying it
23 may have been to discuss your testimony, it may not
24 have been.

25 A Exactly.

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1 **Q Okay.**

2 A But I'm -- I'm trying to get you to
3 realize that this may not have been to review a
4 draft that was submitted as in this book like
5 you're trying to assume.

6 **Q I'm --**

7 A Or you're insinuating.

8 **Q I'm not trying to insinuate or assume**
9 **anything. I'm just trying to figure the facts,**
10 **sorry.**

11 A Well, I'm just trying to make the
12 facts.

13 **Q Okay. So am I.**

14 A And the fact is, it's not necessarily
15 the draft that's in this notebook. This may have
16 been on the front end when we were trying to
17 identify what should be in the testimony.

18 **Q But sitting here today, you can't recall**
19 **one way --**

20 A Exactly.

21 **Q -- or the other? Okay. Let's look**
22 **at --**

23 **Mr. Balser: What is this -- 22?**

24 **(Exhibit number 22**
25 **marked for identification.)**

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1 **By Mr. Balser:**

2 **Q All right. Ms. Walker, you have been**
3 **handed what we have marked as exhibit number 22.**
4 **This is an email from Shirley Johnson to you and**
5 **Skip Smith, subject testimony review. Hey,**
6 **Collette, hope the officers meeting well today.**
7 **Just an F.Y.I., Skip and I talked this morning after**
8 **our page turning review of testimony drafts**
9 **yesterday. Do you see that?**

10 **A Uh-huh.**

11 **Q Does that refresh your recollection that**
12 **-- that there was a quote, page turning, close quote**
13 **review of the drafts in the May 18th meeting that we**
14 **looked at the invitations for?**

15 **A Like I said before, I mean, different**
16 **-- testimony is prepared at different times. So I**
17 **don't know whose testimony she sat in and did the**
18 **page turning for.**

19 **Q Okay.**

20 **A It doesn't tell you.**

21 **Q And you can't recall sitting here today,**
22 **whose testimony it was that was the subject of the**
23 **meeting on May 18th?**

24 **A No. I mean, I can't remember anything**
25 **back at that time. Can you remember what you were**

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1 doing on May 18th?

2 **Q I can't remember what I had for**
3 **breakfast so.**

4 A I know.

5 **Q I'm not a good --**

6 A That's what I'm saying.

7 **Q I'm not a good measuring stick.**

8 A Yeah. I'm not -- I mean, I just can't
9 remember back this far.

10 **Q I understand. And I'm not -- I'm not**
11 **trying to in anyway suggest that you should be able**
12 **to.**

13 A Yeah. I'm sorry.

14 **Q Because please understand, I'm not --**

15 A Yeah.

16 **Q -- in anyway trying to be critical of**
17 **the fact that you have no recollection. But we all**
18 **send emails. We all send calendar invites. Those**
19 **are current data points that we use --**

20 A Yeah.

21 **Q -- to get from, you know, one meeting to**
22 **the next. And there is a record of that.**

23 A Yeah.

24 **Q So I'm just trying to establish the**
25 **timeline and facts based on what we have. Because I**

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1 **know --**

2 A I mean, it --

3 Q -- no one can remember what they did and
4 **a -- a meeting after meeting, after meeting three**
5 **years ago.**

6 A Yeah.

7 Q **I get that.**

8 A And we were in so many meetings.

9 There was -- it was like the most chaotic
10 lifestyle. You know, I was in Jenkinsville, but
11 the headquarters was in Casey. That adds another
12 variable.

13 Q **All right. I had hoped to get all the**
14 **way through. I'm close. I think we have two**
15 **minutes left on the tape. It's probably a good time**
16 **to break for lunch. We've been going for a couple**
17 **of hours this morning. So why don't -- why don't we**
18 **take a break. We'll grab lunch and we'll come back**
19 **and I'll try to be -- I'll wrap this up promptly --**
20 **as -- as quickly as we can after lunch.**

21 A Okay.

22 Q **All right.**

23 VIDEO TECHNICIAN: This marks the end of
24 video number one, the deposition of Carlette Walker.
25 We're off the record at 12:35 p.m.

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1 (Whereupon, a break was taken
2 from the proceedings.)

3 (Exhibit number 23
4 marked for identification.)

5 VIDEO TECHNICIAN: This is the
6 continuation of the deposition of Carlette Walker.
7 This is video number two, on the record at 1:47 p.m.
8 By MR. BALSER:

9 **Q Ms. Walker, you have been handed what**
10 **has been marked as exhibit number 23, which is an**
11 **e-mail from you dated May 26, 2015 to Shirley**
12 **Johnson, Cynthia Lanier and Margaret Falco. The**
13 **subject line is O.R.S. tour and the e-mail states,**
14 **hey, I had planned to go on the tour this morning**
15 **with the O.R.S. before Gene hospitalized, but I am**
16 **not comfortable leaving Columbia today. I am going**
17 **to Cayce to print draft testimony that is being**
18 **filed this afternoon so I can read it at the**
19 **hospital. I'll be watching e-mail some today. Hope**
20 **y'all had a nice holiday weekend, Carlette Walker.**
21 **Do you recall sending that e-mail?**

22 A No.

23 **Q Did -- do you recall going to Cayce and**
24 **printing out your draft testimony that was going to**
25 **be filed that afternoon?**

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1 A No.

2 Q Do you know one way or the other whether
3 you did or didn't, you just -- or you just don't
4 remember?

5 A I just don't remember.

6 Q All right.

7 A I doubt I went by there. I mean, I
8 didn't read any of the testimony.

9 (Exhibit number 24
10 marked for identification.)

11 By MR. BALSER:

12 Q Tab 35. You've been handed what was
13 marked as exhibit 24. There's an e-mail that
14 says -- it's from you on the 26th of May, 2015 to
15 Alice Spotts. Hey, Alice, could you print the
16 attachments so I can run by your office and pick
17 them up and read them at the hospital? Do you see
18 that?

19 A I do.

20 Q Does that refresh your recollection as
21 to whether or not you had your testimony printed and
22 went by the office to pick it up?

23 A I don't remember going by and picking
24 it up. Was that 2:00 a.m.?

25 Q It's hard -- it -- it -- it's hard to --

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1 **it says 2:00 a.m. to 4:00 eastern time. So I don't**
2 **know what the time stamp indicates.**

3 A May 26th was when my husband was at
4 the worst that he could be. So I doubt I went. I
5 was spending the night at home and driving back
6 and forth to the hospital every day to be with
7 him.

8 **Q You --**

9 A Not only did he have kidney failure,
10 but they also had to do surgery on his arm twice.

11 **Q Tab 34. Where's the -- yeah, tab 20.**

12 MR. BALSER: What number is this?

13 COURT REPORTER: Twenty-five.

14 (Exhibit number 25
15 marked for identification.)

16 By MR. BALSER:

17 **Q Ms. Walker, you've been handed what has**
18 **been marked as exhibit 25, which is an e-mail string**
19 **beginning with an e-mail from you to a group of**
20 **people on May 27th. And then responses from Kevin**
21 **Kochems, an e-mail exchange with Kevin Kochems. I**
22 **want to direct your attention to that interaction**
23 **with Mr. Kochems. He says, Carlette, I'm happy to**
24 **hear Gene is improving. I'm certain that his**
25 **progress and good spirits are the res--- a direct**

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1 result of your being there with him. I wouldn't
2 underestimate how much of an impact that can have.
3 We got it here, so don't worry about work at all.
4 It will be here when you get back, Kevin.

5 You responded on Thursday, May 28th,
6 saying, thanks, Kevin. I spoke with Mitch Monday
7 evening and he said you were doing an awesome job
8 in carrying the ball, my testimony all weekend,
9 including on Monday. I don't know how to express
10 my gratitude. Is the Mitch referred to there
11 Mitch Willoughby?

12 A That's correct.

13 Q And then Carlette -- he says, Carlette,
14 I'm glad I could help, as you know, you -- as I --
15 as I know you would do the same thing for me. I
16 just hope you're happy with how your testimony
17 turned out, Kevin. And then you said, I'm very
18 happy with it, three exclamation points. Do you see
19 that?

20 A Yeah.

21 Q Now, Mr. Kochems was not somebody to
22 whom you reported. Right? He was --

23 A No, he --

24 Q You were hi--- you were his boss.

25 A Right.

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1 **Q Do you -- do you consider him a friend?**

2 A I don't know -- I wouldn't say friend.
3 I mean, we grew to have a -- a friendly working
4 relationship, but I had good relationships with
5 all of my employees.

6 **Q Were you being truthful with Mr. Kochems**
7 **when you said that you were very happy with your**
8 **testimony?**

9 A No. I mean, I had confidence that he
10 would make sure it was done right. I didn't have
11 time to deal with anything to do with work.

12 **Q So when you said I'm your -- I'm very**
13 **happy with it, you were lying to Mr. Kochems?**

14 A No, I wasn't lying. I was just
15 expressing my -- my -- my confidence in him.

16 **Q Now, you appeared at the Public Service**
17 **Commission hearing live in July of 2015. Correct?**

18 A Yes.

19 **Q And you had testified before the Public**
20 **Service Commission several times before May of 2015**
21 **as an officer of the company. True?**

22 A That's correct.

23 **Q Now, I -- I handed you before this big**
24 **binder, which is the transcript of the proceedings**
25 **of the 2015 P.S.C. matter. I want to direct your**

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1 attention to page 592 of the transcript.

2 A Okay.

3 Q This is the -- this is a transcript of
4 the live testimony that you provided.

5 Mr. Willoughby is examining you. He asked you to
6 state your name for the record and asked you what --
7 what your employment status is. And he asked you,
8 as to your testimony, are there any corrections?
9 And you said yes. And he asked you to direct your
10 attention as to where. And you made a correction on
11 page 17, line 1 of your pre-filed testimony. Is
12 that correct?

13 A That's right.

14 Q And then if we look at page -- bottom of
15 that page, he asked were there any other
16 corrections, and you say no on the top of page 5---
17 593. Mr. Willoughby then asked you at 5--- page
18 593, line 5, if I ask you the questions that appear
19 in the testimony as corrected, would your answers be
20 the same from the witness stand here today? And you
21 said they would be. Right?

22 A Yes.

23 Q And your testimony before the Public
24 Service Commission that was presented and that you
25 validated was true and accurate, was it not?

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1 A It was.

2 Q And if we look at page 608 of the
3 transcript binder, that is a chart that's in your
4 pre-filed testimony. At the top of this chart, it
5 says updated E.P.C. contract costs. Do you see
6 that?

7 A Yeah, I do.

8 Q And that includes delay and other
9 E.A.C. costs; is that right?

10 A E.P.C. costs?

11 Q E.A.C. costs.

12 A E.A.C.?

13 Q Do you see that?

14 A Yes.

15 Q Delay in other E.A.C. costs?

16 A Yes.

17 Q And then towards the bottom, we see the
18 total base project costs?

19 A Right.

20 Q In 2007 dollars?

21 A Yes.

22 Q And that number is 698,000,233 dollars?

23 A That's correct.

24 Q And then at the very bottom, we see that
25 the total cost, the gross construction cost in

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1 **current dollars is 1,072,000,350 dollars?**

2 A That's right.

3 Q **And these figures that are in chart A**
4 **include what the consortium's estimated completion**
5 **was projected to be. Correct?**

6 A That's correct.

7 Q **Now, I wanted to ask you about other**
8 **people's testimony at the hearing. Did you -- did**
9 **you sit through the entire proceeding?**

10 A Yeah.

11 Q **Mr. Byrne also submitted pre-filed**
12 **testimony. Correct?**

13 A Yes.

14 Q **And if we look at page -- we're not**
15 **going to go through all of this chapter and verse,**
16 **but if you look at page 237 of exhibit number 10 --**

17 A 237?

18 Q **Yes, ma'am. This is Mr. Byrne's**
19 **pre-filed testimony. And then if you look at page**
20 **274 of the transcript, that is where Mr. Byrne's**
21 **live testimony begins. No? Okay. I'm sorry.**
22 **What? Oh, pre-filed. Okay. Let's look at page**
23 **274, which is in his pre-filed testimony.**

24 A 274?

25 Q **Yes, ma'am. I'm sorry. I'm jumping**

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1 around here.

2 A Okay.

3 Q Mr. Byrne testified that -- if you start
4 at line 19, he says, as to both timing and cost, the
5 schedules are based on productivity factors that
6 WEC/CBNI represents can be met given the current
7 status of the project. Meeting these product---
8 productivity factors will pose a challenge to
9 WEC/CBNI, but doing so will benefit the project both
10 in terms of cost and schedule. For that reason, as
11 owner, SCE&G has no basis or interest in -- in
12 insisting that WEC/CBNI should use less challenging
13 assumptions. However, SCE&G does recognize that
14 WEC/CBNI has set itself a significant challenge as
15 to future productivity. Do you see that?

16 A Yes.

17 Q So he -- he was not telling the
18 commission that the schedules were based on
19 productivity factors that were currently being
20 achieved. Right?

21 A Right.

22 Q And in his --

23 A And that's -- I mean, let --

24 Q And in -- and in his live testimony,
25 he -- he goes on -- and we're not going to go

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1 through it chapter and verse. He goes on, if you
2 look at page 217, line 13 --

3 A 217?

4 Q Right. Line 13. He says -- and this is
5 his live testimony. It is taking the consortium too
6 much time and too much labor expense for the scopes
7 of work re--- required to complete the project. For
8 the current schedules to be achieved, the consortium
9 must improve the product--- the productivity factors
10 of their workforce. Unfavorable productivity
11 factors have been the matter of frank discussions
12 between the parties, and the consortium senior
13 leadership recognizes the need to improve in this
14 area. Do you see that?

15 A Yes.

16 Q And were you a party to any of the
17 conversations that SCE&G had with the consortium
18 regarding improving their productivity factors?

19 A No.

20 Q In the September 2015 P.S.C order, which
21 approved the schedules and costs submitted and
22 proposed by the company, the -- the -- the
23 P.S.C. referred to Mr. Byrne's testimony. And I
24 want to direct your attention to the P.S.C.'s order.
25 Have you seen the order entered September 10th, 2015

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1 **before -- by the Public Service Commission?**

2 A I didn't read it.

3 **Q Okay.**

4 MR. RICHARDSON: It's not a book.

5 By MR. BALSER:

6 **Q It's not a book. More paper for you to**
7 **take home.**

8 MR. RICHARDSON: You're very right.

9 MR. BALSER: Twenty-six?

10 (Exhibit number 26

11 marked for identification.)

12 By MR. BALSER:

13 **Q You've been handed what has been marked**
14 **as exhibit number 26. Ms. Walker, your -- your --**
15 **is it your tes--- who just joined?**

16 MR. GALVIN: Greg Galvin. We got kicked
17 off.

18 By MR. BALSER:

19 **Q Okay. So we're looking at exhibit**
20 **number twenty---**

21 A Six.

22 **Q -- six. I might have said 27. I meant**
23 **26. Okay. This is an order that was entered by the**
24 **Public Service Commission on September 10th, 2015.**
25 **You haven't read this?**

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1 A No.

2 Q Okay. I'm not going to ask you to read
3 it now and I'm not going to ask you any questions
4 about it if you haven't read it.

5 A Okay.

6 Q You just saved about 20 minutes.

7 A Perfect.

8 Q I want to talk about the E.P.C. a minute
9 that you referred to earlier. And I'm trying to
10 understand from you -- and I want you to just tell
11 me in your own words what you thought was wrong
12 about entering into that amendment in
13 two-thousand -- October of 2015. Why was that bad
14 for SCANA to do, in your mind?

15 A Well, you're talking about when they
16 went with a supposed fixed price?

17 Q So as I understand it, I want to -- and
18 I just want to understand where -- what your -- what
19 your testimony is about. But -- but this is my
20 understanding, that there was an amendment entered
21 into by the parties, the consortium and the owners,
22 in October of 2015 --

23 A Uh-huh.

24 Q -- that gave the company, the owners,
25 the option to --

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1 A To go to a fixed price.

2 Q -- to go to a fixed price.

3 A Right.

4 Q And it did a lot of other things too.

5 A Right.

6 Q Resolved other disputes and let
7 C.B.N.I. out, let Fluor come in. So there are --

8 A Yeah.

9 Q -- a lot of different things that
10 happened. And then later, it's my understanding, in
11 the spring of 2016, the company -- or sometime in
12 2016, the company elected to exercise its option to
13 convert the -- the amendment and the contract to a
14 fixed price option. Is that your understanding?

15 A Yeah, I don't know what happened in
16 the spring of '16.

17 Q 2016. Okay. So focusing on the
18 amendment to the E.P.C. contract that -- that was
19 entered into in October of 2015 --

20 A Uh-huh.

21 Q -- I'm unders--- I understood you to say
22 in response to questions from Mr. Haltiwanger
23 earlier and today and this morning that you had a
24 problem with what the company did there. And I'm
25 trying to --

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1 A Yeah.

2 Q -- understand why. What -- what is it
3 about that amendment that you think was bad, wrong,
4 improper?

5 A Yeah, well, when myself, Ken Browne,
6 Kevin Kochems and Skip Smith, we were all involved
7 working with Kevin Marsh, Jimmy Addison and Steve
8 Byrne doing analysis of all of the outstanding
9 commercial issues and also the E.A.C. and all of
10 the -- the financial aspects of the project. And
11 we were running different models, different
12 scenarios for them to negotiate with Westinghouse
13 and C.B.N.I., and we were, you know, kind of
14 sequestered into one room. Westinghouse was
15 represented in one room and C.B.N.I. was in
16 another room. And then they had a -- a joint room
17 where the executives from the three companies
18 would go in and -- and discuss and negotiate
19 different aspects of the contract.

20 Well, we -- this went on for probably
21 I would say 10 to 14 days straight. And during
22 all of these calculations that we were going
23 through and sending the executives back in and
24 getting feedback from them, at some point, Kevin
25 came back in and told us that he had agreed to

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1 making payments -- first of all, they had let
2 C.B.N.I. -- they released them from the contract
3 with no liability or responsibility for any of the
4 work that they had done from the beginning of the
5 project. That would include the Shaw work and all
6 of the work that C.B.N.I. had done. So that
7 represented at least six years that I had been on
8 the project -- and I think the project had been
9 going for several years before I got there.

10 And keep in mind that I was at -- in
11 corporate compliance doing my job. And then I was
12 plucked up out of corporate compliance, doing that
13 one day, and then called up to the C.E.O.'s office
14 and told that, oh, we don't -- I -- I was asked if
15 I wanted to -- be interested in being the senior
16 vice-president of H.R. and told I want you to
17 interview for that position. Interviewed for that
18 position and I was told that I was one of the top
19 contenders, myself and one other guy. And then I
20 get called up by Timmerman and he says, oh, we
21 don't need you -- you would be a waste of your
22 talents to be in H.R. I need you to go up at the
23 project; Carlette, or I need you to go up there
24 for three or four years, get things set up, get
25 controls in place. And then when you finish

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1 there, you come back to me and I'll tell you --
2 you tell me what you want to be and then you can
3 be that. And I was like, oh, great.

4 So I was literally dropped into a
5 project that was already three years going. And
6 Ron Clary, who was made the V.P. of construction
7 when I was named V.P. of nuclear finance, did not
8 appreciate, nor did he want anybody from SCANA
9 coming into his nuclear project.

10 So from the very onset, it was like
11 fighting a war to be accepted into the project. I
12 mean, I went to his boss and asked him to help me
13 to penetrate into the project. And then I went to
14 my boss, who was Jimmy Addison, and I had to ask
15 him to help me to break through Ron Clary to get
16 accepted into the project. He had me taken off of
17 distri--- letter distributions. I mean, he
18 would -- he did everything he could to have me
19 excluded so I couldn't do my job.

20 All right. So then -- so once -- once
21 I finally got into the project and I started
22 learning about it, then I became an integral part
23 of the project. So I started figuring out what we
24 were spending and how we were spending it. So
25 then when we went and got into this group setting,

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1 I was able to add value. Ron Clary was no longer
2 around.

3 So -- I don't even know why I got off
4 on that -- on that tangent. But anyway, so when
5 we were in the room and he was discussing what
6 the -- the terms were going to be, he said that we
7 were going to drop C.B.N.I. and let them walk away
8 from the table and we would have nobody to go back
9 against for any mis--- you know, like wrong work
10 or, you know, anything that's been done wrong. We
11 would have to pay yet another contractor to do
12 that work again if we needed to fix it. And it
13 was going to bring in new crowd that had no
14 nuclear experience, because we've already trained
15 C.B.N.I. people to some degree to do nuclear work.
16 Well, we're going to start all over because they
17 were going to bring in that Fluor-Daniel to do the
18 work.

19 And then on top of that, he was going
20 to start paying them -- on average, we spent about
21 50 million dollars a month on what we call the --
22 the T and M. And that was like a cost-plus part
23 of our contract. Well, he was going to spend
24 with -- Westinghouse was going be the -- like
25 the -- the face of both the design agent and the

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1 construction now. And then they were going to sub
2 out the construction part.

3 He wanted to pay them a hundred
4 million dollars a month starting in January. That
5 would have been the month that they would have
6 been the least productive. They wouldn't even
7 have a full construction staff when the most we've
8 ever paid for construction was 50 million. And
9 Kevin was going to double that to a hundred
10 million and he was going to pay that for five
11 months straight in a row when you are going to be
12 the least productive since I've been at the
13 project for six years. And so he was going to
14 spend 500 million dollars January through May.

15 And as I understand it, he never did
16 quit spending a hundred million dollars a month.
17 But I didn't know that was going to happen. But
18 he was going to pay a hundred million dollars a
19 month, January through May, which coincidentally,
20 Westinghouse needed 500 million dollars every year
21 just to make its payroll. And coincidentally,
22 Westinghouse was also almost going bankrupt. And
23 coincidentally, that lines up beautifully with
24 when SCE&G calculates its new revenue requirements
25 so it can file to be able to put those revenue

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1 requirements in in October. The cut off is May
2 31st with an estimate for June.

3 Well, if every month was a
4 hundred-thousand dollars, January through May,
5 you're going to estimate June as a
6 hundred-thousand dollars. So you've just made it
7 so that you're going to have your best revenue
8 requirement you've ever had because you've doubled
9 your revenue requirement from 50 million to a
10 hundred million.

11 And that's when I said this just
12 stinks. I mean, something's bad wrong. Why would
13 you, trying to protect your rate payers, double
14 how much cash flow you're going to come out of the
15 bank with?

16 Q Okay. I got -- so thank you for that.
17 I appreciate your answer. Let -- let me ask you
18 some follow-up questions about several aspects of
19 that. Were you aware that there -- as part of the
20 negotiation that you described for the amendment,
21 there was an effort to reach an agreement on an
22 updated milestone payment schedule, a revised
23 milestone -- construction milestone
24 payment schedule?

25 A Yeah, I was aware of that.

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1 **Q** **Okay. Okay.**

2 A But I mean, the milestones made no
3 difference. They came up with the most stupid
4 milestone --

5 **Q** **And they --**

6 A -- that made no -- I mean, it was like
7 so you picked up a piece of metal with a crane, it
8 was no indication of progress on the construction.

9 **Q** **And -- and did you understand that the**
10 **parties at the time that the amendment was executed**
11 **in October of 2015 had been -- were unable to agree**
12 **on a revised construction milestone payment**
13 **schedule? Did you --**

14 A At what point?

15 **Q** **In -- in October of 2015 when the**
16 **amendment was executed, there was no agreed-upon**
17 **revised construction milestone payment schedule.**
18 **Did you know that?**

19 A Well, why would you sign an amendment,
20 then?

21 **Q** **Well, were you aware -- so are you**
22 **saying you were not aware that the parties had not**
23 **agreed on a new revised construction milestone**
24 **payment schedule in October of 2015?**

25 A No, I don't know that detail.

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1 **Q Okay.**

2 A But why -- there raises another
3 question. Why would you agree to pay him a
4 hundred million dollars if you can't even agree of
5 something that simple?

6 **Q Okay. Were you -- were you --**

7 A I mean, let me ask you this, did they
8 have the engineering design, a date for that to be
9 complete? Because I mean, at that point, the
10 design still wasn't complete. Why would you
11 double how much you are going to spend on somebody
12 who still hadn't completed the design on that
13 plant?

14 **Q Were you aware that the parties agreed**
15 **that they would continue to negotiate to try to**
16 **reach agreement on a -- on a new, revised**
17 **construction milestone payment schedule, but were**
18 **unable finally to reach an agreement and actually**
19 **had to litigate that issue in front of the dispute**
20 **resolution board in October -- I mean, in August of**
21 **2016?**

22 A The des--- the -- whatever the board
23 is you just mentioned, that's just B.S. That's
24 just internal and all they are going to do is just
25 push paper around. They've tried that a half a

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1 dozen times. Those people couldn't negotiate and
2 agree to anything. C.B.N.I. and Westinghouse, it
3 was their way or no way. SCE&G never moved not an
4 inch to get anything out of Westinghouse.

5 **Q** **Did you -- did anyone explain to you**
6 **with respect to the hundred million dollar monthly**
7 **payments that those payments were being made on an**
8 **interim basis until a revised construction milestone**
9 **payment schedule could be implemented? Did anyone**
10 **tell you that?**

11 A So did they make the hundred million
12 all the way through until they closed the project
13 down?

14 **Q** **My question is, did anyone tell you**
15 **that?**

16 A What -- what -- ask it again.

17 **Q** **Did anyone tell you that the monthly**
18 **payments that you just described, the one hundred**
19 **million dollar monthly payments that were scheduled**
20 **to commence January 1 of 2016, were designed to be a**
21 **set of interim payments --**

22 A Absolutely, I knew that. But why
23 would you set an interim payment that's double
24 what you've ever paid?

25 **Q** **Did --**

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1 A It doesn't matter if it's interim or
2 not. That's cash.

3 **Q Did you understand --**

4 A And your customers are going to pay
5 it.

6 **Q Did you understand that --**

7 A At 12 and a half percent on top of it.

8 **Q Well, we'll get to that in a minute.**

9 **Did you understand that the parties had agreed to a**
10 **true-up at the end of the --**

11 A Yeah, I knew all about the true-up.

12 **Q Okay. Let me finish answering my**
13 **question before you answer. We --**

14 A Okay.

15 **Q We agreed to do that --**

16 A We agreed on that. Ground rules.

17 **Q All right. Ground rules. Do you -- do**
18 **you -- did you know that at least SCE&G believed and**
19 **understood that at the -- at the end of the interim**
20 **period where those hundred million dollars payments**
21 **were being made, that there would be a true-up**
22 **where, depending on who had underpaid or overpaid on**
23 **those hundred million dollar payments versus the**
24 **work that had been done, that there would be a -- a**
25 **true-up at the end of that interim payment?**

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1 A Absolutely.

2 MR. COX: Object to the form.

3 By MR. BALSER:

4 **Q Okay. It wasn't a very good question,**
5 **so let me ask it again. I'll -- I'll -- I'll**
6 **take -- I'll take a cue from my -- my opponent here.**
7 **All right. Let's break it down into like bite size**
8 **pieces. That might be easier.**

9 A Well, I mean, I got the question. I
10 mean, I -- whoever negotiated that, I mean, I
11 can't help but say, that was the dumbest thing I
12 could ever imagine somebody coming up with.
13 That's why I say, that's when I said, I will not
14 go any further with this group.

15 **Q Okay. Just -- I just wanted to --**

16 A I just won't be associated with it.

17 **Q I understand your view.**

18 A That's what you asked me.

19 **Q I did.**

20 A What is my view?

21 **Q I did.**

22 A I said that's it.

23 **Q I did.**

24 A I'm either working with frauds or
25 dumbasses.

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1 Q Okay. I -- you -- I got it. I've --
2 you've expressed your view and I did ask you for
3 that. Now I want to -- I -- I'm asking a different
4 line of questions now, which is about what you were
5 told and what you understood at the time. Okay?

6 A Okay.

7 Q So I got your -- I -- loud and clear on
8 your viewpoint.

9 A Okay.

10 Q I got that.

11 A Sorry.

12 Q Okay? What I'm asking you, though, is
13 did -- and I -- I know the answer, but I want to
14 make sure our record's clear and so does my
15 opponent. Did you understand that at the end of
16 this period of time for which the hundred million
17 dollar monthly payments would be made, that there
18 would be a true-up as between the owners and the
19 consortium?

20 A Absolutely.

21 Q Okay. Now, with respect to the -- so I
22 understand the first part of your -- your concern or
23 your criticism of the deal. And that is you are
24 paying them a hundred million dollars a month where
25 they've never spent more than 50 million.

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1 A Right.

2 Q **I got that?**

3 A Right.

4 Q **Okay. The second part of your**
5 **criticism, as I understand it, is that these --**
6 **these new monthly figures, which are higher than the**
7 **historical ones, would then be put into a revised**
8 **rate proceeding.**

9 A Right.

10 Q **Do you know whether in 2016 the company**
11 **sought to include in its revised rates the payments,**
12 **the hundred million dollar payments?**

13 A I don't.

14 Q **Okay.**

15 A But in December -- or in November,
16 that was my expectation based on history and based
17 on what I heard in negotiations. And that's when
18 I told Kevin -- or Jimmy Addison on the phone when
19 I was at the -- my nuclear office that I would not
20 lie for the company. And then six weeks later,
21 when I had an opportunity to share my concerns
22 with Kevin and he called me back for a follow up
23 to tell me what he was doing about it, and the
24 follow up that he was do--- doing was absolutely,
25 again, ludicrous. And that's when I knew I was

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1 dealing with somebody who was a snake in the
2 grass.

3 And at that point, he gave me a letter
4 that spelled out why he was putting me on special
5 medical leave and that he was concerned about my
6 health, because granted, I had lost 70 pounds.
7 But I couldn't stay with that company. And so I
8 resigned.

9 Q And if -- if -- just let me ask one more
10 question about the hundred million dollar payments.
11 If the -- if the hundred million dollar payments
12 were not included as recoverable costs in the
13 petition filed with the P.S.C. in 2016, then those
14 costs would not have been passed on to rate payers.
15 Isn't that right?

16 A Right.

17 Q Now, all right, let's -- you want --
18 let's talk --

19 A Ju--- I mean, those costs. I mean,
20 other costs would have been --

21 Q All right.

22 A -- passed on. I'm probably wrong, but
23 go ahead.

24 Q Let -- let's -- let's talk about what
25 you were just describing to me, which is the -- the

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1 **circumstances that led to your resignation. Now, as**
2 **I understand it, you -- after you -- you have**
3 **expressed to me, I think clearly, what your concerns**
4 **and views were about the amendment. Did there come**
5 **a time in early 2016 where you asked Mr. Marsh**
6 **whether you could become a direct report to him?**

7 A I did, because I knew that Jimmy and I
8 did not see eye to eye. And I questioned whether
9 or not there was some -- well, I mean, now I know
10 that it was being orchestrated from Kevin. But
11 for probably the last two years that I was on the
12 project, I felt as if Jimmy Addison and Jeff
13 Archie were creating a hostile work environment
14 because I was constantly being reprimanded.

15 And then there was an opportunity for
16 Kevin to help an employee who was being
17 inappropriately demoted in pay. And I reached out
18 to Kevin, and the Kevin that I knew had the
19 appropriate response. And then given I guess -- I
20 don't know, it was probably about two weeks after
21 I talked to him, Kevin turned my request around
22 and put it back in the hands of Jimmy Addison and
23 Marty Phalen, the liar who said that he went to
24 college and had really only graduated from high
25 school, who was over H.R. And instead of having

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1 the person's position retitled, he had her pay cut
2 by a little over 30 percent and said that that was
3 legal.

4 Well, I didn't tell anybody, but I
5 actually went to an outside legal counsel who
6 specialized in H.R., supposed to be one of the
7 best in Columbia, and confirmed that that was
8 inappropriate and that she could sue the company
9 for it.

10 Q This is Rhonda Ruff? This is the Rhonda
11 Ruff situation?

12 A Yes. Yes.

13 Q And --

14 A And I was really disappointed that
15 Kevin didn't overrule what Jimmy and Marty Phalen
16 had done because I know in the history I've been
17 with the company, that's not the normal -- that's
18 not the normal way to handle somebody after
19 they've had their job reclassified. But --

20 Q Your --

21 A -- that was his decision. And so
22 nothing I could do about that.

23 Q Fair to say you were very unhappy with
24 that decision?

25 A For her personally, yes. I mean, she

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1 had been in the job for some 30-something years
2 and I knew that her job, what she did, was much
3 more technical than what she had portrayed when
4 she was interviewed.

5 **Q Who made the decision to reduce**
6 **Ms. Ruff's compensation?**

7 A Jimmy Addison and Marty Phalen.

8 **Q And did you resent them for doing that?**

9 A I didn't resent them. I just
10 disagreed with it.

11 **Q There's an e-mail that you -- you sent**
12 **to Mr. Addison that I wanted to ask you about.**

13 MR. BALSER: Yeah. Tab 12.

14 (Exhibit number 27
15 marked for identification.)

16 By MR. BALSER:

17 **Q This is an e-mail string between you and**
18 **Jimmy Addison. The first e-mail is from you to**
19 **Jimmy on November 12th, 2015. I'm sorry. No, it's**
20 **not. It's -- yeah, it is, from Novem--- an e-mail**
21 **from you at 6:26 a.m. to Jimmy Addison where you**
22 **said, hey, Jimmy, I've had some time over the last**
23 **week to do some real soul searching and I would like**
24 **to ask you for some of your time so I can apologize**
25 **and explain why my behavior and how my perspective**

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1 over the last six months has gotten screwed up and
2 then genuinely apologize for how I've lost my
3 perspective and all semblance of humility in
4 allowing myself to become so self-righteous. I have
5 given a lot of thought to what you said to me on the
6 phone several weeks ago and you have been right. I
7 would estate -- and that might mean appreciate --
8 the opportunity to right my wrong and extend my
9 appreciation to you and Kevin for allowing a
10 personal crisis to consume me and take up a war
11 against the very people that have afforded me a
12 career that exceed anything in my wildest dreams.
13 What were you -- what was going on there? What were
14 you talking about? What was the communications that
15 you and Mr. Addison had that you were referring to
16 there?

17 A Yeah, I don't know. November the
18 12th. Yeah, I don't know.

19 Q And then he -- he responded to your
20 e-mail saying glad to meet with you and hear your
21 perspective, et cetera. And then you responded
22 later that morning -- these are all e-mails early in
23 the morning, all before 7:00 a.m. on the 12th of
24 November, 2015. You say I would appreciate your
25 willingness to meet with me early Monday morning. I

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1 just hate to ask you to come in early on a Monday
2 after being out of town this week and then having a
3 packed schedule on Monday. My health is going to be
4 fine, not to worry about that. I need to apologize
5 for losing the very virtue I've always wanted to be
6 known for having. And with much thought and
7 reflection, I see that I've become a self-righteous,
8 hard person that I never wanted to be. And that --
9 and that will only serve to make the rest of my life
10 one of regret. I owe you an apology and need to
11 take ownership for more inappropriate behavior and
12 perspective. I need to eat some humble pie as you
13 are correct on so many fronts.

14 What -- what -- what was it that
15 Mr. Addison had said to you that you, upon
16 reflection, determined was correct and that you
17 wanted to apologize for?

18 A I don't know.

19 MR. BALSER: Let's take a short break.
20 I may be able to wrap this up.

21 VIDEO TECHNICIAN: Off the record at
22 2:28 p.m.

23 (Whereupon, a break was taken
24 from the proceedings.)

25 VIDEO TECHNICIAN: On the record at 2:34

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1 p.m.

2 By MR. BALSER:

3 Q Ms. Walker, has anyone representing the
4 office of regulatory staff indicated to you that
5 they intend to call you live at the Public Service
6 Commission proceeding?

7 A No. No.

8 Q Has anyone indicated to you that they
9 intend to subpoena you to appear at that hearing?

10 A No.

11 Q Have you agreed with the office of
12 regulatory staff, with their lawyers, to voluntarily
13 accept a subpoena to appear at that hearing?

14 A No.

15 MR. BALSER: Those are all of the
16 questions I have. Thank you very much for your
17 time.

18 THE DEPONENT: Uh-huh.

19 E X A M I N A T I O N

20 By MR. HALTIWANGER:

21 Q All right. Mrs. Walker, Dan Haltiwanger
22 again. We met last time --

23 A Yeah.

24 Q -- we went through this. I've got some
25 follow-up questions to Mr. Balser. And it may be a

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1 little disjointed because I'm going to try not to go
2 over anything I went over last time or anything he's
3 covered today.

4 A Okay.

5 Q So I apologize if sometimes we jump
6 around. Earlier, you -- you -- you had mentioned
7 that you had recently reviewed the redacted version
8 of your testimony to the P.S.C. Is that correct?

9 A No, it was the redacted --

10 Q Oh.

11 A -- transcript from here.

12 Q Deposition filed at the P.S.C.?

13 A Yeah. Yeah.

14 Q When you reviewed it, were there any --
15 any things that you testified about that you felt
16 were either incorrect or needed to be clarified?

17 A No. I mean, it was redacted stuff, so
18 I couldn't read everything. So --

19 Q But nothing jumped out at you --

20 A No.

21 Q -- as, oh, I -- I didn't mean to say
22 that or --

23 A No.

24 Q -- I should have said that some way --
25 some way else? Since your last deposition, have you

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1 **talked to any employees of Santee Cooper?**

2 A No.

3 **Q Earlier, we -- you were asked a lot of**
4 **questions about the E.A.C. team or the SCANA**
5 **E.A.C. team, as I referred to it.**

6 A Right.

7 **Q And the E.A.C. stands for estimated**
8 **completion?**

9 A That's right.

10 **Q And it's my understand that the SCANA**
11 **E.A.C. team ultimately put together a -- a**
12 **presentation for SCANA's management. Did you --**
13 **were you aware of that?**

14 A Yeah, I think there was a PowerPoint
15 presentation.

16 **Q Did you see the PowerPoint?**

17 A Yeah, I'm sure I did.

18 **Q Were you there when it was presented to**
19 **management?**

20 A Yeah.

21 **Q Who would have been there that would**
22 **have seen the presentation, if you recall who would**
23 **have been there --**

24 A I can't remember.

25 **Q After the presentation was given, did**

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1 **you have any discussions with the E.A.C. team**
2 **members about how the presentation went?**

3 A I can't remember.

4 Q **Do you recall any discussions with**
5 **anybody from management about the -- the**
6 **presentation?**

7 A I just can't remember.

8 Q **After the E.A.C. team had done its work**
9 **and -- and made that presentation, in your**
10 **experience on the project, did you ever have any**
11 **reason to doubt the overall conclusions that the**
12 **E.A.C. team came to?**

13 A No.

14 Q **Did you ever become aware of any reason**
15 **to believe the completion estimate of WEC as opposed**
16 **to the E.A.C. team?**

17 A Can you repeat that again?

18 Q **Yeah, did you ever become aware of any**
19 **reason to believe the estimated completion numbers**
20 **Westinghouse supplied as opposed to the SCANA E.A.C.**
21 **team?**

22 A I mean, I never felt good about the
23 WEC number. You know, I -- I know that in the
24 discussion, there was mention that they thought
25 that they could -- there was thought that on a

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1 second unit, you could build deficiencies, because
2 you had built one, you could build the second one
3 more easily because you've done it once. But my
4 experience when I was on the project, they were
5 actually working on the second unit. And I didn't
6 ever see a P.F. of 1.15 or anything less than the
7 1.15. They were always well above a 1.15, even
8 when they were working on the second unit.

9 So the logic of you've built one and
10 now you're going to build the second one, you're
11 going to be better on the second one, I had -- had
12 not seen any evidence of that improvement on the
13 second unit, even though they had started the
14 second unit. So something pretty dramatic was
15 going to have to happen to have that improvement.

16 **Q Well, did -- did anybody at -- at SCANA**
17 **management, after the presentation, did anyone ever**
18 **tell you they thought that the SCANA E.A.C. team**
19 **had -- had done it wrong?**

20 A No, never got any feedback like that.
21 Matter of fact, Jimmy Addison agreed with my
22 logic. I mean, I think I read something -- or I
23 thought we read somewhere where he had put in
24 writing that he agreed with it, but he had been --
25 but he had agreed with the others to go with the

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1 WEC number, that I should bring it up in the -- in
2 the meeting in the morning.

3 **Q Okay.**

4 A Or that's when I put -- when I sent an
5 e-mail to Keller. And that's when I said, well,
6 that would be like suicide for me.

7 **Q Okay. At the time of the 2015 testimony**
8 **we've been talking about today that you were going**
9 **to give to the P.S.C., had SCANA begun the process**
10 **of negotiating the fixed -- fixed price contract?**

11 A I don't think so. But they may have
12 preliminary discussions between the senior
13 executives that I might not have been privy to at
14 that point.

15 **Q Well, what is your understanding of --**
16 **of when -- or when did you first become aware of the**
17 **negotiations for the fixed price contract?**

18 A I think it was probably the first time
19 I heard anything about it was maybe in August.

20 **Q Of 2015?**

21 A 2015.

22 **Q And -- and who would you have gotten**
23 **that information from?**

24 A I think that we started getting
25 requests through William Hudson who was in the

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1 corporate planning group. And he was getting
2 requests from Kevin Marsh for data.

3 **Q And this would have been around the**
4 **August 2015 timeframe?**

5 A I think so.

6 **Q In general?**

7 A Yeah, I think so.

8 **Q Well, let me ask you, in -- just to be**
9 **clear on it, did anyone in SCANA management tell you**
10 **that they were using the numbers they used in the**
11 **2015 testimony to the P.S.C. because they truly**
12 **believed that WEC -- WEC's numbers were accurate?**

13 A The only thing that I heard them say
14 was Kevin Marsh said that he had something that
15 supported the WEC numbers in writing from
16 Westinghouse and that that was the basis that he
17 wanted to use those numbers.

18 **Q Have you ever made a presentation to the**
19 **SCANA board of directors?**

20 A Yes.

21 **Q When would that have been done?**

22 A In the fall of 2015.

23 **Q And what was the topic?**

24 A They wanted to know -- have an
25 overview of what controls that their finance team

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1 had in place for the project, for invoice
2 controls.

3 **Q Did you prepare any materials for that,**
4 **like a PowerPoint?**

5 A No, I -- no, I didn't.

6 **Q Okay.**

7 A I just talked, you know, from my notes
8 from -- that I had made for myself.

9 **Q And do you -- do you -- would you still**
10 **have those notes, by any chance?**

11 A No. I gave them lots of examples of
12 where we found large gaps and mistakes. It was --
13 it should have been an ear full. It should have
14 raised concerns. That was what I attempted to do.
15 And I got no follow up. And that was -- as I
16 understand it, this is third hand, but the audit
17 committee chairman made a comment to the entire
18 board and all of the senior executives about how
19 much the audit committee enjoyed the presentation,
20 I call out Walker especially because of how
21 brutally honest she was in her presentation.

22 And my take on that was that that was
23 probably a warning sign to members of the board
24 that we got a problem and her name is Carlette
25 Walker, because you don't usually refer to

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1 something as brutally honest in a flattering way.
2 So I -- I think that that was an indication that
3 we've got somebody that's too honest and is not
4 playing the -- the game that they wanted.

5 **Q And can you -- can you elaborate on**
6 **what -- what some of the red flags you think would**
7 **have been that would have -- that's part of your**
8 **presentation for the board?**

9 A People charging hours and not being at
10 the site. Gasoline not being in -- in control.
11 So we were pretty much fueling every car coming on
12 site because there were no key controls over the
13 gasoline. You know, things like that where, I
14 mean, they would tell us that they only -- that
15 the fuel tank that -- just like -- it looked just
16 like a gas station -- that only people that had
17 key fobs that were authorized
18 C.B.N.I. construction vehicles could buy -- or
19 fill the trucks up, or their cars.

20 **Q Uh-huh.**

21 A When we go in and do the audit, there
22 is no key fob. Anybody can pull their car up and
23 fill their car up. And everybody did. And you
24 know, we're paying for that gasoline. And that
25 might sound petty, but that's just an example

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1 of -- of the lack of control. And if that's your
2 attitude about everything, then, you know, the
3 whole city of Pomaria is just walking off with
4 gasoline and everything else that they want at our
5 expense. And so to me, that's just an indication
6 of a culture that is just not managed at all.

7 **Q Okay.**

8 A And so I used examples like that of
9 some of the audits that we've done where they've
10 described a system that's, you know, really nice,
11 got all the control features that you want, but
12 then when you go walk out in the field, you find
13 there's not a control in place.

14 **Q Switching to the -- the E.P.C. contract,**
15 **that -- that was already in place when you got to**
16 **the project?**

17 A Yes.

18 **Q And my understanding is that the**
19 **E.P.C. contract with Westinghouse put the vast**
20 **majority of the costs associated with labor on the**
21 **project in a cost-plus relationship?**

22 A That's right.

23 **Q What controls, if any, did you**
24 **understand were in place to allow SCANA to control**
25 **the cost of labor on the project?**

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1 A I don't think there were any controls
2 in place. I mean, we -- they -- they hired
3 whoever they wanted to, and if the work wasn't
4 there to be able to be done, they just sat around.
5 I mean, that was one of my biggest pet peeves,
6 it's like you're bringing all these people on
7 board, but you're not being able to bring the raw
8 material in because production can't produce the
9 modular assembly units that are supposed to be
10 lifted and welded into place because the design's
11 not complete. You can't fabricate these modular
12 units if the design is changed and when they are
13 trying to fabricate the stuff.

14 So to me, it always kept spinning
15 around the design. And the design was supposed to
16 be completed at the beginning of the project.
17 When I left in 2016, the design still wasn't
18 complete. So it's like you can't build something
19 that you can't finish the design on. And I --
20 that was my whole problem, to say, well, what --
21 every time I turn around, all I kept hearing about
22 was the design is changing. And so the welding
23 can't be finished if your design is still -- isn't
24 finished. You know, they are welding stuff
25 together. Well, you can't unweld. Or if you do

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1 unweld, it's costing you a fortune.

2 And then you have people on site who
3 are working on fixed cost parts of the unit. And
4 then you've got people over here that are working
5 on a cost-plus. And so you've got them all
6 intermingled and it's like, well, who's -- who's
7 keeping up with who's -- on the fixed price piece
8 of the equipment versus those over here that were
9 getting, you know, charged cost-plus? And you
10 could never get that stuff straight because it was
11 all about, you know, wherever we can get the work
12 done, let's get it, you know, shipped to wherever.
13 And it's like, well, this all makes a big
14 difference.

15 If you've got, you know, 400 people
16 over here working on a fixed price piece of
17 equipment that was supposed to be done in Lake
18 Charles, you know, we need to segregate those
19 people, put up a fence and make it so they got to
20 go through a -- a gate where you got to, you know,
21 clock in or sign in, whatever. They wouldn't
22 listen to me for anything. So well, hell, I mean,
23 I can't do anything with this.

24 So I mean, I tried, but I mean, if I
25 wanted to put up a 2,000 dollar fence with a --

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1 you know, a key to go through so you could keep up
2 with who was leaving the fixed cost area, you
3 would think I was asking to build the wall across
4 the border to Mexico.

5 **Q So is it fair to say that before the**
6 **negotiations began for the fixed price contract,**
7 **there were discussions about the problems associated**
8 **with the labor cost being on a cost-plus**
9 **relationship with Westinghouse?**

10 A Oh, yeah.

11 **Q What do you -- describe as best you can**
12 **what you recall about those types of conversations.**

13 A Well, I mean, the -- the primary
14 indicator of an issue was that P.F. factor. I
15 mean, every single month, I would raise my hand
16 when we were having those monthly project review
17 meetings. And I would stop them when they would
18 bring up the P.F. factor and I would raise
19 questions about, so what are you doing to make
20 changes in the P.F. factor? And before I would
21 even get the first question out of my mouth, every
22 single meeting, Ron Jones, my contemporary that
23 was the V.P. over construction, would cut me off
24 and tell me that I needed to take that question
25 into another forum, that this was not the forum to

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1 be able to ask that question. And so I would get
2 cut off every single month. And then when I would
3 have meetings with Kevin Marsh, the C.F--- or the
4 C.E.O. of the company, every single time I would
5 bring in the big change orders that worried me,
6 that I didn't think he would know anything about,
7 and I would bring up the P.F. factor -- it would
8 be written in a -- a slide presentation and I
9 would have prior P.F.'s and then the current
10 cumulative P.F. so he could see that thing was
11 just a straight line going, you know, north.

12 And so he could see, it's like the
13 performance is awful and it's just getting worse.
14 And that has to tell you that they are doing less
15 with more. And that's labor is the primary driver
16 in that. And that means you're -- you're not --
17 you're not meeting the schedule and your cost is
18 going through the roof.

19 **Q Well, I -- as part of those discussions,**
20 **did anyone ever bring up that it was a mistake for**
21 **us to enter the E.P.C. contract with the labor risk**
22 **being on SCANA?**

23 A Nobody ever said that that was a
24 mistake. I think it was just a matter of -- well,
25 I shouldn't express my opinion on something like

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1 that, but somehow or another, somebody needed to
2 drive Westinghouse to get the -- the plant design
3 done. I think that was -- that in itself was a
4 huge issue. And then your other issue was a
5 construction company in today's environment trying
6 to build under nuclear standards when you hadn't
7 built in nuclear in 30 years, and the industry,
8 not knowing how to build in N.R.C. standards today
9 was a huge learning curve.

10 And I'm sure that Plant Vogtle, the
11 two units down there, they have ended up bearing a
12 lot of costs because of the N.R.C. regs. You
13 know, and the companies in production, they --
14 they just haven't built under those regs in 30
15 years, so -- and they are tight.

16 **Q Uh-huh. All right. The last time we**
17 **were together and earlier with Mr. Balser, there**
18 **were some discussion about the fixed price contract**
19 **negotiation. And I -- in your prior deposition, you**
20 **mentioned that that was the last straw for you.**

21 A Yeah.

22 **Q How that contract was negotiated. And**
23 **you've gone over some of that today. What -- can**
24 **you elaborate a little bit more on what your role**
25 **would have been during the negotiations of the fixed**

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1 **price contract?**

2 A I mean, my role was strictly a support
3 role. When we were working through some of the
4 modeling, we had Westinghouse -- I don't know if
5 the guy was from Westinghouse or C.B.N.I., but
6 anyway, they brought in a guy that was an
7 accountant. I don't know if it was just a ploy.
8 You know, I just -- I question whether there was
9 really any negotiating going on or if that was
10 just a -- a drama for us to watch so we would
11 think there was a negotiation. I mean, I'm that
12 cynical about the whole thing at this point. But
13 they brought in a guy from one of the two
14 companies. He acted like he was stupid to the
15 process, but they had insight into the general
16 ledger.

17 So I mean, I don't know what this
18 guy's story was, but anyway, so the executive left
19 this guy with us. He left him with me, Skip Smith
20 and I think Kevin Kochems was in the room. So we
21 had him for maybe about 45 minutes by himself.
22 And in that little bit of time, I was able to ask
23 him a few questions. And I finally got out of him
24 that the -- the loss that was being taken on
25 C.B.N.I. was being recorded in Westinghouse's

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1 books. So that was supposedly, you know, real
2 insightful for us during the negotiations because
3 that was a couple -- I think it was like 2.2
4 billion for some reason keeps sticking in my mind
5 because we were trying to figure out, so who is
6 taking the hit for C.B.N.I. being able to walk off
7 the project?

8 And so we were trying to figure out,
9 where is -- where is that in this negotiation?
10 And -- but like I said, I don't know if -- if that
11 was real or not because it's just -- it was too
12 coincidental that, you know, they brought him in
13 right in the middle of all of these scenarios we
14 were running. He -- he was smart, but he also
15 played dumb. So I don't know if he was just
16 planted in there so that we could get the
17 satisfaction of feeling like you were able to ask
18 a couple stupid questions and then he just out --
19 you know -- you know, out comes the rabbit that
20 you wanted. It's like, okay, thank you, and then
21 he, you know, goes about his business, maybe went
22 back to Pittsburgh. I don't know.

23 But anyway, our role was very much
24 support role. Anything that Kevin was trying to
25 understand or -- you know, about like a lot of the

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1 outstanding commercial issues, we had a list of
2 probably -- there were at least 30 to 40 items,
3 big items that were -- needed to be negotiated,
4 one of which I think -- I think it was the
5 cyber -- it was the cyber security update got left
6 out. It -- they still couldn't -- they wouldn't
7 throw that in to the negotiation. So it was still
8 an outstanding commercial issue. It wasn't
9 security. It was -- it was the cyber update for
10 the aircraft impact. That was a big update for
11 them to protect the shield building from an
12 aircraft impact.

13 **Q** **Uh-huh.**

14 **A** But we were helping him to understand
15 all of those different commercial issues that had
16 come up over I guess probably five years that no
17 matter who you put in the room, we couldn't come
18 to a reso--- a resolution over. They wouldn't
19 give. We wouldn't give. So it got to the
20 executive level. The executives had even tried to
21 resolve these commercial issues two or three times
22 and walked away nothing settled. So in this final
23 amendment, they were supposed to settle all of
24 those.

25 **Q** **Well, in -- in your role as**

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1 **supporting -- in supporting these negotiations, I --**
2 **I would assume that if the decision is to stick with**
3 **what we have or -- or switch to a fixed price**
4 **option, part of what SCANA would want to know is,**
5 **well, what's the cost under our current situation**
6 **versus what would be the cost under what's being**
7 **offered under the --**

8 A Oh, yeah, we did all of those analysis
9 for him so we could show him, you know, given the
10 P.F. factor, this is what this is going to run us,
11 this is what we're -- you know, we ran those same
12 E.A.C. models with, you know, higher P.F.'s, lower
13 P.F.'s. You know, we looked at the fixed price,
14 you know, ran scenarios with that fixed price,
15 given change orders, you know, tried to identify
16 where we thought change orders could come in. You
17 know, we ran all kind of different scenarios that
18 by himself, not having a construction background,
19 he wouldn't have been able to come up with. So I
20 mean, we -- we gave him everything he could
21 possibly come up with for him to be able to make a
22 decision, do you want to take the risk off the
23 table and try to go with the fixed price and pay
24 the premium or, you know, would you want to go
25 with a -- still have a cost-plus in there and bear

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1 some of the risk by, you know, having a cost-plus?

2 So I mean, ultimately, you know, I
3 mean, I gave my opinion plenty of times. But
4 ultimately, at the end of the day, you know, he
5 and Steve and Jimmy had to make a call and make a
6 decision. And he certainly didn't have me make
7 the decision. And he didn't make the decision at
8 that point. I mean, he still had an option and
9 he -- he still had some run time to be able to
10 finally make that decision.

11 **Q The -- the E.A.C. models that you were**
12 **running, were those E.A.C. models based off of the**
13 **work that had been done by the E.A.C. team?**

14 A Oh, yeah. I mean, we started with
15 those and then we worked -- worked them out. I
16 mean, those files ended up being ginormous because
17 we had so many different versions of them, you
18 know, with different variables in there.

19 **Q So during the negotiations for the fixed**
20 **price contract, SCANA management was relying on the**
21 **E.A.C. numbers that were generated by the SCANA**
22 **E.A.C. team?**

23 A Not necessarily the E.A.C. numbers,
24 but the E.A.C. models.

25 **Q Okay. The E.A.C. models?**

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1 A And we could change the variables. I
2 mean, we could change -- I mean, we built those
3 E.A.C. models so that they were like universal
4 models. So you could change the P.F. factors in
5 one spot and you could change all the model from
6 changing just one cell.

7 **Q Okay.**

8 A So I mean, we made it so that you
9 could have as much flexibility as you wanted from
10 the very beginning, because we knew that this was
11 going to be a tool we were going to be using from
12 hence on because this was going to be an -- an
13 ongoing question as the project continued.

14 **Q And when -- when was the timeframe that**
15 **this was going on compared to the -- the 2015**
16 **presentation to the P.S.C.?**

17 A The 2016?

18 **Q 2015, the -- the --**

19 A Okay, '15. That's right.

20 **Q I -- I'm -- like how -- how many months**
21 **are in between whenever your testimony and Steve**
22 **Byrne's testimony would -- would have been submitted**
23 **to the P.F.C versus when these --**

24 A Oh, right on the heels of it. I mean,
25 it was always -- we were always on fire. I mean,

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1 as soon as we finished the hearing, then the fire
2 started for the E.A.C. I mean, it wasn't even --
3 it was maybe 30 days later. And the next thing
4 you know, we're starting to get questions about an
5 E.A.C. And so that fire starts, I've got to take
6 half the team and put them over there in a
7 separate building so everybody has to double team
8 to be able to keep the work going.

9 Q Well, if --

10 A For the project.

11 Q In the 2015 testimony, and I think
12 Mr. Balser went over some of it with you, didn't
13 Mr. Byrne testify to the P.F.C that the W--- the WEC
14 completion numbers were the best numbers available
15 to use for the project?

16 A Well, he also raised questions about
17 the P.F.

18 Q So you don't think it would be
19 justifiable to use the Westinghouse numbers given to
20 the P.F.C as the basis for your negotiations of
21 the --

22 A Good question. I mean, that's --

23 Q I -- I guess what I'm having an issue
24 with is if SCANA has just testified to the
25 P.F.C. that these are what we believe are the best

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1 **numbers for estimating the cost at completion, why**
2 **wasn't it using those numbers to negotiate the fixed**
3 **price contract?**

4 A Well, I'm not saying it didn't start
5 with the six hundred and eighty some odd thousand.
6 I mean, we might have had models that started at
7 687. We might have had some models that started
8 at a billion-two.

9 **Q Okay.**

10 A I mean, I -- I don't -- I can't
11 remember all of the models that we used.

12 **Q Was there anything new or material that**
13 **came out between the the P.F.C testimony and the**
14 **negotiation of the fixed price contract that would**
15 **have changed the evaluation of Westinghouse's**
16 **numbers?**

17 A No, not that I know of. Nothing
18 stands out.

19 **Q Jumping to a side issue for a second,**
20 **the hundred million dollars a month under the fixed**
21 **price agreement that you were discussing with**
22 **Mr. Balser, did that -- and he asked a question that**
23 **I don't know the answer to, so I'm asking the**
24 **question, if that hundred million dollars a month**
25 **wasn't a part of the 2016 rate application, would it**

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1 **have stayed in A.F.U.D.C.? Where would it have --**

2 A It would have stayed in construction
3 work in progress.

4 **Q Oh, CWIP?**

5 A Uh-huh. And if it stayed in
6 construction work in progress, then it would
7 accumulate A.F.U.D.C.

8 **Q Okay. And I want to ask you some --**
9 **again, a little bit of follow up for what you were**
10 **talking about earlier. Could you explain what -- if**
11 **you believe that some of the elements in the fixed**
12 **price contract deal -- how it could benefit SCANA,**
13 **the company, while at the same time possibly**
14 **disadvantage the rate payers?**

15 A How the hundred-thou--- hundred
16 million --

17 **Q Well, the -- the -- the switch to the**
18 **fixed price contract, including the hundred million**
19 **a month, how -- how does that benefit SCANA and work**
20 **to the disadvantage of a rate payer?**

21 A Well, the way SCANA's -- the way the
22 B.R.A. was set up --

23 **Q Uh-huh.**

24 A -- it -- you were -- you -- as long as
25 you had a budget and you were under the budget,

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1 then you were fine. And the only time you would
2 have to have a hearing is if you were at risk of
3 either the schedule, you being -- coming in and
4 passing the schedule or coming in and you being
5 over the budget. So if you -- if you were -- you
6 know, the budget was fine, the schedule was fine,
7 then you would only -- all you had to do is on an
8 annual basis you could file and tell them how much
9 money had been spent, expenditures-wise, and you
10 could show that those -- that amount of money --
11 and what the company did was they picked I think
12 it was May 31st of every year that they would do a
13 look back for the previous I guess it was 11
14 months. And then they would do an estimate for
15 June. And then they would say as of June 30th,
16 this is our 12 months expenditures.

17 And if that Public Service Commission
18 would approve that 12 months worth of
19 expenditures, then I think it was at October they
20 would approve those as being prudent and allow
21 those to go into rates. And then the first
22 billings that went into bi--- went out in
23 November, the rates would be -- include those
24 expenditures into rates. So the rates in November
25 would go up according to what had been spent for

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1 the 12 months ending June 30th of that same year.

2 So when you -- when they spent a
3 hundred million dollars starting in January of
4 '16, then you would spend a mill--- a hundred
5 million dollars in January, February, March, April
6 and May. So that's 500 million dollars. And then
7 you're going to estimate June another hundred
8 million dollars. So that's 600 million dollars
9 that's going to go into that calculation for June
10 30th of '16. And then you're going to have July,
11 August, September, October, November and December
12 of '15, whatever your real spend was before you
13 negotiated.

14 All right. So you have 600 million,
15 which that's at least double what you've ever
16 spent in that six-month period in any of the prior
17 six month -- those six months in any prior year.
18 So when you go to file that, and the commission,
19 not knowing any different, approves that 12 months
20 of expenditures, then when you roll them into
21 rates in November, you're going to have the
22 highest increase in your rates that the rate
23 payers have ever seen because you've got such a
24 high level of expenditures that are rolling into
25 rates.

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1 And so revenue for SCE&G, come
2 November, when it bills it out, is going to jump
3 up higher than it ever has. And so our company --
4 company's earnings are going to be glorious in
5 November and December, which is going to drive up
6 the stock value. And it's also going to drive up
7 company bonuses that are all tied to earnings.
8 And those that are turned -- are tied to stock.

9 **Q Okay. During the negotiations for the**
10 **fixed price contract, was there ever -- or were you**
11 **aware of any discussions about the impact of the**
12 **switch away from the cost-plus to a fixed price on**
13 **the overall profitability of the project for**
14 **Westinghouse?**

15 A I don't know of any. That -- that
16 might have been something they discussed when they
17 were amongst the senior executives of the two
18 companies.

19 **Q Based on the models, the E.A.C. models**
20 **that your team was running, did y'all ever come to**
21 **any conclusion or observation about whether under**
22 **the price being offered under the fixed price**
23 **contract, the overall project would -- would be**
24 **profitable or unprofitable for Westinghouse?**

25 A See, we were never, ever given enough

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1 information to be able to figure out what they
2 were making. I mean, they never shared enough
3 information for us to figure that out. I know
4 that senior staff misrepresented at a minimum that
5 the Tashiva (ph.) write down -- I guess it was in
6 '15, where they represented to the staff that that
7 had nothing to do with the U.S. nuclear projects.
8 And late in '16 is when several of us found out
9 that it had everything to do with the U.S. nuclear
10 projects.

11 And then in '16 -- I think it was in
12 '16 is when Westinghouse was declaring bankruptcy.
13 And I think it was hard for them to cover that one
14 up because that one was pretty public and in the
15 U.S.

16 **Q Well, let me ask you, were there any**
17 **discussions at SCANA that Westinghouse might declare**
18 **bankruptcy after switching into the fixed price**
19 **contract?**

20 A I don't know because I wasn't there.

21 **Q In the negotiations that you were there**
22 **for, did anybody ever bring up, hey, this might make**
23 **the project unprofitable and Westinghouse might**
24 **declare bankruptcy?**

25 A Never was brought up. I know one of

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1 the big things that they were -- that the
2 executives were concerned about was how low the
3 liquidated damages were on the contract.

4 **Q And you're --**

5 A On behalf of SCANA. So the L.D.'s
6 were super low for a contract the size that they
7 had signed.

8 **Q And who brought that up?**

9 A The senior executives continually
10 talked about that.

11 **Q And when you say senior executives?**

12 A Steve, Kevin.

13 **Q And specifically, the -- the complaint**
14 **was that they did -- they did not believe the --**

15 A The L.D.'s were too low for it to
16 protect the company.

17 **Q Well, weren't they the ones negotiating**
18 **that as part of the -- the deal?**

19 A Well, apparently, they didn't think
20 that they could -- well, I think they tried to get
21 the liquidated damages to be increased, but of
22 course Westinghouse wasn't going to let them have
23 higher liquidated damages, you know, there in the
24 fourth quarter.

25 **Q And -- and why do you think that was?**

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1 A Because I think that they knew that
2 they were subject to being sued for
3 nonperformance.

4 Q And -- and I may -- I may have my timing
5 wrong, but I want to make sure we're on the same
6 page. I think less than a year after the hundred
7 million dollar a month payments were un--- over
8 under the fixed price contract, Westinghouse
9 declared bankruptcy. Is that your recollection of
10 sort of the timeframe?

11 A That's what I think happened. I know
12 it was about 18 months after I resigned that the
13 whole thing was plugged up. And it's kind of
14 like, that's kind of what I expected.

15 Q Well, the -- I guess what I'm -- I'm
16 looking at is, under the fixed price contract, based
17 on historical payments, SCANA paid a lot more in
18 that period between the fixed price contract with,
19 you know, its beginning and Westinghouse declaring
20 bankruptcy than it would have been -- would have
21 paid if it had stepped onto the cost -- cost-plus.
22 Is that accurate?

23 A I don't know. I mean, did they keep
24 paying the hundred million dollars a month for the
25 life of the fixed price contract?

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1 **Q** Well, just if they had made the first
2 **five --**

3 **A** Six months.

4 **Q** Yeah, six months payments, that six
5 **hundred million dollars, would that have been more**
6 **than they would have paid under the cost-plus**
7 **arrangement?**

8 **A** Not for 18 months. For 18 months,
9 they would have spent more than 600 million. I
10 mean, they were -- they were averaging about 50
11 million on construction.

12 **Q** Uh-huh.

13 **A** So for 18 months, I mean, that -- do
14 the math on that, it would be more than 600
15 million.

16 **Q** Do you know what they did -- what the
17 **payments were following the end of the hundred**
18 **million dollar a month payments --**

19 **A** No, I don't know what they did.

20 **Q** Okay.

21 **A** Because I -- I quit in January, right
22 when they would have started the hundred million.
23 So I don't even know what they did with the fixed
24 price option. I'm assuming from what you're
25 saying that they chose the fixed price. But I

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1 don't even know what they did. I don't even care.

2 **Q And as part of entering the fixed price**
3 **contract, did SCANA agree to drop some of its claims**
4 **for outstanding credits that your team had been**
5 **working on?**

6 A I guess they did. I guess they just
7 through them into the negotiated price. The only
8 one that I think was left outside of that was the
9 cyber update for -- it was either secure -- cyber
10 security or either cyber for the aircraft impact.

11 **Q If -- if they did throw that in as part**
12 **of the negotiation, do you know what -- what size**
13 **number we're talking about --**

14 A See, that was the reason that they
15 wouldn't put a number on it, because they were
16 claiming that it was just going to be too hard for
17 them to come up with the price tag. So they were
18 just leaving that with like a question mark beside
19 it. So the sky's the limit on that one.

20 **Q And I'm not -- I'm not the expert on how**
21 **the P.F.C operates. That's other people in the**
22 **room, but your understanding I'm looking for. Was**
23 **money already spent by SCANA on the project treated**
24 **differently when it came to approval of rate**
25 **increases by the P.F.C versus money SCANA was**

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1 **projecting to spend?**

2 A Now, say that again.

3 Q **I -- whenever SCANA would go in front of**
4 **the P.F.C with a budget -- or -- and let me -- let**
5 **me rephrase that. Whenever SCANA would go into the**
6 **P.F.C with a request for a rate increase --**

7 A Under normal circumstances?

8 Q **Start with --**

9 A Outside of this construction?

10 Q **No, on -- on this construction project.**

11 A Okay.

12 Q **Is it -- would money that had been spent**
13 **already be treated differently than money where they**
14 **are saying we're going to need this in the future?**

15 A Absolutely. I mean, only money that
16 has already been spent would go into rates.
17 Expended -- expector--- expected expenditures were
18 just simply estimated budgets so that they would
19 know what -- how much to expect is going to be
20 spent. And they would give it a timeline as to
21 when the money's going to be spent. But you
22 wouldn't -- they would do nothing with it.
23 Nothing would go into rates because you think
24 you're going to spend it. It's just -- you know,
25 it would be like telling somebody, well, the

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1 project's going to cost -- like the first time
2 they went in, I think it was like six billion for
3 SCE&G's share. Well, that -- that's important for
4 them to know that the South Carolinian rate payers
5 are going to spend -- are going to have to pick up
6 the tab of six billion dollars for this base load
7 of generation. And Santee Cooper's customers are
8 going to have to pay, you know, 44.5 billion
9 dollars.

10 Well, when you came in at the last
11 one, it had gone up to -- let's just say 8 billion
12 dollars. They are not paying for 8 billion. They
13 are only paying for maybe three-and-a-half billion
14 right now and they are choking on it. But at the
15 end of the day, if we keep going, it's going to
16 end up being 8 billion dollars. So they are
17 choking now. They are going to be dead by the
18 time we finish billing them eight -- eight billion
19 dollars. There won't be anybody left in South
20 Carolina that can breathe when we finish the bill
21 and it's got eight billion dollars in it.

22 So that's why you would want to know
23 ultimately how -- how -- how much of a choke is
24 this going to be to you, even though you're only
25 billing at -- at -- at the amount you spent to

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1 date. You need to know how much is the big -- the
2 whole going to be. You see what I'm --

3 **Q Yeah. Well, let me ask you, when you**
4 **were at SCANA, were there ever any conversations you**
5 **recall about the potential of abandoning the**
6 **project?**

7 A I never heard them discuss abandoning
8 it. Now, I do -- I take that back. I -- I do
9 remember -- and it might have been -- I don't
10 remember hearing the executives -- the senior
11 executives, the trio at the top.

12 **Q Uh-huh.**

13 A But I do remember there being
14 discussion amongst the engineers and higher level
15 accountants about why do we -- why don't we scale
16 back and just build one unit. That would be a way
17 to make it more palatable and to reduce cost. But
18 that's -- that's as far as that went.

19 **Q Okay. Let me -- let me -- and this may**
20 **be more of a broad, philosophical question, but the**
21 **switch from the cost-plus arrangement to the fixed**
22 **price contract -- or the fixed price agreement, I --**
23 **was that intended to eliminate the financial**
24 **concerns associated with the poor P.F. factors, do**
25 **you think?**

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1 A Probably, to take some of that risk
2 off of the table. To shift that burden to
3 Westinghouse so that Westinghouse would be forced
4 to make the craft, and the production companies
5 that they were having build their modules, make
6 them take ownership of that because that's where
7 so much of the problem was, and then their design.
8 That would force them to do a better job at
9 managing those functions. But you know, the
10 southern project in Augusta started out as a fixed
11 price contract, and it's up to 26 billion.
12 Started at 14. It's at 26. So I don't think
13 fixed price contract gets you very far.

14 **Q But it did get Westinghouse a couple**
15 **hundred million dollars a month payments right**
16 **up front.**

17 A Yeah.

18 **Q Right before they declared bankruptcy?**

19 A Yeah. That was sweet.

20 **Q How did you first hear about the**
21 **decision to abandon the project?**

22 A I think I saw it in the paper.

23 **Q You hadn't had any discussions with**
24 **anybody at SCANA or anywhere that gave you --**

25 A No.

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1 **Q -- a heads up?**

2 A No.

3 **Q Now, what was your reaction to hearing**
4 **about the decision to abandon the project?**

5 A I mean, it was just confirmation of
6 exactly what I had been saying when I quit. I
7 felt like it kind of -- I don't know what's the
8 word that -- kind of confirmed that what I had
9 been saying 16 -- or 18 months earlier was true.
10 I just hate that it took 18 months for it to stop
11 because I feel like it was -- it should have
12 stopped before I quit. I just hate that it took
13 me so long to figure out what was going on.

14 **Q And if -- that's -- that's sort of a**
15 **broad statement. Let me -- let me get you to**
16 **elaborate on that. What -- when you say what was**
17 **going on, how would you explain that to somebody**
18 **that hadn't been sitting in in all these hours of**
19 **your testimony?**

20 A I think at some point, that Kevin
21 Marsh lost control of the project and the greed,
22 and the need to save face made him lose sight of
23 what was important in life, and that is your
24 integrity. And I think part of his problem was is
25 the people he surrounded himself with.

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1 **Q And who in particular?**

2 A Jimmy Addison, Steve Byrne and Marty
3 Phalen. Marty Phalen was known to be just -- just
4 trash and just a bad person. And that was the
5 first person he promoted up on the senior staff.
6 And I mean, everybody across the whole company,
7 when he -- that announcement came out, you could
8 almost hear a hush go across the company. It was
9 like, wow, what does he really look for in his
10 management? And that was a really bad, bold
11 statement when he promoted him because all Marty
12 Phalen did was kiss people's butt.

13 **Q Well, let me ask you -- and again, I**
14 **might be trying to encapsulate a lot of what we've**
15 **been covering today. Before you heard about the**
16 **abandonment decision, did you believe the project**
17 **would ultimately fail?**

18 A Absolutely.

19 **Q And when do you -- would you say you**
20 **first came to believe that SCANA would have to**
21 **abandon the project, either by date or by event that**
22 **you think really led you to that conclusion?**

23 A Whenever I heard the terms of the
24 fixed price contract, that's when I knew, it's
25 like this is never going to work. I mean, when

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1 you got a liar and you got collusion at the top of
2 a company and you've got a construction project of
3 a nuclear plant for the first time in 30 years and
4 they are lying about it, there's no way it's going
5 to be successful because a lie after a lie after a
6 lie, it's just a matter of time before they just
7 start tripping over each other. And everything
8 that they did after I left, I mean, everything I
9 heard, it was just like, oh, my gosh. I mean,
10 they were just like Bozos with every decision I
11 heard that they made. Everything was just like,
12 oh, my gosh.

13 **Q Are there some examples of that you can**
14 **give us?**

15 A I can't remember now. But I mean, it
16 was just like the three stooges.

17 **Q Earlier in your -- earlier today, you**
18 **brought up that you believe that Westinghouse had**
19 **about a 500 million dollar payroll, yearly payroll.**
20 **Do you remember that?**

21 A Yeah.

22 **Q Where -- where would you have gotten**
23 **that number from?**

24 A Kevin Marsh and Steve.

25 **Q And did -- and if that's where you got**

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1 **your information from, is it -- was it your belief**
2 **that part of the fixed price negotiations were to**
3 **guarantee Westinghouse --**

4 A Finance them.

5 Q Well, let me -- let me -- we kind of
6 **spoke over each other. Did you come to understand**
7 **that the reason for the hundred million dollar a**
8 **month payments coming when they did were intended to**
9 **finance the payroll for Westinghouse for a year?**

10 A That's what I thought it was. They
11 couldn't borrow money at a bank. Tashiva (ph.)
12 wasn't going to fund them anymore. And I thought
13 that was Kevin's way of trying to prop them up to
14 be able to keep working on the design for another
15 12 months.

16 Q While you were at SCANA, were you aware
17 of anybody that maybe had worked to possibly game
18 plan a scenario for when -- or if Westinghouse went
19 bankrupt?

20 A I don't know of a game plan that was
21 developed for that, but there could have been and
22 I just wouldn't have known about it.

23 Q In his testimony at the legislature,
24 I -- Kevin Marsh testified that the only reason this
25 project wasn't completed was the Westinghouse

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1 **bankruptcy. Do you have an opinion about the**
2 **accuracy of that statement?**

3 A Well, I -- well, I'm sure that -- that
4 doesn't help the matter, but I mean, I think that
5 the bankruptcy -- I mean, that hurt them, but the
6 reality is that the design should have been
7 completed probably four years ago. And then the
8 bankruptcy of Westinghouse wouldn't have had the
9 impact that it had. So --

10 **Q And why do you say that?**

11 A Well, if you haven't finished the
12 design and you go bankrupt, then you don't have a
13 design to be able to finish building it. So
14 somebody would have to pick up the design in
15 midstream and figure out what needed to be
16 finished. And I don't know enough about
17 engineering to know how difficult that would be,
18 but I would think that would probably be a pretty
19 big challenge. And if it isn't a big challenge,
20 then that even makes it worse because, I mean, I
21 was on the project for six years and they never
22 could finish the design. And if you could finish
23 it pretty quickly, then that's even a worse
24 statement about how bad Westinghouse is. They
25 gave them two different deadlines when I was on

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1 the project, and both of which they blew through
2 those and they still hadn't finished it in 2016.

3 **Q And what were those deadlines**
4 **originally?**

5 A Well, one of them was right after I
6 got to the project in 2009, and then they had
7 another deadline of sometime in 2014.

8 **Q And neither time did they get it done?**

9 A No. I mean, they didn't even have a
10 project schedule, despite what Allen Torres had in
11 front of him when they were in front of the
12 legislative group. I did see that. And he had
13 this big printout. You know, you couldn't see him
14 behind it. I -- I don't think that was the
15 schedule.

16 **Q Well, while working on the project, did**
17 **you ever hear the term critical path?**

18 A Oh, yeah.

19 **Q What does that term mean to you?**

20 A I think that that's the -- the -- the
21 path of things that have to happen to be able to
22 get to the very last step in the construction. So
23 when you follow that critical path, it takes you
24 to the very end of the project and everything else
25 is, you know, ancillary to that critical path.

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1 **Q And do you recall persons on the project**
2 **discussing the critical path for the project?**

3 A Yeah, so I -- I remember them talking
4 about it.

5 **Q Well, what -- what -- in what context**
6 **would it come up and what comments were made?**

7 A I really can't remember much about it.
8 I know that the monthly review meeting -- I don't
9 know if they changed the content, the -- the
10 monthly review meeting because they were so
11 disastrous by showing the metrics. I mean, you
12 could take the metrics, and if they were like
13 showing bad information, they would just change
14 the metric up some so that it would change to
15 being -- they used green, yellow and red. And the
16 metrics were so complicated that it's like I have
17 no idea. I mean, there were like six dimensions
18 on one graph. It's like, oh, god, I mean, who
19 knows what this thing's supposed to tell you. But
20 you could look at the one corner and it would be
21 green. Say oh, good, it's green. But it had like
22 six or seven different things charted on one
23 thing. And if it didn't come out green, then they
24 would just change what they were charting until it
25 turned out green. And then it's like, well, good,

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1 it's green.

2 But who knows what it's supposed to be
3 really telling you. And so they would emphasize
4 like safety for an hour. And it's like, well, I
5 mean, okay, you didn't have any accidents. We
6 don't need to talk about safety for an hour. And
7 then they would talk about some other just
8 ridiculous topic for an hour. And then you would
9 have to buzz through everything else that was more
10 important in a real short period of time, so they
11 would just, you know, go through those really
12 fast. And it was kind of like whoa, whoa, whoa,
13 wait a minute.

14 And then eventually, probably because
15 I kept bringing up questions about P.F., they
16 completely changed the content of the monthly
17 meetings to almost a readiness review for whatever
18 the next big thing was going to happen on the
19 site. And so I -- I got to where, I mean, I'd
20 just come in and go out throughout the day just
21 because it's like it's totally irrelevant to me
22 what lift you're getting ready to do. I've got
23 work I am orchestrating over there, working on the
24 E.A.C. or whatever.

25 And so the meetings just morphed into

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1 something that was really -- not really very
2 important at all. But I mean, they would send you
3 a stack of metrics that were 70, 80 pages, and
4 they would get them to you two days before the
5 meeting. And then everybody in the group was
6 supposed to take their counterparts' metrics and
7 study them and then come to the meeting prepared
8 to ask questions. Well, nobody asked any
9 questions.

10 So it was like I don't even -- this is
11 like silly. It's like out of all of the things
12 going on in this project, we go through these
13 metrics and nobody asks a question except for me.
14 And I'm asking a question about something that's
15 not even accounting. I'm asking something about
16 P.F. factors, that that's more schedule -- and
17 it's why am I the only one that's asking the
18 question? And everybody else is just sitting
19 there.

20 **Q** **All right.**

21 A The same thing happened in the risk
22 management meeting. I was tagged to go to that.
23 I didn't own that. I went into one meeting. And
24 at the end of the meeting, I mean, I was so upset,
25 I blared out, it was like I -- this product is so

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1 wrong, I don't want to be affiliated with it. I
2 want my name taken off of the list of attendees
3 because this thing is such a mess, I don't want my
4 name associated with this product. And the girl
5 that was leading it was like, what do you mean?
6 And I was like, I mean, your risk register, this
7 thing is just like all upside down. None of these
8 are the risks. You know, I started naming off
9 risks. And the next time they got to -- the girl
10 stayed around afterward. She was like, Carlette,
11 I know, I -- it is a mess. I can't get anybody to
12 participate. And it's like, well, I -- I mean, I
13 don't know what you want to do with this, but I'm
14 not going to be associated with a risk register
15 that has just dumb stuff in it. And the
16 construction V--- V.P., at the end, he looks up
17 from his telephone and said, well, obviously, we
18 are -- are disappointed in the risk register.

19 And I -- in a monotone voice, I was
20 like there is something deadly wrong when I'm like
21 upset and the V.P. that owns this meeting, he
22 says, obviously, we are unhappy with this product.
23 And then the next meeting, the V.P. from
24 Westinghouse comes and it's a completely different
25 spreadsheet. And it's like, okay, so I raised a

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1 lot of sand and it did result in something
2 changing, but the person that owns this meeting
3 and this process acted like he wouldn't -- I don't
4 think he would have said anything had I not said
5 something.

6 **Q Uh-huh.**

7 A And so those are the kind of things
8 that were happening to me all the time. And it's
9 like, you know, how much is so -- am I supposed to
10 take? I'm an accountant. These are engineers.
11 You're the V.P. of construction. What is wrong
12 with you? And I mean, he would come into every
13 meeting, just looked relax. I mean, I'm having a
14 damn, you know, hissyfit. And it's like -- and
15 this is how everybody's doing.

16 **Q Okay. Let me -- let me jump to the time**
17 **when Fluor was coming on board. What were the**
18 **circumstances in which you first learned that Fluor**
19 **was potentially going to be coming on to the**
20 **project?**

21 A That was about the same -- no, that
22 was at the time when they negotiated that fixed
23 price contract.

24 **Q And what was Fluor's role going to be on**
25 **the project?**

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1 A They were going to be a subcontractor
2 to Westinghouse.

3 **Q And at the time, did you have any**
4 **opinion about bringing Fluor on board, whether it**
5 **was a good thing or not?**

6 A I -- I mean, I had an opinion about
7 taking all of the C.B.N.I. people off and then
8 bringing a new -- yet another new group of people
9 on there and what kind of a lag that was going to
10 create. And we were going to, you know, bear all
11 of those costs. I thought that was a pretty big
12 change, especially when you're going to pay them a
13 hundred million dollars the first month when they
14 are supposed to be coming on board. It's like
15 that doesn't seem right.

16 **Q Well, prior to Fluor being brought on**
17 **board, do you know if they performed any type of**
18 **estimate for cost to complete themselves?**

19 A Not that I know of. I mean, that was
20 strictly between Westinghouse and Fluor because
21 Fluor wasn't going to be working -- wasn't going
22 to be working for SCE&G. So Westinghouse was
23 going to be billing and paying between Fluor and
24 WEC, not us.

25 MR. HALTIWANGER: Okay. We've been

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1 going for a little while. Why don't we take a short
2 break and then I've got a couple of documents to go
3 over.

4 THE DEPONENT: Okay.

5 VIDEO TECHNICIAN: This marks the end of
6 video number two in the deposition of Carlette
7 Walker. We are off the record at 3:34 p.m.

8 (Whereupon, a break was taken
9 from the proceedings.)

10 VIDEO TECHNICIAN: This is the
11 continuation of the deposition of Carlette Walker.
12 This is video number three, on the record at 3:55
13 p.m.

14 By MR. HALTIWANGER:

15 Q All right. Ms. Walker, I'm -- I'm going
16 to go through a couple of documents, get you to
17 identify them and discuss a few of the issues in
18 them. I'm going to hand you what's been --

19 MR. HALTIWANGER: Here, I'll hand them
20 to you, Danny, and just pass them to your -- to --

21 MR. BALSER: Thank you.

22 (Exhibit number 28
23 marked for identification.)

24 By MR. HALTIWANGER:

25 Q I'm going to hand you what's been marked

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1 **exhibit number 28 and give you a second to look that**
2 **over. And just let me know when you've had a chance**
3 **to read it.**

4 MS. MOODY: What number did you say this
5 is?

6 MR. HALTIWANGER: Twenty-eight.

7 THE DEPONENT: Okay.

8 By MR. HALTIWANGER:

9 **Q Okay. Can you tell us what exhibit 28**
10 **is?**

11 A It's basically a letter or a e-mail
12 from Ken Browne to part of the business and
13 finance team, and including Allen Torres, who is
14 over the construction. And he's expressing some
15 concern about the increase in the P.F. factor.
16 And I think it's primarily the concrete.

17 **Q Well, let me ask you, look -- the date**
18 **of this e-mail is -- or the original e-mail is**
19 **September 11th, 2013.**

20 A Uh-huh.

21 **Q How long had you been on the project by**
22 **that time?**

23 A I got -- I -- I started there I think
24 it was in late August of 2009.

25 **Q And there was an issue with getting the**

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1 **certificate of licensure from the federal**
2 **government --**

3 A Combined operating license.

4 Q -- at that time? Com--- combined
5 **operating license?**

6 A Yeah.

7 Q **When did that finally come through?**

8 A You know, I can't remember. It seemed
9 like it was like maybe in 2014. It might have
10 been -- because -- I -- I know that Ron Clary
11 retired when they got the C.O.L. So that was a
12 day of celebration for me.

13 Q Well, let -- let me go at it maybe a
14 different way. By September of 2013, how long had
15 construction on the project been ongoing? Not the
16 land clearing and site prep, but
17 actual construction.

18 A Say -- say that again. I'm sorry, I
19 was --

20 Q By the time of this e-mail in -- in
21 September of 2013, how long had the construction
22 work on the site been ongoing beyond not just the
23 site prep and lay -- and clearing, but the actual
24 construction?

25 A Construction kind of activity?

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1 Q **Yeah.**

2 A I would say at least five years.

3 Q **Five years? Okay.**

4 A In 2009, when I got there,
5 construction was proceeding. I think they signed
6 the contract in 2007.

7 Q **Uh-huh.**

8 A And by the time I got there, I
9 remember we were negotiating the Bigge crane and
10 that was brought on I think it was in the winter
11 of twenty--- of 2010, they brought that and
12 started putting that together. So they were --
13 they were already doing above-ground construction.

14 Q **Okay. And in the first paragraph, he**
15 **highlights or underlines a sentence, overall**
16 **performance for the month shows a P.F. of 2.52 with**
17 **73,411 man-hours worked and 29,076 earned.**

18 A Yeah.

19 Q **As a result of this poor performance,**
20 **the I.T.D.P.F. has bumped up to 1.25 from 1.22. Do**
21 **you see that?**

22 A Yes.

23 Q **What -- and so we're clear, what was the**
24 **desired P.F. for the project?**

25 A Well, I mean, in a perfect world, it

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1 would be 1.0.

2 **Q Uh-huh.**

3 A And I think that the number that was
4 spoken about earlier was the desire was a 1.15, I
5 think is what they were trying to shoot for for
6 that E.A.C. that was 687 million or whatever. So
7 you can see five years into the project, they were
8 already at 1.25. So -- and that was from a 1.22
9 in one month, they went up to 1.25.

10 And see, what they are showing is they
11 worked -- they -- their clock hours, they had put
12 in 73,000 hours, but of those, only 29,000 were
13 productive hours. So seventy -- it took 73
14 man-hours of -- of labor to be able to actually
15 produce 30,000 man-hours of work. So you are
16 either super slow or either you got 40,000
17 man-hours -- you got 40,000 hours of people just
18 sitting around doing nothing because they don't
19 have the hardware or the materials that are needed
20 to be able to perform their job.

21 **Q Okay. In the second paragraph there,**
22 **about midway down, he writes, unless this trend is**
23 **reversed, we should expect a substantial overrun of**
24 **target price craft labor cost. Do you see that?**

25 A That's right.

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1 **Q Was that a topic of discussion in**
2 **September of 2013?**

3 A It was the whole time I was at the
4 project. That's why I drew that graph like I did
5 and showed that line going straight up -- or
6 straight out, because it was that kind of a curve
7 the whole time I was at the project.

8 **Q And -- and while you bring that up --**

9 MR. HALTIWANGER: Let me get this marked
10 exhibit 29.

11 (Exhibit number 29
12 marked for identification.)

13 By MR. HALTIWANGER:

14 **Q Since we're going to be -- a lot of**
15 **people will be reading this as a transcript instead**
16 **of seeing it, I wanted to mark this as an exhibit.**
17 **Can you tell us what exhibit 29 is?**

18 A It's a very rough draft graph of the
19 P.F. factor from the initial start of the project
20 'til the time that I would have left the project
21 in early 2016.

22 **Q Okay.**

23 A It's not designed to be perfect at
24 all, but it's just a -- a -- a view of how I saw
25 the P.F. factor. And it's just to demonstrate

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1 that I never saw a single month where it went
2 down. It always went up.

3 **Q And for somebody who -- who isn't well**
4 **versed in construction terminology or P.F. factors,**
5 **I -- it -- it seems to me that it's cumulative that**
6 **once you get a bad P.F., in order to get it -- if --**
7 **once you go like -- once you go above the 1.15, you**
8 **don't just have to bring it down to 1.15. You have**
9 **to bring it below that to actually bring the average**
10 **down to where you want it on the project.**

11 A That's right. If you've got a
12 cumulative one. I mean, you can -- you can
13 have -- I mean, they used to measure it for the
14 month.

15 **Q Uh-huh.**

16 A And then you would have a cumulative,
17 you know, from the initial start date to date. So
18 you could have one for a month that would show a
19 1.0, you know, where you had a great month where
20 everybody performed exactly what was budgeted for
21 concrete, for steel, for rebar, for, you know, the
22 different crafts. But I never saw that.

23 **Q Okay.**

24 A I mean, every single month, every
25 single craft or work function was over its budget.

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1 And concrete was a great example because you had
2 so much concrete placement for a nuclear project
3 and the -- the P.F. factor for concrete was
4 significantly out of whack with the budget.

5 **Q All right. Thank you.**

6 MR. BALSER: Is that 30?

7 THE DEPONENT: Yes, sir.

8 (Exhibit number 30
9 marked for identification.)

10 By MR. HALTIWANGER:

11 **Q And just I want to give you an**
12 **opportunity to -- to scan that over. And just let**
13 **me know when you have so I can begin asking**
14 **questions.**

15 A Okay.

16 **Q All right. Can you tell us what exhibit**
17 **30 is?**

18 A Exhibit is just a write up of some of
19 the more significant irregularities in the
20 P.F. factors that Ken had in noticed when he was
21 reviewing the P.F. report from C.B.N.I.

22 **Q And when was this e-mail sent?**

23 A October the 10th of 2013.

24 **Q And if I could draw your attention to**
25 **the last paragraph on that page, the -- the second**

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1 to last sentence says that if performance continues
2 at the current I.T.D. rate, the direct craft labor
3 portion of the target price will be roughly 28.6
4 percent over the budget. If performance continues
5 at the year to date rate, the direct craft labor
6 portion of the target price will be 70 percent over
7 budget. Do you see that?

8 A Uh-huh. Yeah.

9 Q I -- under the E.P.C. contract, who is
10 responsible for direct -- for the payment of direct
11 craft labor? Was that a fixed price or was that a
12 cost-plus situation?

13 A No, that's cost-plus.

14 Q So if the price was not fixed, that
15 means an increase of the kind talking -- discussed
16 by Mr. Browne, that would be ultimately borne by the
17 rate payers?

18 A That's correct.

19 Q And do you know why he would have
20 included both the inception to date rate and the
21 year to date rate? Or what -- what is -- what do
22 those two separate numbers tell you as somebody
23 looking at the -- the P.F. factor?

24 A I -- I mean, he's -- I don't know why
25 he would do the year to date because that's really

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1 not a -- a depiction of anything. The inception
2 date is the one that you really would work off of.
3 I mean, year to date is just simply, you know,
4 this year's performance. That's not necessarily
5 an indication of what it's going to be at the
6 inception or at the end of the project.

7 **Q Okay. What is -- I --**

8 A Unless something specific happened in
9 2013 that would drive their P.F.'s to be more
10 extreme than in the prior years.

11 **Q Uh-huh. Okay. And this -- this type of**
12 **information, I -- would -- would it in some form or**
13 **another be passed on to SCANA management?**

14 A Oh, I was showing it every time I got
15 in front of Steve. I mean, we had quarterly
16 meetings with Steve Byrne. And Lonnie Carter came
17 to them most of the time. Michael Crosby would
18 come from Santee Cooper. But Steve was always
19 there. Kevin used to come to them before he
20 became C.E.O. And business finance team, which
21 was myself and Skip, we presented the business
22 finance challenges. These were not meetings to do
23 updates. These meetings were to bring the issues
24 and problems at the site to Kevin and Steve so
25 that they would be informed. And we brought the

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1 P.F. factor every single meeting. It was in the
2 slide deck that we presented to them.

3 And that was what you were supposed to
4 bring so that when they met with the executives,
5 if there was something that they could do to help,
6 you know, bring awareness or to make change in the
7 project that needed to be addressed, that's what
8 the form was supposed to be for, so they would
9 know of the issues.

10 **Q Okay. So there's no doubt in your mind**
11 **that senior management would have been well aware of**
12 **the issues with the P.F. factor?**

13 A Absolutely. I mean, it was -- we
14 witnessed the reading of Steve's testimony where
15 he acknowledges the P.F. factor is going to be a
16 huge challenge as it was estimated in that budget
17 amount.

18 MR. HALTIWANGER: Okay. Can I get you
19 to mark that?

20 (Exhibit number 31
21 marked for identification.)

22 By MR. HALTIWANGER:

23 **Q And Ms. Walker, I'm not going to ask you**
24 **about every single line on this.**

25 A That's good, because I don't know what

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1 this is, exactly.

2 **Q** Well, that's what I was going to ask
3 you. You had earlier testified about building
4 models.

5 A Yes.

6 **Q** Or calculating costs. And I was -- this
7 was one spreadsheet we came across that looked like
8 it was some sort of spreadsheet model --

9 A Yeah.

10 **Q** -- for -- for something. And I was
11 going to ask you --

12 A Uh-huh.

13 **Q** -- if you happened to know what -- what
14 this -- what this model was -- was built for.

15 A It looks like they are trying to build
16 to see which -- which cost is -- what the cost
17 differential is if you use a P.F. factor of 1.15
18 versus the actual P.F.

19 **Q** And I --

20 A And then they are --

21 **Q** Go ahead.

22 A And then they are looking at a delay
23 cost, 73,500.

24 **Q** Well, let me ask you, is -- is this one
25 of the models that -- that was used or -- or does

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1 **this appear to be similar to the models that were**
2 **used during the fixed price contract negotiations?**

3 A No, this is a new model.

4 **Q Okay.**

5 A This is something that was prepared in
6 January of 2016, potential target cost remaining
7 as of February 2016, man-hours, current labor cost
8 unless otherwise noted. Yeah, they are -- they
9 are doing this based on WEC paying Fluor-Daniel.
10 And they are definitely doing the difference
11 between the 1.15 P.F. and the actual P.F. They've
12 got the per diem and everything in here. And the
13 markups between WEC and Fluor and the markup for
14 field non-manual P.P.E., target expenses.

15 **Q Well, having looked at the document,**
16 **what -- and based on your experience on the project,**
17 **what -- what purpose would this model serve? Or**
18 **what -- or what would it be useful for on the**
19 **project?**

20 A They found out about some kind of
21 change in the project. Something happened with
22 the containment vessel. The containment vessel
23 delay impacts got changed. They've got a -- a
24 delay impact of 73,500,000. And now it's going to
25 change -- and the design finalization is going to

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1 cost them another 30 million and that's going to
2 cause G.N.A. to go up. So they -- they are going
3 to have a change order for another 108 mil--- 108
4 million dollars in 2007 dollars.

5 **Q Okay. I tell you what, I'll let you --**

6 A And they are trying to compare it back
7 to if it was in a target price, what would target
8 price have run up, I think. And they are saying
9 C.B.N.I. projected increase above change order 16
10 cost would have been two point -- almost three
11 billion. I don't -- I don't know.

12 **Q Okay. Well, then --**

13 A It's pretty squirrrly.

14 **Q All right. Well, I'm now going to --**
15 **you testified Bill Timmerman wa--- originally is the**
16 **person who brought you to the nuclear project?**

17 A Yeah.

18 **Q And do you recall when he retired?**

19 A 2009 -- I think it was in
20 two-thousand--- it was either in 2010 or 2011.

21 **Q Okay. After he stepped down as C.E.O.,**
22 **how often would you see him or communicate with him?**

23 A I saw him one time after he retired.

24 **Q And -- and where was that?**

25 A He came out to the project to -- to be

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1 on site when they delivered or set the bottom
2 bowl, I think.

3 Q Other than that, did you have any
4 interaction with him?

5 A No.

6 Q I've read where he was getting paid I
7 believe approximately 1.8 million dollars to be a --
8 to consult with the nuclear projects after he
9 retired.

10 A Uh-huh.

11 Q Are you aware of any work that he
12 performed on the project after stepping down as
13 C.E.O.?

14 A No.

15 MR. HALTIWANGER: Okay. All right. I'm
16 going to pass to Jim and let him ask some questions.

17 E X A M I N A T I O N

18 By MR. COX:

19 Q How are you doing, Ms. Walker?

20 A Good. How about you?

21 Q I'm doing all right. Thank you. We met
22 just before your deposition began. My name is Jim
23 Cox. I represent the O.R.S. --

24 A Okay.

25 Q -- in several different proceedings.

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1 One is the consolidated Public Service Commission
2 proceedings involving SCE&G's request to recover
3 from the rate payers the -- the capital cost on the
4 project. I also represent the O.R.S. in the state
5 court action filed by the customers against SCE&G
6 and SCANA.

7 (Off-the-record discussion.)

8 By MR. COX:

9 Q Ms. Walker, the O.R.S. was not present
10 at your first deposition. Just to give you some
11 history, that's not because the O.R.S. was not
12 interested in your testimony. At the time of your
13 first deposition, the P.S.C. had not yet authorized
14 depositions to occur in the Public Service
15 Commission dockets. That occurred after your first
16 deposition. So your first deposition was only
17 noticed in that state court class action filed by
18 the customers and the O.R.S. was not a party in that
19 litigation at that time. Since the time of your
20 first deposition, the O.R.S. has intervened in the
21 state court action and become a party. And as well,
22 the P.S.C. has authorized depositions in the
23 abandonment dockets. And so this deposition is
24 occurring in both of those proceedings. And I'm
25 not -- I'm going to not cover ground -- or try not

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1 to cover ground that the other attorneys have ably
2 covered already.

3 A Okay.

4 Q But there are a few questions I have.
5 Some of them relate to evidentiary issues.
6 It's this legal process where we have you look at a
7 document and identify it. So -- so a number of my
8 questions will relate to that and I might have you
9 explain briefly about some different documents.

10 A Okay.

11 Q The first document that I wanted to show
12 you is a document that the O.R.S. received in
13 response to a subpoena, a document subpoena that we
14 sent to your attorney. We sent a document subpoena
15 to your attorney requesting production of what you
16 called in the first deposition as the Jimmy file.
17 And we received documents from your attorney and I
18 would like to have you take a look at the documents
19 that we received.

20 MR. HALTIWANGER: What number is this?

21 COURT REPORTER: 32.

22 MR. HALTIWANGER: 32.

23 (Exhibit number 32
24 marked for identification.)

25 By MR. COX:

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1 Q So Ms. Walker, you've been handed a set
2 of documents labeled exhibit 32. And a few of them
3 are on ledger paper.

4 A Uh-huh.

5 Q Some of the pages are on standard letter
6 sized paper. I would like for you to review this
7 exhibit 32, and if you could, verify whether the
8 documents in this exhibit are the documents that you
9 referred to as the Jimmy file from your first
10 deposition.

11 A Yeah. Yeah. That's what it is.

12 Q Okay. And these documents, this Jimmy
13 file, these are the documents that you provided to
14 Mr. Addison prior to the March 2015 commission
15 filing. Is that correct?

16 A Yes.

17 Q Okay. I would like to go through this
18 briefly page by page. And if you --

19 A Can't do that.

20 Q Okay. Why is that?

21 A Because this is -- brings back too
22 much emotion.

23 Q Okay. And can you --

24 A If you want to go -- if you want to go
25 through this, you can do Ken Browne working

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1 through this.

2 Q Okay. Is it -- Ms. Walker, is it
3 correct to say that the SCE&G E.A.C. team had
4 calculated the E.A.C. cost to complete the project
5 at a higher P.F. factor than the Westinghouse factor
6 that had been provided to -- to SCE&G?

7 A That's correct.

8 Q And is it fair to say that you presented
9 that information to Mr. Addison?

10 A That's correct.

11 Q Ms. Walker, do you know if at any point
12 in time SCE&G had a plan to present a higher cost
13 number to the commission, higher than the number
14 that was presented in March 2015?

15 A No, I don't think they ever planned on
16 using the higher number.

17 Q So is it your understanding the company
18 had always planned to use the Westinghouse number?

19 A I don't know that they ever planned to
20 use a higher number. I just know that when we
21 calculated the number we had and Kevin had a lower
22 number, he chose the lower number.

23 Q Is it correct, Ms. Walker, that the
24 difference in E.P.C. cost between the Westinghouse
25 P.F. of 1.15 and the number that the E.A.C. team

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1 **used, the 1.55, that the difference in E.P.C. cost**
2 **was around 500 million dollars?**

3 A Yeah.

4 Q **During Mr. Browne's deposition, he**
5 **discussed some factors besides P.F. factor as to why**
6 **the E.A.C. team felt that the cost would be higher**
7 **than what Westinghouse was pro--- projecting. Do**
8 **you recall any other concerns that the E.A.C. team**
9 **had, the SCE&G E.A.C. team had about the**
10 **Westinghouse cost projections other than the**
11 **P.F. factor?**

12 A Yeah -- I don't remember any other
13 factors. I don't remember knowing the basis for
14 the WEC number because I never saw anything that
15 supported the WEC number. So I mean, I don't know
16 what was built into it. Ken may have seen some
17 detail, but I would not have seen.

18 Q **Would you defer to Ken Browne on the**
19 **details of the other concerns that the E.A.C. team**
20 **might have had with the Westinghouse projections**
21 **other than P.F. factor?**

22 A Yeah, because I'm -- I -- I'm not --
23 I'm not aware of what those factors are.

24 (Exhibit number 33
25 marked for identification.)

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1 By MR. COX:

2 Q Ms. Walker, you've been handed a
3 document labeled exhibit 33 to your deposition.
4 It's an e-mail from Sheri Wicker to you, copying
5 Kevin Kochems and Ken Browne, dated May 5th, 2015.
6 Did Sheri Wicker work in the SCE&G finance
7 department?

8 A She worked in the SCANA services under
9 me at the nuclear project.

10 Q Okay. And --

11 A She was one of the managers.

12 Q Okay. And the documents that she
13 forwarded to you, if you could -- they are attached
14 to this exhibit. Do you recall what these documents
15 are?

16 A These look like some of the -- like
17 references to some of the details behind that
18 budget, like questions that they might have had.

19 Q You're referring to the chart, the
20 E.A.C. review and validation?

21 A Yeah. This looks like questions that
22 they came up with on detail supporting that six
23 hundred and eight some odd million dollars because
24 they are asking about WEC backup for certain
25 amounts of money and they are pointing to the

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1 same -- Joe Ann Hyde was their financial lead
2 person.

3 **Q Do you recognize the name Joe Arostegui?**

4 A Yeah. I remember that name.

5 **Q Do you recall what role he filled?**

6 A I can't remember. Yeah, I think that
7 was the guy that did their budgeting at C.B.N.I.

8 **Q The second document attached to the**
9 **e-mail is entitled V.C. summer units two and three,**
10 **2014, E.A.C. analysis and discussion of cost**
11 **changes. Do you see that document?**

12 A Uh-huh.

13 **Q Was this the report that was prepared by**
14 **the SCE&G E.A.C. review team, to your knowledge?**

15 A This wasn't the final report, I don't
16 think, because it was a slide presentation.

17 **Q Was the slide presentation part of the**
18 **Jimmy file?**

19 A No, it was a separate -- no, the Jimmy
20 file was unique. This looks like it backs it up,
21 but they had a -- a nice, scripted PowerPoint
22 presentation, you know, that had just highlight
23 points on it. But this might have been their
24 detailed report that they gave the executives if
25 they wanted more detail.

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1 Q Ms. Walker, if you could look at the top
2 of page three of that attachment.

3 A Uh-huh.

4 Q It says, quote, in its E.A.C., the
5 consortium assumed that the project would reach a
6 goal P.F. of 1.15 within six months, period. This
7 does not appear to be achievable, period. End
8 quote. Was that the finding that was reached by the
9 SCE&G E.A.C. team?

10 A I think so, yeah. But obviously, we
11 didn't agree with -- that didn't agree with what
12 our executives believed.

13 Q But that was the conclusion that the
14 SCE&G E.A.C. team, that the company had formed,
15 reached, correct?

16 A Uh-huh.

17 COURT REPORTER: Is that a yes?

18 THE DEPONENT: I'm sorry, yes. And
19 there lies the biggest conflict that I've ever had
20 in my life.

21 By MR. COX:

22 Q Can you go ahead and explain that?

23 A Well, that's why I quit the company.
24 Because I couldn't deal with this conflict and
25 then the subsequent negotiation on that fixed

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1 price contract. This, I struggled reconciling
2 what happened here, and then on the heels of that,
3 when I watched what was negotiated on the fixed
4 price contract, I -- that was like the straw that
5 broke the camel's back. I just felt like I was
6 working with people that weren't ethical. And as
7 a C.P.A. and just as a person with integrity, I
8 just said that I can't work with people that I
9 don't feel like I can trust to do the right thing.

10 Q Before we look at exhibit 33, I would
11 like for you to turn to that big notebook in front
12 of you with the -- the hearing testimony. It's
13 exhibit 10.

14 A Okay.

15 Q If you could turn -- if you could turn
16 to page 275 of that transcript.

17 A Okay.

18 Q If you could look -- this is from
19 Mr. Byrne's testimony to the commission.

20 A Okay.

21 Q I'm going to read from line seven to ten
22 in his testimony and I would like for you to tell me
23 if you believe that his testimony is true. Quote,
24 for those reasons, I can affirm that these schedules
25 represent the best and most definitive forecast of

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1 the anticipated costs and construction schedule
2 required to complete this project that is available
3 as of the date of this filing of the testimony. End
4 quote. Do you believe that was a true statement?

5 A I don't -- I don't think so.

6 Q If you could turn to exhibit 33. That's
7 all I had on exhibit number 10, that notebook.

8 A Okay.

9 (Exhibit number 34
10 marked for identification.)

11 By MR. COX:

12 Q I'm sorry. It's exhibit 34.

13 A Oh.

14 Q So this is a five-page document or set
15 of documents labeled SCANA underscore RP0024742
16 through 24746. The first document seems to be an
17 e-mail between you and Mr. Addison. Can you -- let
18 me walk back and describe this. It looks like you
19 were telling Mr. Addison, feel free to call my cell
20 any time if I am out of my office. And Mr. Addison
21 says back to you, we'll call you later today.
22 Swamped prepping for board and earnings call. And
23 you respond, under--- understand; this is about your
24 earnings call. And then Mr. Addison says, we'll
25 definitely call. Just got a lot of folks waiting on

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1 **me to turn docs that have to go on board website**
2 **ASAP. Do you know what you were hoping to talk to**
3 **Mr. Addison about at this time?**

4 A I remember it was something pretty
5 important. Was this all together with these
6 notes?

7 Q **This -- these notes were not attached to**
8 **this e-mail.**

9 A Oh.

10 Q **So I'm not sure how the -- the notes**
11 **were placed with this e-mail. I -- the only thing**
12 **I'm certain of is that the notes were not**
13 **attached -- were not an attachment to the e-mail.**

14 A Oh, okay.

15 Q **The notes do refer to a similar time**
16 **period and I would like to ask you about the notes**
17 **in a minute. But at this point, I was just going to**
18 **reference the e-mail to see if you recalled anything**
19 **about what you wanted to -- to speak with**
20 **Mr. Addison about.**

21 A I remember it was really important
22 because I thought it would impact the earnings
23 call.

24 Q **So it had to do --**

25 A But I --

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1 **Q I'm sorry?**

2 A It had something to do with the
3 project, but I can't remember what it was.

4 **Q And Ms. Walker, this e-mail was only**
5 **five days after --**

6 A The hearing?

7 **Q -- the hearing. Right.**

8 A Okay. I know what it was, then. The
9 Thu--- the hearing ended on a Thursday. And I
10 went to work on Friday. And when I got in the
11 office on Friday, I found out that Jeff Archie,
12 who is the chief nuclear officer and a senior
13 executive, had been to the Tuesday monthly
14 meeting. And in that monthly meeting, the
15 C.B.N.I. execu--- C.B.N.I. general manager,
16 whatever is at the site person, announced that
17 there was going to be a delay in -- some big delay
18 on -- on some big component. I can't remember
19 what it was. It was -- it was a big delay and it
20 was going to impact the site. And Jeff Archie was
21 in there and he heard the news about the delay and
22 how long an impact it was going to have. It was
23 like a 10 or 12 month impact. And Tuesday
24 evening, he came to the night hearing and sat
25 there with Steve, didn't say anything.

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1 Then on Wednesday, the knucklehead
2 came to the hearing and sat beside Steve the whole
3 day while Steve finished his testimony. Steve was
4 on the stand on Tuesday afternoon, was there with
5 him, socializing with him, on Tuesday evening,
6 then came in in the morning and Jeff was talking
7 with Steve and Steve got back on the witness stand
8 and finished his testimony, didn't mention
9 anything about what he -- what Jeff heard about
10 and got off the witness stand. Nobody knew
11 anything about this delay but Jeff, who was at the
12 hearing.

13 And then I find out about it on Friday
14 and I can't find anybody at work because everybody
15 else took the day off because they had been at the
16 hearing all week. And so I just kept it to myself
17 until everybody came back to work Monday. And I
18 reached out to Jimmy to let him know about the
19 delay that I had just heard about, which was going
20 to have a huge financial impact to the project.
21 So I wanted him to know about it so he can decide
22 whether or not he needs to add some kind of, you
23 know -- you know, I don't know if he needs to make
24 a -- a statement about some kind of delay or if he
25 needs to modify what he's going to say, but that's

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1 what this was about.

2 And so I was very concerned about
3 Steve testifying, and Jeff being an officer of the
4 company, being right there at the hearing, sitting
5 there like a doofus head knowing that there was a
6 huge announcement yesterday at the meeting. And
7 matter of fact, Jeff got mad and told everybody in
8 the meeting that they are never to make an
9 announcement about a postponement or a delay in a
10 meeting setting like that again. So he knew that
11 was inappropriate. But yet, he still went to the
12 hearing with that information. And I thought that
13 that was stupid not to at least talk to Belton
14 Zeigler who normally runs our hearings.

15 **Q Did you feel that was material**
16 **information that needed to be disclosed to the**
17 **commission?**

18 MR. BALSER: Object to the form. Calls
19 for a legal conclusion.

20 By MR. COX:

21 **Q Did you -- did you hear the question?**

22 A I was concerned about it.

23 **Q Did you feel it was information that the**
24 **commission should know about?**

25 A I thought it was pertinent.

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1 Q Was it information that would affect the
2 cost of the project?

3 A Absolutely.

4 Q Was it information that would affect
5 the --

6 A Schedule?

7 Q -- schedule?

8 A Absolutely.

9 Q Do you know if Mr. Addison ever actually
10 called you after this e-mail?

11 A Yeah, he did call me, but I don't know
12 if he made any change. I shared the information
13 with him. He said thanks and I don't know what he
14 did with it. Just like everything else, it's like
15 I -- I did what I was supposed to do, and what
16 they did with it, I don't know.

17 Q And I would like to turn to the notes
18 that are behind this e-mail as part of this exhibit.
19 The first two pages are handwritten notes. It says
20 Carlette Walker's notes, timeline 2015. Are
21 these -- are these two pages notes that you took?

22 A Yeah. Yeah, that's in my handwriting.

23 Q Were these notes that you took at or
24 around the time of the events that you are
25 chronicling in this timeline?

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1 A Yeah.

2 Q Do you know if you wrote it day by day
3 or if you wrote it up at the end of the events at
4 one time?

5 A No, I think I wrote it up all at one
6 time. My handwriting would be more erratic if I
7 wrote it in different days.

8 Q And did you write it up within -- how
9 soon after the last entry on this timeline did you
10 write it up, if you can recall?

11 A Probably August 3rd.

12 Q 2015?

13 A Uh-huh.

14 Q Is that a yes?

15 A Yes. I'm sorry.

16 Q No, that's fine.

17 A Because what I was trying to do was
18 document who was where. And when I found out
19 about that delay and when the earnings release
20 was -- because again, that hearing, I was
21 uncomfortable -- I can't say that I knew for sure
22 that I was dealing with dirty players, but I just
23 was getting this really uneasy feeling in the
24 summer of 2015. And everything just kept not
25 feeling right with Kevin, definitely with Jimmy.

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1 I mean, I was getting reprimanded for everything
2 and anything. And I mean, I had been a star
3 player for 33 years, and now all of a sudden, it's
4 like everything I did just seemed to be not good
5 enough. You know, are you having trouble getting
6 to meetings on time? It's like what the heck.

7 I mean, you know, I was your go-to,
8 Kevin. For everything that bombed in this
9 company, you and Bill Timmerman sent me to fix it.
10 And I always did. And now all of a sudden, you
11 know, I'm at the -- the bottom end of everything.
12 And all I've done is done what you asked me to do.
13 And I can't figure out what you even want -- want
14 me to do now.

15 So I mean, I was just getting
16 bombarded with, you know, like negative everything
17 until I -- I mean, I -- literally, when I figured
18 out what Kevin had turned into, I mean, I really
19 think I had a nervous breakdown that night.

20 **Q And that was after he reported back to**
21 **you on the steps he had taken --**

22 A Yeah.

23 **Q -- regarding your --**

24 A Yeah, and he put me out on medical
25 leave.

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1 **Q You didn't want to go out on that leave?**

2 A No, I did.

3 **Q Okay.**

4 A I mean, I knew. It's like I -- I
5 wanted to resign. I -- I -- I -- once I figured
6 out who he was, it's like I don't want to be a
7 part of this organization. These -- I don't --
8 I'm not a thief and I don't lie. And that's what
9 Kevin ended up being and I didn't want to be a
10 part of it.

11 **Q Just turning back to this document**
12 **again, these evidentiary questions that I need to**
13 **ask, an exhibit thirty---**

14 MR. HALTIWANGER: Four.

15 By MR. COX:

16 **Q -- 34, these -- the second and third**
17 **pages of the document, the handwritten notes labeled**
18 **SCANA underscore RP0024743 and 24744 --**

19 A Now, where -- where are you finding
20 that?

21 MR. HALTIWANGER: It's at the very
22 bottom.

23 By MR. COX:

24 **Q It's at the very bottom right-hand**
25 **corner.**

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1 A Oh, oh, okay. Okay. Okay. Yeah.

2 Q **And I'm just referring to the Bates**
3 **numbers on the pages.**

4 A Oh, okay.

5 Q **This summary of events from this**
6 **timeframe, are these facts that you state, are these**
7 **accurate, to the best of your knowledge?**

8 A Oh, absolutely.

9 Q **The last two pages of the document,**
10 **24745 and 24746, can you explain what these**
11 **documents are?**

12 A The 45 is just a cover page to a
13 special topic that they had at the project review
14 meeting. And the special topic was module
15 fabrication status. And the handwritten notes
16 that look different from my handwriting, that is
17 Adam Hoey's notes. And that's -- we had talked
18 about that earlier. Adam was the first time that
19 we had somebody that could attend the monthly
20 project review meeting and actually try to take
21 SCE&G meeting minutes. And so that's him trying
22 to take down some notes as to what was talked
23 about during this module fabrication status
24 update.

25 Q **So were all -- on page 24745, the**

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1 **special topic module fabrication status, which of**
2 **those notes are written by you and which ones are**
3 **written --**

4 A The ones that --

5 **Q -- by Adam Hoey?**

6 A Okay. The ones at the very top in the
7 right-hand corner, that's my handwriting. And
8 then everything else that's handwritten on this
9 page is Adam's.

10 **Q And did you attend this meeting?**

11 A No, because that's when I was at the
12 hearing.

13 **Q And is this the meeting at which the**
14 **information that concerned you about the delay was**
15 **broadcast?**

16 A Right. And this is the -- this is the
17 module fabrication status. That's the subject of
18 the delay. See where it says Jeff, module issues?

19 **Q And did Adam Hoey report back to you**
20 **about what was rep--- what was reported at that**
21 **meeting about the delay?**

22 A No, I actually -- the first person I
23 saw on Monday -- or Friday when I came back into
24 the office, I ran into Ken. And Ken told me about
25 it. So then I went over to Adam and I got a copy

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1 of his notes. And then we all talked as a group.
2 And that's when I started becoming concerned about
3 when Jeff was at the hearing and what he knew at
4 the hearing and what impact that would have -- or
5 would have had and should have had and why didn't
6 we discuss it, you know, after the evening session
7 when the customers were able to ask questions or
8 make comments? Why didn't we discuss it after
9 that was finished instead of Jeff just simply
10 having it in -- you know, in his head and not
11 talking to somebody?

12 Now, don't -- and I -- and maybe I
13 jumped to the conclusion that they -- they may
14 have talked about it. I didn't hear anybody talk
15 about it. When the thing was adjourned, everybody
16 dispersed and got in their cars. So I never saw
17 him talk about it.

18 **Q Did anyone ever give you a reason why**
19 **the information about the delay was not disclosed at**
20 **the commission hearing?**

21 A It was never discussed. I mean, the
22 first time I heard about it was when I left -- the
23 hearing was finished and I went to the office on
24 Friday. That's when I learned about it. So I
25 didn't even know to ask or to bring it up until I

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1 got back.

2 **Q And no one ever gave you a reason why?**

3 A I mean, I wasn't going to -- I would
4 have had to confront Jeff, and I had already been
5 reprimanded by him three times.

6 **Q So you're not talk---**

7 A And I'm not -- you know, all I need to
8 do is give him a gun with a bullet in there so he
9 could shoot me. I figured that was the next step.

10 **Q So you never spoke with Jeff Archie**
11 **about why he didn't speak up at the --**

12 A Don't -- no. Didn't need to do that.

13 **Q So the last page of this document, Bates**
14 **numbered 24746, it's called Monthly Project Status**
15 **Review Meeting Agenda.**

16 A Yeah.

17 **Q July 16, 2015. And there's some notes**
18 **to the right-hand side --**

19 A Now, that's my -- that's my note.

20 **Q And you're reporting that this is the**
21 **session of the meeting at which the information was**
22 **disclosed about the delay?**

23 A Right. That's the shield building
24 panel fab delay that could not be mitigated for
25 unit two.

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1 Q So is it correct to say that the meeting
2 where that information was disclosed, the monthly
3 project status review meeting occurred on July 16,
4 2015 and you didn't learn about it until July 23rd
5 when you talked to Ken Browne? Correct?

6 A Right.

7 Q Do you know if anyone else in the
8 company, SCE&G or SCANA, knew about the information
9 about that delay aside from Jeff Archie prior to the
10 commission hearing?

11 A No, I don't think anybody knew about
12 it. Well, within Westinghouse, they probably knew
13 about it.

14 Q And -- and I don't -- I'm just asking
15 about SCE&G and SCANA. Do you know if --

16 A I don't know of anybody.

17 Q Do you know if anyone besides Jeff
18 Archie was at this meeting, this monthly project
19 status review meeting on July 16th?

20 A They -- no other -- nobody else would
21 have been because everybody was at the hearing,
22 all of the officers, because it was Steve, Kevin.
23 Marty Phalen never went to the nuclear plant.
24 Jimmy I think was at the hearing.

25 Q When -- this monthly project status

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1 **review meeting occurred five or six days before**
2 **the --**

3 A Every --

4 **Q -- commission hearing. Correct?**

5 A No, it happened during the -- during
6 the hearing on Tuesday.

7 **Q If you could turn to your timeline,**
8 **second page of this exhibit, the first entry on the**
9 **timeline says July six--- July 16, 2015,**
10 **P.R.M. attendees. Are you listing there the**
11 **individuals that were at the -- the meeting where**
12 **the -- the module delay issue was disclosed?**

13 A I -- I've got to have that date wrong
14 because the hearing was on the 21st. No, wait a
15 minute. Oh, we were in witness prep. I'm sorry.
16 We were in wit--- witness prep on the 16th and
17 they -- the -- the agenda for the project review
18 meeting was on the 16th. That's what it is. So
19 the attendees and witness prep were Steve Byrne,
20 Kevin Marsh, Skip, Ron Jones, Kevin Kochems, Chad,
21 Byron, Kenny and myself. And the attendees at the
22 project review meeting were Shirley, Ken, Maryann
23 Cherry, Adam, Jeff Archie, Allen Torres, Mark
24 Cannon. Then on the 21st is the hearing.

25 So Jeff learned of it at the hear---

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1 at the -- on the 16th. Then he came to the
2 hearing on the 22nd, the second day, because I
3 know it was the second day of the hearing -- or
4 the night of the first -- I don't remember which
5 one. Yeah, okay, it's the -- the 21st, the
6 evening at 6:00 p.m. was an evening public
7 hearing. That night, Jeff came and he knew of
8 the -- the delay.

9 **Q And is it your testimony that some of**
10 **the people who were at the witness prep on the 16th**
11 **would have normally been at the progress review**
12 **meeting, but weren't able to attend that one because**
13 **of the witness prep session?**

14 A Exactly.

15 **Q Would Mr. Byrne have been someone who**
16 **would --**

17 A No.

18 **Q He wouldn't have gone to the**
19 **P.R.M. meeting normally?**

20 A He rarely -- I mean, every once in
21 awhile, like maybe once or twice a year, he would
22 go to the project review meeting. I mean, that
23 was not well attended by our executives. Jeff,
24 who is the chief nuclear officer, had an office in
25 nuclear and he would rarely come out there. He

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1 would rarely come to a monthly project review
2 meeting.

3 **Q Did you feel that Mr. Archie and**
4 **Mr. Byrne should have gone to more of those**
5 **meetings?**

6 A Yeah. I mean, I can't understand why
7 Kevin Marsh never came to anything. I mean, he's
8 the one that told me, he was like this -- we're
9 betting our entire company on this project. It's
10 doubling our balance sheet. I would have thought
11 he would have maybe come to a meeting or two over
12 it. Once he got C.E.O., he never came to
13 anything. I'm the one that had to push for the
14 C.F.O. to create quarterly meetings with him and
15 the C.E.O. so that I could meet with them so I
16 could tell him of issues that I saw because that's
17 what Bill Timmerman would have me do.

18 And I mean, I had to push to have that
19 meeting. And it's like, well, wouldn't you --
20 don't you want to know what's happening at your
21 project? I mean, this is the thing that could
22 sink your company. And it is. And his -- he
23 didn't seem to care. Well, he did care. I mean,
24 the cou--- the first couple of times, he was like,
25 well, I -- why haven't I heard about these change

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1 orders? And it's like, well, I don't know; that's
2 why I'm here to tell you. And then there came a
3 day where those -- a day that Jimmy couldn't be
4 there and I went to the meeting and I found out
5 that Jimmy wasn't going to be there and the tide
6 had already changed. And so I told him, I said,
7 well, just -- we'll just skip the meeting.
8 Because I knew that Jimmy didn't want me to be
9 around Kevin without him there to monitor what I
10 said.

11 And I tried with everything I had to
12 get out of that meeting. And Kevin insisted that
13 we meet. And I could tell it was weird. And
14 Kevin was in on the ploy to -- to beat me up to
15 get me to leave the company because he knew I
16 wasn't going to play their game. I wasn't going
17 to lie with them. And so he -- we had the
18 meeting. And Mark Cannon, for whatever reason,
19 wasn't able to join us. And I shared the
20 information and I got out of there as fast as I
21 could. But there was little to no reaction. And
22 with the information I was sharing with him, I
23 mean, it should have -- he should have been
24 roaring because the P.F. factors were awful.

25 **Q Ms. Walker, one thing that we have heard**

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1 is that there was a 78 million dollar piece of
2 equipment made in California and shipped around
3 South America to Charleston. I-26 was closed to
4 guard the equipment to -- to get it to the Fairfield
5 site only to discover it was incompatible and still
6 sits up there in a field. Do you know anything
7 about this?

8 A No, I don't know anything about that.

9 Q I'm almost done, Ms. Walker.

10 A Okay.

11 MR. BALSER: Good question.

12 THE DEPONENT: I hope that's not true.

13 MR. BALSER: What number is this?

14 Thirty-five?

15 (Exhibit number 35
16 marked for identification.)

17 By MR. COX:

18 Q This is exhibit 35, Ms. Walker. It's an
19 e-mail, one-page e-mail on Bates number SCANA
20 underscore RP0850425. The e-mail exchange is going
21 to begin at the bottom on these types of --

22 A Oh, okay.

23 Q -- e-mail exchanges to -- to see it from
24 the beginning. It's an e-mail from November 9,
25 2014, from you to Jimmy Addison. Mr. Addison

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1 **responds and copies Mr. Marsh and then Mr. Marsh**
2 **responds as well. Can you take a moment to read**
3 **this? And then I just have a couple of questions**
4 **for you about it. Did you get a chance to review**
5 **that document, Ms. Walker?**

6 A I did.

7 Q **In your initial e-mail, you say Ron**
8 **Allen and I are scheduled for the first quarterly**
9 **meeting with Dukes Scott this Thursday. Dukes Scott**
10 **was the director of the O.R.S.; is that right?**

11 A That's right.

12 Q **What type of meeting are you talking**
13 **about here?**

14 A Just a briefing where we just go over
15 and give him a briefing on the project.

16 Q **Did you frequently attend those**
17 **meetings?**

18 A We didn't really have briefings where
19 it was just Dukes and the three of us. It tended
20 to be more of a -- a quarterly briefing with like
21 most of his staff and -- the legal staff. And
22 then it would be like Skip, myself, the guy over
23 construction, which would be Allen Torres, and
24 then William Hudson from corporate planning would
25 go. Kenny Jackson over regulatory and then Byron

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1 Hinson that ended up being over regulatory went.
2 And Al Bynum sometimes would go. And then the
3 person doing the licensing would give updates.
4 That was April Rice. April Rice. And sometimes
5 we would have Brad Stokes go to talk about the
6 engineering and design. So it would be a
7 different -- a variety of different people from
8 the project that would go up there and talk to the
9 leadership team of the O.R.S.

10 **Q Do you have any recollection of this**
11 **meeting that you're referring to in this e-mail?**

12 A Not specifically. I mean, I remember
13 meeting maybe twice with Dukes separate from his
14 team, but I mean, it wasn't anything significant
15 about it. It was just a matter of he wanted to
16 get an update on that -- you know, where the
17 E.A.C. was headed and what the negotiations were
18 looking like whenever they were negotiating -- I
19 guess it was fixed price. But it couldn't be
20 because this was in '14.

21 **Q November of 2014.**

22 A So I don't know what this E.A.C. --

23 **Q Your e-mail says, Dukes has specifically**
24 **indicated that he wanted me to provide him with**
25 **updates on the E.A.C. and the delay -- delay**

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1 **negotiations. That was a -- that was a true**
2 **statement you made about what he had asked for from**
3 **you; is that right?**

4 A Yeah. So I don't know why we were --
5 I mean, that was in November of '14.

6 Q **Is this during the time that --**

7 A We did it in '15.

8 Q **I'm sorry. Go ahead.**

9 A And we did that -- that would have --
10 that might have been right at the beginning of it,
11 but I didn't think we started in -- at the end of
12 '14.

13 Q **Are you talking about the -- the**
14 **E.A.C. team?**

15 A Yeah. I don't think we started that
16 late or that far back.

17 Q **I know it's somewhat distressing to you,**
18 **but there's one document in the Jimmy file or what**
19 **we have labeled exhibit 32.**

20 A Uh-huh.

21 Q **It's the fourth page of that document.**

22 A Does it tell you what timeframe?

23 Q **It's a PowerPoint entitled E.A.C. Review**
24 **Team Preliminary Update Preparation for 10/13/14.**

25 A Okay. So we did start back that --

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1 that far back on it.

2 **Q** Okay. I wanted to ask you about
3 **Mr. Marsh's response about halfway down the e-mail.**
4 **Part of his response, he says to you, quote, we**
5 **should not get into the details of the discussions**
6 **today. End quote. Did you feel that Mr. Marsh was**
7 **limiting the information that you could provide the**
8 **O.R.S. about the SCE&G E.A.C. calculations?**

9 A Always.

10 **Q** **What made you feel that way?**

11 A Just that we should not get into the
12 details.

13 **Q** **Were there any other communication you**
14 **had like that from any of the senior executives?**

15 A Oh, always.

16 **Q** **Which -- which executives would tell you**
17 **that?**

18 A Jimmy. It was probably more from
19 Belton Zeigler and Mitch Willoughby, their outside
20 legal counsel that helped with all of the
21 regulatory stuff that would kind of coach you as
22 to what you were supposed to get into and not get
23 into.

24 **Q** **You mention at the top of this e-mail**
25 **that you had the benefit of talking with George**

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1 **Whenick. Do you know who George Whenick is?**

2 A George Whenick was their outside legal
3 counsel that they hired out of Atlanta, Georgia.
4 And he was the one that would orchestrate --

5 MR. BALSER: Before you -- before you
6 say anything else, he asked you if you knew who he
7 was. And that's really all you can say. You --
8 it's a -- George Whenick's a lawyer, provided legal
9 advice to SCANA. It's SCANA's privilege and SCANA's
10 not waiving that privilege and you can't waive it.
11 By MR. COX:

12 **Q How many times did you speak with George**
13 **Whenick?**

14 A I can't remember.

15 **Q Was it --**

16 A Not many.

17 **Q Okay. Was it more than once?**

18 A Probably.

19 **Q Do you know what caused you to talk to**
20 **George Whenick in this situation?**

21 A Not really.

22 (Exhibit number 36
23 marked for identification.)

24 By MR. COX:

25 **Q Ms. Walker, this is -- exhibit 36 to**

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1 your deposition is an e-mail between you and Evelyn
2 Varn, February 11, 2015. Bates numbered SCANA
3 underscore RP0019126. Ms. Varn says, just wanted to
4 say hello and hope things get better. I am worried
5 about you. It is not worth it. You need to be
6 happy again. Do you know why Ms. Varn was reaching
7 out to you at this time?

8 A Probably because of the obvious weight
9 loss. And everybody that saw me could tell that I
10 was stressed to the max.

11 Q And you -- you reference that, I will
12 say this project and my role is really stressing me
13 to the max. I don't want to go to prison over this
14 stupid job and I know I wouldn't get any backing if
15 it came down to someone making me one of the fall
16 guys. Can you explain what you meant there?

17 A Well, I mean, I laughingly told people
18 when I first was put in that position, people
19 would say congratulations, and I joked and I said,
20 well, it's really more of a sacrificial lamb. So
21 I would make the baa-haa noise because it's like,
22 well, when things go bad, you know I'll be the
23 sacrificial lamb, don't you?

24 And -- and then it was around this
25 timeframe in February of 2015 that things just

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1 didn't feel right and they continued to just feel
2 more and more uncomfortable as that E.A.C. work
3 continued all the way through until my husband got
4 sick. And then when they filed that testimony and
5 put the number that I had argued was too low --
6 and then from there, it just went downhill
7 throughout the balance of that year until I
8 finally saw the real Kevin at the end of the year.
9 And at that point, it was my 33 years that I had
10 put into the -- my career were shot.

11 **Q I would like to return to just one issue**
12 **that Mr. Haltiwanger had asked you about. And it**
13 **relates to the calculations that SCE&G was deciding**
14 **to use in deciding whether to enter into the 2015**
15 **E.P.C. amendment, including the fixed price option.**
16 **When SCE&G was deciding what the cost would likely**
17 **be if it didn't enter into the amendment and if it**
18 **just stayed with the current contract --**

19 A Uh-huh.

20 **Q -- did it use the -- the cost or**
21 **estimate as the cost the cost that Westinghouse had**
22 **provided to SCE&G and that was used in the 2015**
23 **P.S.C. filings or did it use a -- a higher number?**

24 A See, that, I can't remember. You
25 know, they did -- we did like tons of modeling.

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1 And I can't remember all of the scenarios that we
2 ran. So I mean, I -- we may have done the 680 or
3 whatever it was and the billion-two -- or we might
4 have picked something different. You know, at
5 that point, we might have updated based on the new
6 average P.F. factor. You know, I just don't
7 remember.

8 **Q Do you know who would know information**
9 **on that subject?**

10 A Kevin Kochems would probably be -- be
11 the best person to ask.

12 **Q And there were documents generated on**
13 **that issue regarding the models to you?**

14 A Yeah, all of those are -- should be
15 saved in the internal documents that they have at
16 the company. He's -- he's the one that's still
17 there at the company.

18 **Q And Ms. Walker, in your interactions**
19 **with the O.R.S. personnel that were overseeing the**
20 **project, what was your impression of the diligence**
21 **of those individuals?**

22 A I think that the O.R.S. staff were --
23 they tried. I was extremely disappointed in Dukes
24 Scott when he made the decision to not have Gary
25 Jones' testimony filed and he tore it up and had

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1 him stay in Chicago. To me, that's fraud. SCE&G
2 was required to pay for that consultant. And for
3 him to not have that consultant's testimony
4 entered in that case was inappropriate and he
5 should have been terminated. But yet, he was
6 allowed to retire. I think that there should be
7 something done about that. He shouldn't be
8 allowed to be able to just walk away and not have
9 his name tarnished, just like Kevin, Steve, Jimmy
10 and Jeff Archie and Marty Phalen. I think all of
11 those are really bad actors and they've hurt a lot
12 of people.

13 **Q** **Did you agree with Gary Jones regarding**
14 **the -- the testimony that Mr. Jones was going to**
15 **present?**

16 **A** I never -- I never saw it. So I -- I
17 don't know what his testimony was. I just know
18 that when my husband and I were flying home from
19 Chicago, I think it was about six -- well, it was
20 in like June of '16. We had gone up for a
21 wedding, and we were flying out of the O'Hare
22 airport and we happened to run into Gary Jones in
23 the security line. And of all the people to run
24 into in the O'Hare airport, I ran into Gary Jones
25 and Gary was kind of surprised to see me.

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1 And so we greeted each other and he
2 asked me where I had been. And I said, what do
3 you mean, where I've been? And I said, I -- I
4 resigned from the company. And he looked startled
5 and said, well, I didn't know that. And I said,
6 yeah, I resigned. And he said, well, I'll be sure
7 and tell Dukes that. And I said, well, you don't
8 think Dukes knows that I am no longer with the
9 company? I said I haven't been there since
10 January. And he said, I don't know; I'll have
11 to -- I'll -- I'll tell him that; I'm sure he will
12 want to know. And I said, well, you do that, but
13 take care of yourself.

14 And so I don't -- we parted and he
15 went and got on his plane, and ended up, he was on
16 the same plane we were flying to Columbia in. But
17 you know, he's a nice guy and I think he knew what
18 he was doing. And so I -- I mean, I'm super
19 disappointed. I mean, I don't know what Dukes got
20 out of it other than it was just -- you know,
21 SCE&G or SCANA executives just kissed his butt and
22 he was on an ego trip. Because he was an ego---
23 he's an egomaniac.

24 **Q Would you agree, Ms. Walker, that SCE&G**
25 **was limiting the information that could be presented**

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1 **to O.R.S. when you worked on the project?**

2 A I wouldn't say that. I mean, I think
3 they were pretty -- I think they were pretty open
4 with the information. I think that that project
5 was so huge and that staff was -- it wasn't
6 outfitted with the people it would take to be able
7 to -- to oversee a project of that magnitude.

8 Q **You mentioned -- or strike that. The --**
9 **the Westinghouse productivity factor of 1.15 that**
10 **was used in the calculations, did you ever receive**
11 **any information that gave you an impression as to**
12 **whether Westinghouse thought it could -- really,**
13 **truly thought it could achieve that number?**

14 A I never heard anything about a 1.15.
15 And -- and whether they could achieve that, I
16 mean, you could never convince me that they could
17 ever hope to get a 1.15 on that project.

18 Q **Ms. Walker, are you a stockholder in**
19 **SCANA?**

20 A No, I don't own any stock in SCANA. I
21 did, but as soon as I was no longer an insider, I
22 sold every -- I -- my financial planner asked me
23 if I wanted to keep just some as a memory. I said
24 I don't want to own one share of stock in that
25 company.

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1 Q Ms. Walker, there's a hearing starting
2 this Thursday before the commission. It relates to
3 several dockets, including a docket in which SCE&G
4 is requesting the right to recover through rates its
5 capital cost in connection with the project.
6 There's a number of witnesses who have been
7 identified to appear in the proceeding and there's a
8 number of witnesses who have had their deposition
9 taken, including yourself. It's not just you.
10 Mr. Marsh, Mr. Addison and Mr. Byrne have -- have
11 also had their deposition taken as well as many
12 other individuals. The -- there's some rules of
13 evidence about whether witnesses are available or
14 not to appear at the -- at the hearing. Are you
15 available to testi--- I know you would -- probably
16 wouldn't want to testify at the hearing, but are
17 you -- and I'm not sure if your -- your health would
18 permit it, but --

19 A I would rather not.

20 MR. MOORE: I believe that -- that this
21 is about as far as she can go.

22 MR. WALKER: Yeah.

23 MR. MOORE: And my belief is that
24 emotionally, she could not appear in a trial.

25 By MR. COX:

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1 Q And let me ask you this, Ms. Walker,
2 given what your attorney has stated there. If -- if
3 you were to testify at the hearing and asked whether
4 you would adopt your deposition testimony from your
5 first deposition and this deposition under oath at
6 the hearing, would you -- would you do that?

7 A I can do that. I just want you to
8 know, I mean, I had a heart attack in March
9 because of this shit.

10 MR. WALKER: Yeah, we ain't going to no
11 hearing. I can tell you that.

12 MR. COX: Okay.

13 MR. WALKER: That ain't happening.

14 By MR. COX:

15 Q And -- and I -- I would like permission
16 to talk with you and your attorney afterward
17 about -- about your availability to testify.
18 There's evidentiary questions related to health
19 about whether witnesses are available. I do have a
20 subpoena for your appearance at the hearing and I
21 would like to present that to you and your attorney
22 and we can discuss whether your health permits you
23 to be available to testify.

24 A I mean, I -- I would also want people
25 not to be in the room. I don't want to see Steve,

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1 Jeff, Jimmy, Kevin. I don't ever want to look at
2 those men.

3 MR. COX: I understand. Ms. Walker, I
4 appreciate your time today and it has been a long
5 day and I appreciate your time and your -- and your
6 testimony. Thank you.

7 THE DEPONENT: Thank you.

8 MR. BALSER: I have some very, very
9 brief follow up based on some of the questions that
10 Mr. Cox and Mr. Haltiwanger asked you, but I'll be
11 very brief.

12 FURTHER EXAMINATION.

13 By MR. BALSER:

14 Q I want -- if you could start with
15 exhibit 31, which Mr. Haltiwanger showed you. It's
16 this color chart.

17 A Okay.

18 Q This is the one that's -- appears to
19 have been created in 2016. I just want to make --
20 to clarify, you had no role in preparing exhibit 31.
21 Right?

22 A Huh-uh. Right.

23 Q And you don't know for what purpose it
24 was prepared?

25 A No idea.

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1 Q Okay. Let's look at exhibit number 33.
2 This is one of the ones that Mr. Cox showed you that
3 has -- there's an e-mail from Sheri Wicker to you.
4 And then there's some attachments.

5 A Okay.

6 Q So the first thing I want to ask you is
7 there's an attachment that's called -- I guess this
8 first spreadsheet, action items, template version.
9 Is that attachment something that you prepared?

10 A No.

11 Q And do you know who prepared it?

12 A No.

13 Q All right. Let's look at the second
14 attachment, which is the document that says
15 V.C. summary units, two and three.

16 A Uh-huh.

17 Q That's not a document that you prepared,
18 is it?

19 A No.

20 Q And do you know who prepared it?

21 A I don't.

22 Q All right. Let's look at exhibit 34,
23 which is the document that had your handwritten
24 notes attached to it.

25 A Okay.

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1 Q I want to start at the back of that. So
2 this -- we've got these two pages. I want to look
3 at the one that ends in Bates number 45 first.

4 A Okay.

5 Q This document, this -- this is one page
6 from a -- a meeting that you do not attend.
7 Correct?

8 A That's right.

9 Q And -- and you received this particular
10 document, that is, the one ending in 45 in exhibit
11 34 from Mr. Hoey?

12 A Hoey, yes.

13 Q Ho--- I'm sorry.

14 A Hoey.

15 Q Hoey. Okay. And the only handwritten
16 notes on here that are yours are at the very top and
17 the very bottom. Is that correct?

18 A That's correct.

19 Q All right. On the second -- on the last
20 page of exhibit 35, this is the month -- the monthly
21 project status review meeting agenda for July 16th,
22 2015.

23 A Uh-huh. That's right.

24 Q That is not a meeting agenda that was in
25 your possession. Correct? You got this from

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1 **somebody else?**

2 A That's correct.

3 MR. COX: You referred that -- to that
4 as exhibit 35?

5 MR. BALSER: I said 34.

6 MR. COX: Okay.

7 MR. BALSER: I hope I said 34. I meant
8 exhibit 34.

9 COURT REPORTER: Yeah.

10 MR. COX: You said -- okay. I just
11 wanted to be sure.

12 By MR. BALSER:

13 **Q Thirty-four. You were not present at**
14 **the monthly project status review meeting on July**
15 **16th, 2015.**

16 A Right.

17 **Q And the notation that you have in your**
18 **handwriting on the last page of exhibit 34 is**
19 **information that you learned from talking to Adam**
20 **Hoey?**

21 A Right.

22 **Q Okay. Let's look at your handwritten**
23 **notes that are the second and third pages of exhibit**
24 **34. And Mr. Cox asked you about the sequence of**
25 **events and I think you laid out the scenario in**

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1 **which Mr. Archie learned information in this July**
2 **16th meeting that you and the other senior staff**
3 **were not aware of because you were in witness prep**
4 **at the time. Right?**

5 A Right.

6 Q And then he asked you whether
7 **Mr. Addison ever followed up with you. And I want**
8 **to direct your attention to the note dated 8/3/2015**
9 **on Bates number ending 4744. Do you see that?**

10 A Uh-huh.

11 Q This says, Addison staff meeting,
12 **directly following Jimmy's staff meeting, I lingered**
13 **behind to ask Jimmy a follow up on if he was able to**
14 **identify different facts that supported him not**
15 **having to disclose a potential delay impact to unit**
16 **two --**

17 A C.O.D.

18 Q C.O.D., what is that? What does
19 **C.O.D. stand for?**

20 A Completion date.

21 Q Completion date because of shield
22 **building --**

23 A Building panel --

24 Q Panel --

25 A -- fab.

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1 Q Panel fab. Jimmy said he called Steve
2 after he and I had talked on the 27th and Steve
3 called Karl Churchman, the consortium director --

4 A Uh-huh.

5 Q -- and directly asked about the claim
6 that there was no opportunity to -- to mitigate the
7 schedule impact to unit two's --

8 A This late in the fabrication --

9 Q This late in the fabrication schedule?

10 A Schedule. Yeah.

11 Q Karl supposedly told Steve there were
12 still opportunities to mitigate the fabrication of
13 the panels for our shield building panels. Do you
14 see that?

15 A Yeah. There you go. See? You can
16 always mitigate.

17 Q Does that accurately reflect what
18 Mr. Addison told you?

19 A That's what Mr. Addison told me. And
20 so you've got to believe it.

21 Q So --

22 A Because he doesn't lie.

23 Q You mentioned that Dukes Scott tore up
24 Gary Jones' testimony. And I -- I wanted to follow
25 up with you on that. What -- what is it -- and what

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1 is it that Mr. Scott did specifically that you --
2 and -- and don't limit it if -- if -- if it's -- not
3 essentially necessarily trying to limit it to just
4 whatever he did with -- with Gary Jones, but what --
5 what do you think Mr. Scott failed to do in his role
6 or did that you think is inappropriate?

7 A He didn't file Gary Jones' testimony,
8 pre-filed testimony.

9 Q And do you have any re--- do you have
10 any understanding as to why Mr. Scott elected not to
11 do that?

12 A No.

13 Q And what do you -- why do you think it
14 was wrong of Mr. Scott to not file Mr. Jones'
15 pre-file testimony?

16 A Because he's a paid consultant. And I
17 don't think that it should be Mr. Scott's
18 responsibility or judgment to decide whether or
19 not that -- that his testimony is correct or
20 incorrect. I think that the P.S.C. themselves
21 should be able to decide whether or not to take
22 his judgment.

23 Q The only other question I have for you,
24 Ms. Walker, relates -- it's very technical, but
25 relates to some questions Mr. Haltiwanger was -- was

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1 **asking you about the hun--- back to the hundred**
2 **million dollar payments in CWIP. Okay?**

3 A Okay.

4 Q **Are you aware that the CWIP number filed**
5 **with the Public Service Commission in 2016 does not**
6 **include the one hundred million dollar payments?**

7 A I told you I did not know.

8 Q **Okay. Did you know that the CWIP number**
9 **included invoices -- the figures from invoices that**
10 **were actually submitted by Westinghouse for that**
11 **time period?**

12 A No, I wouldn't know that.

13 MR. BALSER: Okay. Those are all of the
14 questions I have. Thank you very much.

15 MR. COX: I just have one question,
16 Ms. Walker.

17 F U R T H E R E X A M I N A T I O N.

18 By MR. COX:

19 Q **You had said something about Mr. Addison**
20 **doesn't lie. It sounded like you were being**
21 **sarcastic when you said that. Was that a sarcastic**
22 **statement that you made?**

23 A That's -- no, it wasn't sarcastic.

24 Q **Okay.**

25 A I fully expected for them to come back

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1 and say something like that because that's exactly
2 how they operate. Karl Churchman is the consor---
3 was a consortium director. Somebody from
4 C.B.N.I. reported the delay, called Churchman,
5 cleaned up what C.B.N.I. reported. And so it was
6 said, oh, we can mitigate that because that's what
7 SCE&G wanted to hear.

8 **Q So you meant that SCE&G got the**
9 **information it needed to justify --**

10 A Exactly.

11 **Q -- what it was doing?**

12 A So that it didn't have to report a
13 delay.

14 **Q No further --**

15 A That cleaned that up.

16 MR. COX: No further questions.

17 F U R T H E R E X A M I N A T I O N.

18 By MR. BALSER:

19 **Q You weren't a party to the conversation**
20 **between Mr. Byrne and Mr. Churchman, were you?**

21 A No, I was not.

22 MR. BALSER: That's all I have.

23 MR. HALTIWANGER: I just got one more.

24 F U R T H E R E X A M I N A T I O N.

25 By MR. HALTIWANGER:

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1 Q In exhibit 32, which was the Jimmy file,
2 as we've been calling it, you had a page on there on
3 the shield building subcontract analysis.

4 A Uh-huh.

5 Q And the figure at the bottom under
6 the -- under the calculations is 58,477,287 dollars.
7 What does that figure represent?

8 A Probably the cost of the shield
9 building.

10 Q And -- but how did that cost come about?
11 What was -- what was the imp--- you know, why were
12 you focused on that in -- in the file here? And
13 while you're thinking about it, did this issue come
14 up because the shield building wasn't designed as
15 airplane proof?

16 A I was going to say, I think it had
17 something to do with the airplane -- I'm trying to
18 remember. See, I don't remember the contract
19 terms. And I can't remember if the shield
20 building was a fixed price or if it was -- I can't
21 remember why the shield building is held out
22 separately. But there was something -- there was
23 a reason why the shield building is accounted for
24 separately like that, but I can't remember what --
25 what the detail was.

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1 **Q And when you say accounted for**
2 **separately, what do you mean by that?**

3 A Why we're measuring it separately like
4 that.

5 **Q Okay.**

6 A I know the shield building had to be
7 modified to be able to withstand the impact of an
8 aircraft. And there was a question about when
9 that was adopted, was it pre the signatures on the
10 contract or post the signatures of the contract?
11 And I think that they kind of got that cleared up
12 and I think that it was pre the signatures on the
13 contract.

14 MR. HALTIWANGER: Okay. That's all I
15 have.

16 MR. RICHARDSON: Just to clarify, you
17 know we've got the privilege log of the Carlette
18 Walker documents that have not finished review. And
19 three of our exhibits today have redacted
20 information. And so we're not terminating, we're
21 adjourning the deposition pending further review
22 based on that privilege log in-camera review of the
23 Carlette Walker documents.

24 MR. MOORE: Anybody else?

25 VIDEO TECHNICIAN: This concludes

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1 today's deposition of Carlette Walker. We're off
2 the record at 5:30 p.m.

3 (Deponent excused.)

4 (Whereupon, at 5:30 p.m.,
5 the taking of the foregoing
6 deposition was adjourned.)

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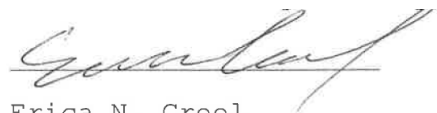
CERTIFICATE OF REPORTER

State of South Carolina
County of Florence

I, Erica Creel, Court Reporter and Notary Public for the State of South Carolina, do hereby certify that the deponent in the foregoing deposition was, by me, first duly sworn to testify to the truth, the whole truth and nothing but the truth; that said deposition transcript contains a true record of the deposition of said deponent.

I further certify that I am neither attorney nor Counsel for, nor related to or employed by any of the parties connected to the action, nor am I financially interested in the action.

Witness my hand at Florence, South Carolina, this the 31st day of October, 2018.



Erica N. Creel
Notary Public for South Carolina
My Commission Expires: March 2, 2022

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