



August 6, 2018

**DELIVERY VIA ELECTRONIC FILING**

David E. Capka, P.E.  
Director, Division of Dam Safety and Inspections  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**RE: Substitution for Independent Board of Consultants ("BOC"); FERC Nos. P-2082, P-14803, NATDAM-OR00559, CA00323, CA00234, CA00325**

Dear Director Capka:

On May 22, 2018, the Commission approved the above-referenced BOC to review and assess various matters in connection with the Lower Klamath Project. The approved BOC included Mr. Robert Muncil, a licensed insurance broker and risk management expert. Mr. Muncil recently informed KRRC that, due to changed circumstances, he is no longer able to serve on the BOC.

To maintain the desired level of expertise with respect to insurance coverage and bonding for large and complex civil construction projects, KRRC is proposing<sup>1</sup> that Mr. Steven A. Coombs be approved as a member of the BOC. Mr. Coombs is a licensed insurance producer and consultant and the President of *Risk Resources, Inc.*, an independent risk management and commercial insurance consulting firm headquartered in Chesterton, Indiana. Mr. Coombs has 40 years of experience in the insurance and risk management industry, with special expertise in construction risk management. A copy of Mr. Coombs' resume is attached for your further review and consideration.

Mr. Coombs informed KRRC that he will be unavailable to participate on the BOC for a five-month period (April through September) in 2020. KRRC does not believe that this period of unavailability presents an impediment to the work of the BOC, but calls this issue to your attention in connection with your consideration of Mr. Coombs' qualifications. Neither Mr. Coombs, nor his firm Risk Resources, Inc., have any prior affiliation with PacifiCorp or KRRC. AECOM is providing consulting services to KRRC in connection with the Lower Klamath Project, however, AECOM is not an affiliate of either

---

<sup>1</sup> KRRC is solely and exclusively responsible for convening the BOC and overseeing its work. PacifiCorp will coordinate with KRRC and the BOC to allow the BOC's work to be performed and completed consistent with the FERC's directives. Except as may otherwise be expressly provided by PacifiCorp, all responses, statements of fact, views, opinions, interpretations, and other communications related to the BOC are solely and exclusively attributable to the KRRC, are based on facts and information that are known to the KRRC, and are not attributable to PacifiCorp or any other party.



KRRC or PacifiCorp. Risk Resources has served as a subconsultant to AECOM for the Illinois State Tollway Highway Authority on an unrelated infrastructure project within the last 2 years. Risk Resources is still working on behalf of the Illinois State Tollway Highway Authority, however, AECOM's work on this project has been completed. Neither Mr. Coombs, nor his firm Risk Resources, Inc., have any prior knowledge or involvement with any work undertaken by AECOM (or any other consultant) on KRRC or PacifiCorp's behalf for the Lower Klamath Project.

KRRC respectfully requests that FERC approve Mr. Coombs to serve as a member of the BOC, given his relevant expertise as an insurance broker. As KRRC intends to convene the BOC on or before August 31, 2018, to commence its review of cost estimates, insurance, bonding, and financial resources available to KRRC, KRRC respectfully requests FERC's expedited consideration of this proposal.

Thank you, and we look forward to your response.

Sincerely,

*/s/ Mark Bransom*

Mark Bransom  
Chief Executive Officer  
Klamath River Renewal Corporation

Enclosure

cc: Dustin Till (PacifiCorp)  
Douglas Johnson, (D2SI) Portland Regional Engineer  
Robert Muncil  
Steven Coombs  
Service List (Transfer Application: P-2082-062; P- 14803-000)

# Steven A. Coombs

---

## Business Address:

Steven A. Coombs  
Risk Resources  
1050 Broadway, Suite 9  
Chesterton, Indiana 46304  
630-617-5229  
scoombs@riskresources.net

## Professional Experience:

### *Risk Resources, Inc.*

1992-Present President

- Provides insurance and risk management consulting services to clients relating to property and casualty insurance issues on a fee-for-service basis.
- Conducts feasibility studies to determine advisability of self-funding.
- Performs risk management audits on corporate organization and structure.
- Prepares specifications and administers competitive bidding process for client insurance programs.
- Serves as expert witness in insurance related litigation.

### *Corporate Policyholders Counsel, Inc., Park Ridge, Illinois (1984-1992)*

1990-1992 President and Chief Operating Officer

- Responsible for the overall activities of a risk management consulting firm, while continuing to provide professional services to several clients.

1986-1989 Senior Vice President and Treasurer

- Responsible for financial affairs, staff supervision and training.
- Conducted several client related projects including insurance and risk management audits, risk financing studies, captive feasibility assignments and formation of risk purchasing groups.

1984-1986 Consultant

- Conducted various risk management and insurance related assignments for clients within several different industries.

***Royal Insurance Company, Chicago, Illinois (1978-1984)***

1981-1984    Senior Underwriting Specialist – National Accounts

- Obtained expertise in negotiation and administration of cash flow casualty insurance programs including large deductibles, self-insurance and paid loss retrospective rating plans.
- Supervised large property/casualty programs written from six Midwestern branch offices.

1980-1981    Property and Casualty Underwriter – Grand Rapids, Michigan

- Performed underwriting activities in property and casualty areas.
- Acted as staff underwriting resources contact for other offices.

1978-1980    Package Underwriter – Southfield, Michigan

- Gained experience in basic property and casualty lines of coverage.

**Practical Construction Related Experience:**

- Forty years of experience in construction insurance and risk management as a lecturer, underwriter, consultant, researcher, teacher, author and drafter of insurance policies.
- Consulted on risk management and insurance for over a decade on the Tunnel and Reservoir Plan (TARP) for the Water Reclamation District of Greater Chicago. This project focused on a system of deep large diameter tunnels and reservoirs designed to reduce flooding and improve water quality. Construction costs amounted to \$2.33 billion.
- Consulted on risk management and insurance issues for 6 years on the reconstruction of Midway Airport Chicago, IL. Total construction costs amounted to over \$750 million.
- Consulted on risk management and insurance issues with three major sports stadiums in Illinois and Wisconsin.
- Consultant to Kenny Construction Co. for 25 years, including various civil construction projects such as roads, bridges, tunnels, electrical grids and sewage systems. Created a Risk Management program for Kenny.
- Consultant to W.E. O’Neil Construction Co. for over 30 years, including commercial and civil construction projects.
- Performed a risk management and insurance audit on the largest contractor in Canada.

- Consulted on over 100 CIPs on behalf of developers, project owners, design teams, construction managers, general contractors and trade subcontractors. Currently actively involved in a dozen CIPs, including five in California.
- Have performed risk management and insurance audits for scores of organizations.
- Serve as a consulting and testifying expert to law firms countrywide.

**Education:**

- Western Michigan University, B.B.A. – 1977
- Western Michigan University, Graduate Studies – 1980-1981
- Insurance Institute of America, Associate in Risk Management (ARM) – 1983
- American Institute, Chartered Property Casualty Underwriter (CPCU) – 1986
- DePaul University, M.A. – 1999 with a concentration in Risk Management and Insurance
- International Risk Management Institute, Construction Risk and Insurance Specialist (CRIS) – 2012

**Publications (last 8 years):**

- *“Builders Risk: New AIA Requirements”*, Expert Commentary, International Risk Management Institute, May 2018
- *“Learn Builders Risk Protective Safeguards and Warranties”*, Expert Commentary, International Risk Management Institute, December 2016
- *“Builders Risk: Separation of Insureds Clause”*, Expert Commentary, International Risk Management Institute, November 2015
- *“Builders Risk: Needed Changes to AIA General Conditions”*, Expert Commentary, International Risk Management Institute, May 2015
- *“Builders Risk: Tunnels and Underground Projects”*, Expert Commentary, International Risk Management Institute, February 2015
- *“Builders Risk: Minimizing Uncertainty at Bid Time”*, Expert Commentary, International Risk Management Institute, September 2014
- *“Wrap-Up Insurance Programs: Coverage Issues”*, The Policy, Illinois State Bar Association Section on Insurance Law, December 2013
- *“Inherent Coverage Issues in Controlled Insurance Programs”*, International Risk Management Institute, 2013 White Paper (co-authored)
- *“Builders Risk Lessons Learned from a Plant Explosion”*, Expert Commentary, International Risk Management Institute, December 2012
- *“Workers Compensation Guide: Coverage and Financing”*, The National Underwriter Company, 2012 (co-authored)
- *“Builders Risk Insurance Coverage Interpretation”*, Expert Commentary, International Risk Management Institute, July 2012
- *“Builders Risk: Naming of Insureds Reloaded”*, Expert Commentary, International Risk Management Institute, February 2012

- *"Builders Risk Insurance: The Other Insurance Condition"*, Expert Commentary, International Risk Management Institute, September 2011
- *The Builders Risk Book*, International Risk Management Institute, 2010 (co-authored)
- *"Builders Risk: Don't Overlook Contractors Policies"*, Expert Commentary, International Risk Management Institute, December 2010
- *"Builders Risk Insurance: As Their Interest May Appear"*, Expert Commentary, International Risk Management Institute, July 2010
- *"Builders Risk Insurance: Matching the Policy to The Project"*, The Risk Report, International Risk Management Institute, July 2010 (co-authored)

**Lectures (last 8 years):**

Stafford (February 8, 2018)

- *"Construction Builders Risk and CGL Insurance"* (webinar-co-presenter)

IRMI National Construction Insurance Conference (November 6, 2017)

- *"Builders Risk Insurance Requirements"*

BIG | Virtual University (November 16, 2016)

- *"Builders risk and Installation Floaters?"* (2-hour webinar)

IRMI National Construction Insurance Conference (November 9, 2015)

- *"Does Your Builders Risk Pass Inspection?"*

Mesirow Financial Construction Insurance Seminar (September 16, 2015)

- *"Unknown Exposures of Controlled Insurance Programs"*

IRMI National Construction Insurance Conference (November 10, 2014)

- *"Inherent Coverage Issues in Wrap-Ups"*

Women Construction Owners & Executives, USA (October 2, 2014)

- Best Practices in Risk Management

IRMI National Construction Insurance Conference (November 20, 2013)

- Are There Holes in Your Umbrella?

Illinois State Bar Association - Insurance, Surety Bonds and Bankruptcy Issues for Construction Projects (May 30, 2013)

- Wrap Up Insurance and OCIP/CCIP Programs

Willis Innovation and Trends Seminar (May 9, 2013)

- Builders Risk

Lorman Education Seminar - Everything a Construction Player Should Know About Insurance in Illinois- (January 29, 2013)

- Wrap-Ups

IRMI National Construction Insurance Conference (November 13, 2012)

- Builders Risk Coverage and Claims

Construction Financial Management Association- Chicago Chapter (April 18, 2012)

- Additional Insureds

IRMI National Construction Insurance Conference (November 15, 2011)

- Deconstructing the Wrap-Up Pro-Forma

Society of Risk Management Consultants Conference (October 8, 2011)

- Builders Risk Insurance

IRMI National Construction Insurance Conference (November 15, 2010)

- Digging Deeper on Wrap-Up Issues Frequent Insurance Concerns

Topco CFO Conference (November 5, 2010)

- Risk Management Insurance Issues and Opportunities

Society of Illinois Construction Attorneys Seminar (April 20, 2010)

- Insurance – Fundamentals and Emerging Issues for Construction Attorneys

Topco CFO Conference (September 19, 2009)

- Risk Management Opportunities

Chicago Roofing Contractors Association Seminar (September 15, 2009)

- Insurance Trends and Best Practices

### **Organizations:**

- Member – Chartered Property Casualty Underwriters (CPCU) (1984-Present)
- Member – CPCU – National Publications Committee (1990-1993)
- Chairman – Research Committee Chicago (West Suburban) CPCU Chapter (1990-1991)
- Member – Society of Risk Management Consultants (SRMC) (1989-Present)
- National Director – SRMC (1992-1994; 2004-2006)
- Chairman – SRMC – Paradigm Committee (1992-1994)
- National Secretary – SRMC (1994-1996)
- National President – SRMC (1996-1997)
- Member – SRMC – Public Relations Committee (1998-Present)
- Member – National Society of Insurance Premium Auditors (NSIPA) (1997-Present)