

SDS Claim

Their Claim	Counter Claim
<ul style="list-style-type: none"> • Quantum <ul style="list-style-type: none"> ○ Duplication with amounts in charges (paid) and (claimed) ○ Their own causes for delay • Delays caused by SDS <ul style="list-style-type: none"> ○ Summary of each <ul style="list-style-type: none"> ▪ Delay cause and duration ○ e.g: <ul style="list-style-type: none"> ▪ Extent of PD not submitted on time ▪ Resubmission of PD not correct ▪ When were we notified on each critical issue • Extent to which critical issues really held up design. What do their programme and applications show? • Legal entitlement (See LMcC Email) • What were the things we did that were really SDS obligations? 	<ul style="list-style-type: none"> • Delay to commencement of RDP - 1 month (20 days) delay initially due to PCG not being available in time to sign the contract plus 2 months further delay whilst RDP was resubmitted. Timesheets show that SDS did not mobilise as planned. <ul style="list-style-type: none"> ○ To what extent was this due to tie? What is documented? ○ What commitments did SDS make to mobilisation? ○ What were the approval increments? <ul style="list-style-type: none"> ▪ Proportion approved and when. When was last RDP submission made? And what was it? (Trackform?) ▪ Reasons for SDS failure to commence to extent known • Delay to commencement/completion of PD – 4 months <ul style="list-style-type: none"> ○ To what extent is this due to tie? ○ What is documented? ○ SDS (Mike Jenkins) commitments to tie in March 06. ○ SDS commitments to Willie Gallagher and Andie Harper in autumn • Utilities delays <ul style="list-style-type: none"> ○ What's the cause of the delays to utilities designs?

Programme	Applications
1) For each critical issue <ul style="list-style-type: none"> • What did their programme show as successor tasks? • In subsequent programmes what did they show for progress in the critical issue and successor items? • What was the forecast duration to go on each successive programme – was it the same, reduced or extended? 2) What was the general level of progress shown in each successive programme from August 06 for each design section? 3) For critical issues what are the programme dependencies for the issues they responsible for (red items in spider diagram) 4) What do successive programmes show for reasons for delay for utilities commencement?	1) For each application from outset what were the percentage of total claimed for: <ul style="list-style-type: none"> • RDP • PD • DD
	<p style="text-align: center;">Manpower Submissions</p> 1) What does this show – month by month for contract <ul style="list-style-type: none"> • For management and supervision • For design personnel

Our Issues

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| <ul style="list-style-type: none">• The things obligated to do but did not or did not do effectively<ul style="list-style-type: none">○ VE○ Surveys (not done at PD stage)○ Risk Management for project• Schedule impact not advised with changes | <ul style="list-style-type: none">• Impact of SDS delays on critical issues items progress• Up to October changes on charettes etc. SDS confirmed our management claim• When did track alignment get resolved – this would have triggered utilities commencement |
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