

SCOTT M. FRANCIS, P.E., PSP

Mr. Francis is a Vice President of Long International and has over 20 years of experience in project management, contract disputes analysis and resolution, CPM schedule preparation, execution, and analysis, productivity analysis, contract administration, design engineering, construction management, and government contracting. He is proficient in the use of Primavera Project Planner (P3) as well as Primavera Project Management (P6). Mr. Francis' experience includes projects valued over US\$3 billion in the chemical, oil and gas, refinery, power, utility, and commercial sectors. He provides schedule development and assurance services, cost estimating, and claims analysis services on projects for both owners and contractors. Specific responsibilities include CPM development and reviews, CPM schedule delay and acceleration analyses, document database development, change order impact analysis, issue identification, correlation of impacts to schedule activities, productivity evaluations, claims preparation, damages quantification, and arbitration/litigation support.

EDUCATION

B.S., Civil Engineering, Colorado State University, 1997

PROFESSIONAL REGISTRATIONS

Registered Professional Engineer, Colorado (No. 39084)

Registered Professional Engineer, Washington (No. 40814)

Planning & Scheduling Professional (No. 01762)

TECHNICAL EXPERIENCE

Representative U.S. and international technical experience includes:

- CPM schedule development and monthly progress reporting
- Schedule review and analysis, including As-Built But-For schedule analysis
- Time impact analysis (TIA)
- Acceleration analysis
- Productivity analysis
- Development of project management plans and procedures
- Schedule cost and resource loading
- Change order preparation, analysis, management, and review
- Field construction supervision
- Project billing and payment applications
- Submittal of Requests for Information (RFIs)
- Constructability reviews
- Contract writing, review, and administration
- Cost estimating

PROJECT EXPERIENCE

Mr. Francis' project experience includes the successful completion of projects for the U.S. Navy, general contractors, and design engineering firms. Additionally, he has evaluated claims on various projects valued over US \$3 billion. Representative projects include the following:

Refinery, Chemical, Oil & Gas, Power, and Industrial Projects

- Performed schedule delay analyses and rebuttal support work regarding a multibillion-dollar arbitration involving an in situ steam-assisted gravity drainage oil sands extraction facility in Alberta, Canada. The assignment included analysis of delays on the project in support of the contractor's defense against liquidated damages, as well as analysis and argument in the rebuttal of the owner and its experts in respect of the more than CAD\$1 billion in owner's claims against the contractor.
- Performed an As-Planned vs. As-Built schedule analysis, As-Built But-For schedule analysis, and Time Impact schedule analysis on a \$3 billion delay claim on an upgrade to an existing oil refinery. Assisted in preparing several expert reports on the analysis and a rebuttal to the opposing expert analysis.
- Rebuilt the project schedules and performed a detailed windows schedule analysis for a \$3 billion delay claim on a nuclear power plant project.
- Analyzed an EPC contractor's detailed CPM schedules associated with a \$138 million delay and disruption claim on a gas plant project in Saudi Arabia. Additionally, assisted in the calculation of the contractor's entitlement to damages, including delay, loss of productivity, and disputed value of unresolved change orders.
- Performed a schedule delay analysis and damages quantification for an equipment supplier in a claim against the general contractor on a refinery expansion project in Texas.
- Analyzed a delay claim associated with defective piping installation involving the expansion of a LNG plant in Canada.
- Analyzed a contractor's \$87 million claim on an offshore production facility fabricated in Norway to be installed in the Gulf of Mexico. Responsible for damage calculations related to cumulative impact and loss of productivity due to overtime work, shift work, and winter conditions. Assisted in the preparation of the expert report submitted for arbitration.
- Performed schedule development and maintenance for a \$190 million water treatment plant. The owner accepted the 8,000-activity cost and resource-loaded schedule upon the first submittal.
- Provided project management and project engineering services on several wastewater treatment plant upgrades. Responsible for contract administration, procurement of equipment and materials, and the change order process.

Government Projects

- Performed scheduling and updating services for a contractor involved in a Veterans Affairs hospital renovation project.
- Provided construction management services as the U.S. Navy's Construction Representative on a US\$6.4 million design/build undersea weapons testing facility.
- Provided construction management services as the U.S. Navy's Construction Representative on a US\$3.2 million design/build addition to an existing ammunition pier. Provided close coordination with base operations staff and the contractor to execute critical work during a tight construction window.

- Completed a US\$3.1 million, 25-mile road improvement project two months ahead of schedule for the U.S. Navy. Poorly written scope of work required diligent efforts with the customer to define all necessary road and parking lot improvements. Negotiated changes to incorporate all customer requirements at no additional cost.
- Provided construction management services on a US\$1.4 million ordnance transfer facility for the U.S. Navy.
- Negotiated a settlement with a contractor on a US\$1 million crane-painting project for the U.S. Navy. A poorly written scope of work resulted in unclear requirements for assembling the painting scaffolds. Provided consultation to the key players and presented a strong case for terminating the project, and awarding extra time and material costs to the contractor to compensate for costs expended.
- Led a U.S. Navy public works team in the facilities development for the implementation of the new MH-60 helicopter. Project involved substantial coordination and space management efforts to implement new operational and training facilities while keeping existing squadrons operational.
- Effectively managed the implementation of the Navy Marine Corps Internet service to all base tenant commands. All existing buildings were converted and retrofitted for the new service. Coordination around commands operational periods was necessary to provide service without interrupting the customer's mission.

Commercial, Municipal, and Utility Projects

- Performed a schedule delay analysis and productivity analysis for an electrical subcontractor working on a major highway project.
- Prepared a productivity analysis and expert report on behalf of a subcontractor working on a mixed residential/commercial facility. Prepared an expert report to be used in mediation.
- Prepared an expert report related to project management issues associated with the construction of a new hospital project.
- Prepared an expert report related to project management and schedule related issues associated with the installation of curtain wall in a residential tower complex.
- Defended against a delay claim on the construction of a high-end apartment building. Assisted in preparing the expert report.
- Prepared a detailed CPM schedule for a new hospital in Colorado. Performed schedule updates and prepared an insurance delay claim when construction was impacted by *force majeure* events. Delay claim involved rescheduling the remaining construction to account for necessary remediation.
- Prepared a detailed CPM schedule and updates for a general contractor associated with a lobby remodel of a high-end office building.
- Prepared a delay claim on a high-end apartment building. The claim was submitted on behalf of the contractor that resulted from owner design changes and subsequent procurement delays.
- Lead Design Engineer on the preliminary and final design of a water main and well collection system. The US\$1.2 million project involved close coordination and supervision in the crossing of two major natural gas lines. The projects' close proximity to a school caused several logistical problems that had to be identified and resolved prior to construction. All issues were resolved expeditiously and the system was operational ahead of schedule, which allowed other district clients the ability to accelerate community development.

- Managed and engineered a rapid design and award of two water pump stations to meet increasing district water demand. The US\$3.5 million project involved the management of design subcontracts and the review and implementation of all phases of the work. Diligent review of subcontractor work allowed for early bid and early construction completion.

PROFESSIONAL EXPERIENCE**Long International, Inc.***Denver, Colorado Area (August 2008 to Present)*

As Vice President of Long International, Mr. Francis provides schedule development and assurance services, cost estimating, and claims analysis services on projects for both owners and contractors. Specific responsibilities include CPM development and reviews, CPM schedule delay and acceleration analyses, document database development, change order impact analysis, issue identification, correlation of impacts to schedule activities, productivity evaluations, claims preparation, damages quantification, and arbitration/litigation support.

Western Summit Constructors, Inc.*Denver, Colorado (September 2005 to August 2008)*

As a Project Engineer/Project Manager/Scheduler, Mr. Francis was responsible for the management and support of field crews in the construction of water and wastewater treatment plants. As the Project Scheduler on a \$190 million water treatment plant, Mr. Francis led the scheduling and cost loading efforts on the project schedule. Other duties on previous projects included: development/cost loading/resource loading/analysis of project schedules, writing purchase agreements and subcontracts, procurement oversight, change order preparation and execution, and RFI submittal and management.

U.S. Navy – Civil Engineer Corps*Various Locations (April 2000 to August 2005)*

As an Assistant Resident in Charge of Construction, Mr. Francis managed the execution of over \$25 million in construction projects. As the team leader, Mr. Francis was responsible for overall customer satisfaction, and was the primary contact for all matters of the construction contract. As an Assistant Public Works Officer, Mr. Francis provided supervision, management, and professional direction to all-inclusive facilities organization. His position involved oversight of facilities planning, maintenance, and repair, renovations, transportation, utilities distribution and repair, and custodial and landscape contracts.

Meurer & Associates, Inc.*Lakewood, Colorado (January 1998 to March 2000)*

Mr. Francis served as a Design Engineer. In this role, he was responsible for the design and construction management of water and sewer infrastructure for Denver area water and sanitation districts. His responsibilities included preliminary and final design development, coordination among design consultants, and construction contractors, feasibility studies, water and sewer master planning, and constructability/conformance reviews of water and sewer projects.



PUBLICATIONS AND SPEAKING ENGAGEMENTS

“Contemporaneous Period Schedule Analysis Methodology,” *Long International, Inc.*, September 2015.

“CPM Construction Scheduling with Asta Powerproject,” *Long International, Inc.*, February 2015.

“Construction Labor Hour Productivity Claims – Success or Failure?” *Long International, Inc.*, November 2022.