

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination) DOCKET NO. 991462-EU
of Need for an Electrical Power)
Plant in Okeechobee County) FILED: Oct. 25, 1999
by Okeechobee Generating)
Company, L.L.C.)
_____)

DIRECT TESTIMONY

OF

WILLIAM F. SULLIVAN, JR., P.E.

ON BEHALF OF

OKEECHOBEE GENERATING COMPANY, L.L.C.

DOCUMENT NUMBER-DATE
13114 OCT 25 1999
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: PETITION FOR DETERMINATION OF NEED FOR THE
OKEECHOBEE GENERATING PROJECT, FPSC DOCKET NO. 991462-EU

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 Q: Please state your name, title and business address.

2 A: My name is William F. Sullivan, Jr. My business address is
3 7500 Old Georgetown Road, Bethesda, Maryland.

4

5 Q: By whom are you employed and in what position?

6 A: I am employed by PG&E Generating Company as Vice President,
7 Engineering.

8

9 Q: Please describe your duties with PG&E Generating.

10 A: My Department is responsible for the overall design and
11 engineering of projects for PG&E Generating. These
12 responsibilities entail site planning, facility layout,
13 evaluation of cooling alternatives and equipment selection.

14

15 Q: Please summarize your educational background and your
16 experience in power plant engineering, design, construction,
17 operations and maintenance.

18 A: I have over 27 years of experience as a manager and engineer
19 in power plant engineering, design, construction, operations
20 and maintenance. Prior to joining PG&E Generating, I spent
21 twelve years as Director of Generation Services and Project
22 Manager for the Manchester Street Station Repowering Project

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1 for New England Power Service Company. Prior to that, I held
2 Project Manager and Project Engineer positions with Stone and
3 Webster Engineering Corporation in Boston. I received a B.S. in
4 Mechanical Engineering and an M.S. in Mechanical Engineering from
5 Northeastern University. A copy of my resume', which summarizes
6 my educational background and work experience, is attached to this
7 testimony as Exhibit _____ (WFS-1).

8

9 **Q: Are you a licensed professional engineer?**

10 A: Yes. I am a licensed professional engineer in the
11 Commonwealth of Massachusetts and the State of Rhode Island.

12

13 **Q: Have you previously testified before regulatory authorities
14 or courts?**

15 A: Yes. I testified before the Rhode Island Energy Facilities
16 Siting Board.

17

18 **Q: What is the purpose of your testimony?**

19 A: The purposes of my testimony is to provide engineering and
20 technical information regarding the design of the Okeechobee
21 Generating Project to the Florida Public Service Commission.

22

23 **Q: What are your responsibilities with respect to the Okeechobee
24 Generating Project that is the subject of this proceeding?**

25 A: My department is responsible for the engineering and

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 technical design of the generating facility. I have
2 supervisory responsibility for all aspects of the Okeechobee
3 Generating Project's ("Project") design.

4

5 **Q: Are you sponsoring any exhibits to your testimony?**

6 **A:** Yes.

7 WFS-1. William F. Sullivan's resume' and work experience
8 summary.

9 WFS-2. Okeechobee Generating Project Site Plan

10 WFS-3. Okeechobee Generating Project Plot Plan

11 WFS-4. Plant Performance Table

12 WFS-5. Design Basis

13 WFS-6. Process Flow Schematic

14 WFS-7. Plant Water Balance

15 WFS-8. One-line Electrical Diagram

16 WFS-9. Project Engineering, Procurement and Construction
17 Schedule

18 WFS-10. Okeechobee Generating Project Site Location
19 Relative to Local Landmarks and Zoning
20 Designations

21 I am also sponsoring Figures 3- 8, 13, Tables 1 and 2
22 and the associated narrative text relating to my testimony at
23 pages 1-4, 8, 15, 17, 21, 25, 35-36, 41, 43, 54 and 69 of
24 those Exhibits.

25

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 **Q: Please summarize the Okeechobee Generating Project.**

2 A: The Okeechobee Generating Project is a natural gas-fired
3 combined cycle generation facility. The plant consists of
4 two combustion turbine generators (CTGs), two heat recovery
5 steam generators (HRSGs) and two steam turbine generators
6 (STGs). The system is configured so that each power train
7 operates independently of the other, increasing reliability
8 and dispatchability. The plant will have 550 MW (nominal) of
9 net generating capacity at ISO temperature and relative
10 humidity. The Project's rated winter capacity will be 561.3
11 MW and its rated summer capacity will be 514.3 MW. The
12 Project will utilize state-of-the-art dry low-NO_x combustion
13 technology to minimize emissions of oxides of nitrogen (NO_x).
14 In addition, a Selective Catalytic Reduction ("SCR") system
15 will be used to further reduce NO_x.

16

17 **Q: Please describe the SCR system that will be used for NO_x**
18 **reduction at the Project.**

19 A: The SCR system for the Project will consist of a catalyst and
20 an ammonia injection grid located within the heat recovery
21 steam generator. Ammonia reacts with NO_x in the presence of
22 the catalyst which reduces the NO_x to elemental nitrogen and
23 oxygen.

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 Q: Please give a brief description of the site for the
2 Okeechobee Generating Project.

3 A: The facility will be located north-northeast of Lake
4 Okeechobee, in a rural area approximately 5 miles southeast
5 of the City of Okeechobee, Okeechobee County, Florida. The
6 facility will be located on approximately 40 acres of an
7 approximately 771 acre site situated to the west of Nubbin
8 Slough along the northern side of State Route 710. The site
9 is cleared and located on level ground. An access road will
10 be constructed to the site from State Route 710. Exhibit
11 _____ (WFS-10) shows the location of the facility in relation
12 to the City of Okeechobee.

13
14 Q: Please describe the general arrangement and layout of the
15 Project on the site.

16 A: The facility will use approximately 40 acres of the site
17 approximately one-half mile north of State Route 710. The
18 general arrangement for the site is shown on the site plan,
19 Exhibit _____ (WFS-2). The facility's "footprint" has been
20 located and designed to minimize the disturbance of wetlands
21 on the site while still providing close proximity to
22 transportation and utility corridors.

23
24 Q: Please describe the generating technology of the Okeechobee
25 Generating Project.

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1 A: The facility will be a state-of-the-art combined cycle
2 generating plant. The facility will use two advanced
3 technology combustion turbine generators manufactured by ABB
4 (or equivalent), two heat recovery steam generators and two
5 steam turbine generators to produce 528.2 MW of generating
6 capacity at annual average site conditions.

7

8 Q: Please summarize the performance characteristics of the
9 Okeechobee Generating Project.

10 A: The performance characteristics of the generating facility
11 are summarized in the Plant Performance Table, Exhibit _____
12 (WFS-4). Facility generating output and emissions data are
13 provided at various expected site ambient conditions at full
14 and part load operation.

15

16 Q: Please describe the process flow of the Project.

17 A: The process flow of the Project is depicted in the Process
18 Flow Schematic, Exhibit _____ (WFS-6). That depiction is
19 accurate and incorporated by reference into my answer.

20

21 Q: Please describe the design basis for the Project.

22 A: The design basis is attached as Exhibit _____ (WFS-5). That
23 description is accurate and incorporated by reference into my
24 answer.

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 Q: Please summarize the starting and emergency power supplies
2 for the Project.

3 A: The facility will obtain station service and start-up power
4 from the local utility serving Okeechobee County in order to
5 maintain normal house loads during periods in which the
6 facility is off-line and to accelerate the combustion turbine
7 generators to a self sustaining operation speed during start-
8 up. In the event of a loss of the transmission system,
9 emergency power for the plant will be provided from a
10 stationary battery system for one hour. After one hour,
11 emergency power will be provided for by the plant's emergency
12 diesel generators. The facility's emergency diesel
13 generators will be capable of providing sufficient power for
14 safe shutdown of each unit but will not be capable of
15 restarting the units.

16

17 Q: Please give a brief description of the control systems for
18 the Okeechobee Generating Project.

19 A: The plant is controlled by a Distributed Control System
20 (DCS). The control system is designed to provide full
21 automation of each unit. The gas turbine sequencer allows
22 the operator to start and stop the gas turbine automatically.
23 Operator stations are designed to allow a graphical,
24 intuitive navigation through the plant processes from a
25 central control room.

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 Q: Please summarize the environmental profile of the Okeechobee
2 Generating Project.

3 A: The facility will be fueled by natural gas and use state-of-
4 the-art combustion technology to limit emissions. Dry low-
5 NOx combustors will be utilized in conjunction with SCR, as
6 described earlier, to reduce NO_x emissions to 2.5 parts per
7 million on a dry volume basis adjusted to 15% O₂. The
8 Project's emission profile at various site ambient and load
9 conditions is shown in the Plant Performance Table, Exhibit
10 _____ (WFS-4).

11

12 Q: Please summarize the projected water requirements and water
13 supply plan for the Okeechobee Generating Project.

14 A: The projected water requirements for the Project are
15 summarized in the Plant Water Balance, Exhibit _____ (WFS-7).
16 The facility's maximum water consumption will be
17 approximately 5.4MGD. The Project's primary source of make-
18 up water to the cooling towers will be surface water provided
19 from the South Florida Water Management District's
20 channelized Canal C-59 at the Taylor Creek/Nubbin Slough.
21 On-site groundwater wells are expected to provide back-up
22 water supply during extreme drought conditions, if needed.
23 The Project will use wet cooling towers to condense steam
24 back to water for reuse in the HRSGs and STGs.

25

DIRECT TESTIMONY OF WILLIAM F. SULLIVAN, JR., P.E.

1 Q: Please describe the engineering, procurement, and
2 construction schedule for the Project.

3 A: The facility's projected schedule is provided in the Project
4 Schedule, Exhibit_____ (WFS-9). That schedule is accurate
5 and incorporated by reference into my answer. The facility
6 is planned to commence commercial operation in April, 2003.

7

8 Q: What is the current status of the engineering design work for
9 the Okeechobee Generating Project?

10 A: Conceptual engineering for the Project is under way. A site
11 plan, water balance, and process flow diagram are complete.
12 In addition, site wetlands have been delineated and
13 topographic mapping of the site has been completed.

14

15 Q: Does this conclude your direct testimony?

16 A: Yes.

WILLIAM F. SULLIVAN, JR., P.E.

Vice President, Engineering
PG&E Generating

EXPERIENCE SUMMARY

Currently Vice President, Engineering, responsible for all Engineering and Design at PG&E Generating, including plant engineering for operating power plants, and project engineering for power plants in construction and power plants in development.

Prior to PG&E Generating's acquisition of New England Power Company generating stations, Mr. Sullivan was Director of Generation Services, responsible for providing Engineering and Construction Services to New England Power Company's thermal and hydro power stations and retail affiliates. His group also provided Energy Related Services to external company customers.

Also, while at New England Power Service Company, Mr. Sullivan was the Project Manager for the 500 MW Manchester Street Station Repowering Project. The project was completed two months ahead of schedule and significantly under budget.

Mr. Sullivan has 27 years of experience in the engineering and construction industry. His responsibilities have included engineering, design, construction and project management.

Before joining New England Power Service Company, Mr. Sullivan was a Project Manager/Project Engineer for Stone & Webster Engineering Corporation (SWEC). Mr. Sullivan was assigned as Project Manager/Project Engineer for the Detroit Public Lighting Department - Mistersky Station Continuing Services Contract; Project Engineer for Tampa Electric Company - Gannon Station Unit 4 Hot Reheat Line Replacement Project; and Project Engineer for New England Power Company - Salem Harbor Station and Brayton Point Oil Ash Removal Study.

Mr. Sullivan was also assigned to the Consolidated Edison Co. Life Extension Project as a Mechanical Engineer; to the SWEC Reference Fossil Power Plant as Lead Mechanical Engineer; to the North Omaha Station Life Extension Project as a Mechanical Engineer; to the Gannon Station Coal Conversion Project as a Power Engineer; to the SWEC Industrial Reference Power Plant Project as the Lead Power Engineer; to the New Boston and Mystic Station Coal Conversion Projects as the Principal Mechanical Engineer; to the Brayton Point Coal Conversion Project as the Lead Power Engineer; to the Malakoff Electric Generating Station Project as the Principal Piping Engineer; and as the ASME N-5 Engineering Site Administrator assigned to the Millstone Nuclear Power Station - Unit 3 Project.

Prior to rejoining SWEC, Mr. Sullivan was Chief Mechanical Engineer for Kaiser Engineers, where his responsibilities included the design and construction of all mechanical systems on the Southwest Corridor Rapid Transit Relocation Project.

During Mr. Sullivan's original employment with SWEC, he was assigned as a Mechanical Engineer in the Nuclear Engineering Group on the Millstone Nuclear Power Station - Units 2 and 3 Projects, and in the Facilities Engineering Group as an Engineer in the Mechanical Engineering Group of the Shoreham Nuclear Power Station Project, and in the Nuclear Engineering Group on the Preliminary Liquid Metal Fast Breeder Reactor Project.

While attending Northeastern University, Mr. Sullivan held co-op work assignments at Dynatech Research and Development Corporation and GTE Sylvania, Inc.

EDUCATION

NORTHEASTERN UNIVERSITY
Master of Science - Mechanical Engineering 1976

NORTHEASTERN UNIVERSITY
Bachelor of Science - Mechanical Engineering 1973

LICENSES AND REGISTRATIONS

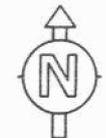
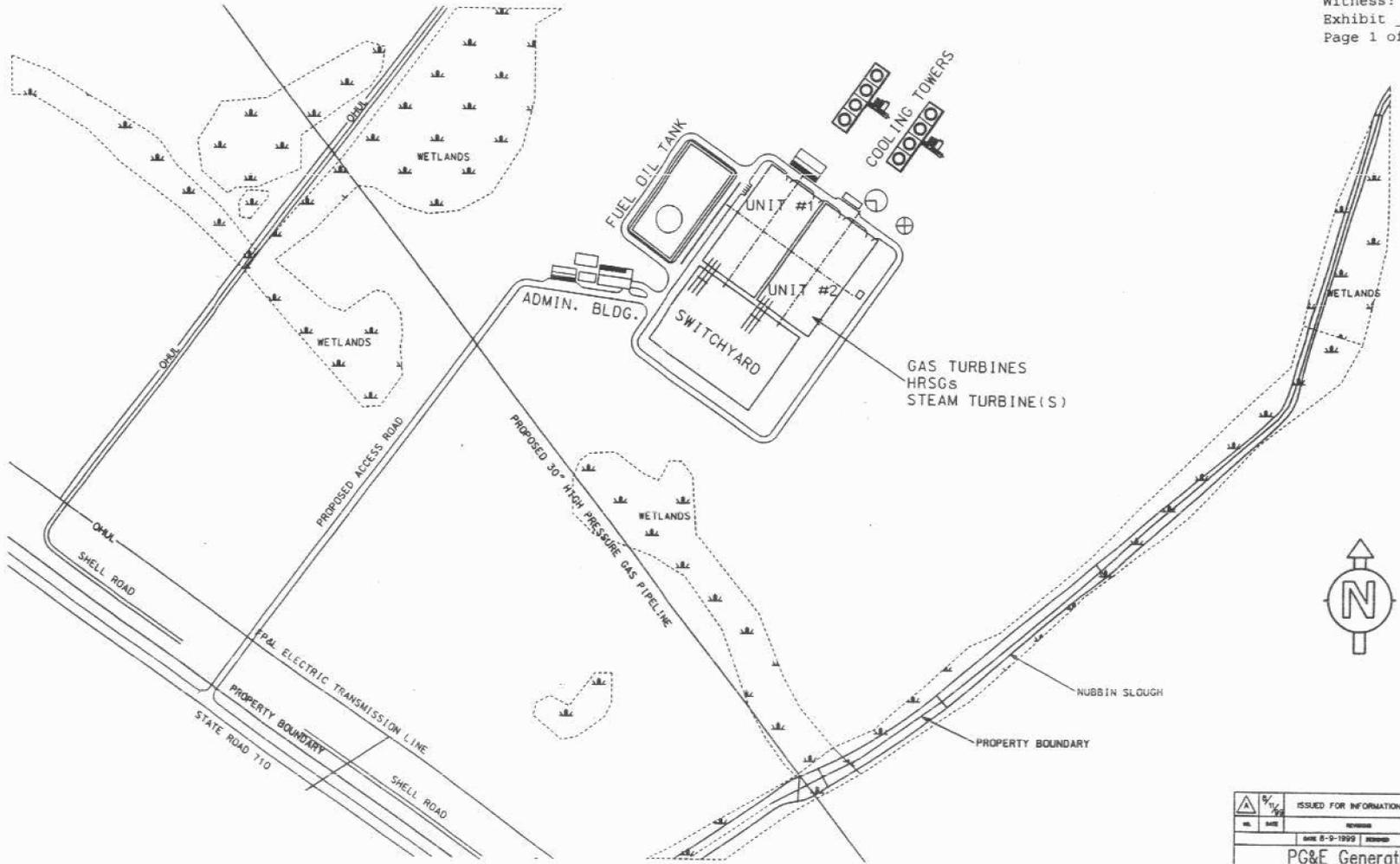
- Professional Engineer - Massachusetts and Rhode Island

PROFESSIONAL AFFILIATIONS

- Tau Beta Pi, National Engineering Honor Fraternity - Member
- Pi Tau Sigma, National Mechanical Engineering Honor Fraternity - Member
- Member of North American Electric Reliability Council (NERC) Security Committee

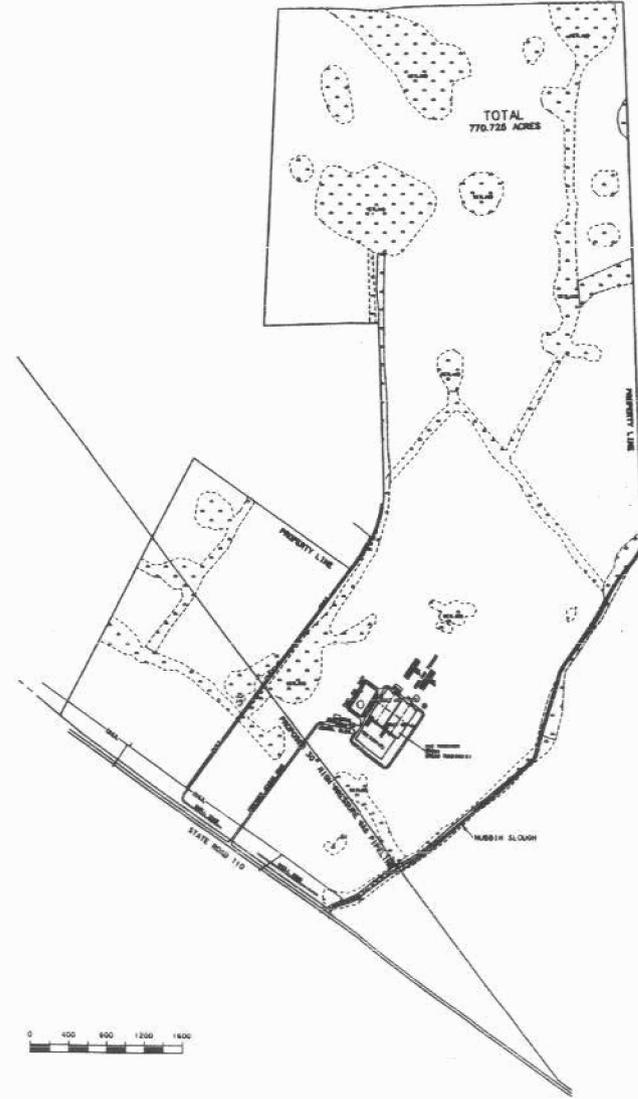
TABLE 2
Okeechobee Generating Project
Estimated Plant Performance (Per Unit Values)
Combined Cycle Generating Facility
Two ABB GT24 Combustion Turbine Generators
Two Unfired Heat Recovery Steam Generators
Two Condensing Steam Turbine Generators

	Case 1	Case 2	Case 3	Case 4	Case 5	Case 6	Case 7	Case 8	Case 9	Case 10	Case 11	Case 12	Case 13
Conditions													
Load %	100	100	100	100	100	75	75	75	75	50	50	50	50
Amb. Temp. (*F)	40	59	73	95	95	40	59	73	95	40	59	73	95
W.B. Temp. (*F)	32	51.5	69	77	77	32	51.5	69	77	32	51.5	69	77
Relative Humidity (%)	38%	60%	82%	45%	45%	38%	60%	82%	45%	38%	60%	82%	0.447563
Steam Inj.	Off	Off	Off	Off	On	Off							
Evap. Cooler	Off	On	On	On	Off								
Location Cond.													
CIT (*F)	40	52.625	69.6	79.7	95	40	59	73	95	40	59	73	95
Elevation (ft above sea level)	25	25	25	25	25	25	25	25	25	25	25	25	25
Pressure (psia)	14.67	14.67	14.67	14.67	14.67	14.67	14.67	14.67	14.67	14.67	14.67	14.67	14.67
Unit Performance													
Exhaust Flow (kip/hr)	3,216	3,154	3,052	2,984	3,036	2,634	2,554	2,479	2,346	2,160	2,095	2,031	1915.575
Steam Injection	0	0	0	0	1	0	0	0	0	0	0	0	0
Gross Output (kW)	285,667	280,000	269,076	262,163	267,386	223,894	214,088	204,564	186,972	162,255	153,842	145,997	133138.8
Heat Input (MMBtu/hr HHV)	1,907	1,865	1,789	1,739	1,777	1,487	1,430	1,376	1,279	1,145	1,098	1,052	969.1373
Gross Heat Rate (BTU/kWhr HHV)	6,676	6,668	6,649	6,635	6,645	6,644	6,678	6,725	6,842	7,059	7,138	7,207	7279.153
Auxiliary Load (kW)	5,000	5,000	5,000	5,000	5,000	4,500	4,500	4,500	4,500	3,900	3,900	3,900	3900
Net Output (kW)	280,667	275,000	264,076	257,163	262,386	219,394	209,588	200,064	182,472	158,355	149,942	142,097	129238.8
Net Heat Rate (Btu/kWhr HHV)	6,795	6,782	6,775	6,764	6,772	6,780	6,822	6,876	7,011	7,233	7,324	7,405	7498.813
Plant Output													
Net Plant Output (kW)	561334	550000	528152	514325	524773	438787	419175	400129	364944	316711	299884	284194	258477.5
Stack Emissions per Unit													
NOx, ppmvd @ 15% O2	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
NOx, lb/hr	18.9	18.5	17.8	17.4	17.7	14.9	14.4	13.9	13.1	11.3	12.3	11.9	10.15423
SO2, lb/hr	9.9	9.7	9.3	9.1	9.3	7.8	7.5	7.2	6.7	6.0	5.7	5.5	5.1



ISSUED FOR INFORMATION									
NO.	DATE	BY	CHK.	APP.	NO.	DATE	BY	CHK.	APP.
001	08-10-1999	MAAD			002				
PG&E Generating Company BETHESDA, MARYLAND									
OKEECHOBEE GENERATING PROJECT OKEECHOBEE COUNTY, FL									
FIGURE 4 SITE PLAN									
PG&E Gen		DRAWING NO.			REV.				
		FL-SITE			A				

FPSC Docket No. 991462-EU
 OGC
 Witness: Sullivan
 Exhibit _____ (WFS-3)
 Page 1 of 1



A	10/22	ISSUED FOR INFORMATION							
NO.	DATE	REVISION	BY	CHK	APP	DATE	APP	DATE	APP
		DATE 8/15/1999	DESIGNED		CHECKED	MAB			
PG&E Generating Company BETHESDA, MARYLAND									
OKEECHOBEE GENERATING PROJECT OKEECHOBEE COUNTY, FL									
FIGURE 5 PLOT PLAN									
PG&E Gen		DRAWING NO.		REV.					
		FL-PLOT		A					

DESIGN BASIS

INTRODUCTION

The Energy Facility is a highly efficient combined cycle electric power plant that will be fueled by natural gas. The Facility will be nominal rated to produce 550 MW at standard site conditions.

This section describes the Facility and its supporting systems. It also includes a general location map, a preliminary site plan and a map detailing the preliminary water, gas, and electrical interconnect routes.

PROJECT LOCATION

The Facility will be located just north of Lake Okeechobee, in a rural area approximately 5 miles southeast of the City of Okeechobee, Okeechobee County, Florida. The Facility will be located on approximately 40 acres of an approximately 771 acre site situated to the west of Nubbin Slough along the northern side of State Route 710. The site is cleared and located on fairly level ground. An access road will be constructed to the site from State Route 710. Exhibit 2 shows the location of the Facility.

The Gulfstream Natural Gas System (Gulfstream) natural gas pipeline is planned to cut across the southern portion of the site south of the proposed facility as illustrated in Exhibit 2. FP&L's Sherman substation is located approximately 3 miles to the northwest of the Facility. FP&L 230kV electric transmission lines between the Sherman and Martin substations transverse the site.

OVERVIEW

The proposed Energy Facility will consist of two combustion turbine generators, two heat recovery steam generators (HRSG) equipped with selective catalytic reduction (SCR) and steam turbine(s). The combustion turbines will generate approximately two thirds of the Facility's output. Energy will be recovered from the hot combustion gases exiting the combustion turbines and will be used to generate steam in the HRSGs. Steam from the HRSGs will be expanded through steam turbines which will produce the balance of the Facility's output. This process of utilizing both the power generated in the combustion turbines as well as that generated by the steam turbines is commonly

referred to as "combined cycle" generation. Cooling water will be used in conjunction with cooling towers to condense steam back to water for reuse in the HRSGs. The Facility's primary water supply will be provided from the convergence of SFWMD channelized canals L-63N, L-63S and L-59. A process diagram for the plant is included in Exhibit 6.

The Facility will emit NO_x (nitrogen oxides), CO (carbon monoxide), non-methane hydrocarbons, small quantities of particulate (PM₁₀), and sulfur oxides (SO_x). The Facility will be designed to control NO_x using an advanced Dry Low-NO_x combustion system and a Selective Catalytic Reduction (SCR) system. This represents state-of-the-art emissions control technology, capable of achieving approximately 2.5 ppmvd NO_x levels. Only trace amounts of SO₂ will be emitted when burning natural gas. CO and non-methane hydrocarbon emissions will be minimized through the use of good combustion practice.

FACILITY DESCRIPTION

Facility Structures and Buildings

The Energy Facility will include the following structures and buildings:

- A common control room, warehouse and administration building which will contain a workshop, a maintenance area, and offices.
- Each HRSG will be located adjacent to its combustion turbine and will connect to an approximate 200 foot high emission stack. There will be one stack for each unit.
- Mechanical induced draft evaporative cooling towers.
- Water storage tanks.
- An electrical switchyard.

Combustion Turbine

The Facility will employ industrial frame advanced technology combustion turbines equipped with dry low-NO_x combustors. The CT will be housed in an enclosure

**DESIGN BASIS
(continued)**

which provides thermal insulation, acoustical attenuation, and fire extinguishing media containment. The enclosure will allow access for routine inspections and maintenance.

Heat Recovery Steam Generators ("HRSGs")

One of the significant features of a combined cycle plant is the utilization of the hot exhaust gas from the combustion turbine to produce steam which, in turn, is expanded in a steam turbine to drive an electric generator and produce electricity. The Heat Recovery Steam Generator (HRSG) is the key piece of equipment necessary to the production of this steam.

The HRSGs will be multiple-pressure, reheat units. The various pressure sections will each consist of economizer, evaporator and superheater sections. The HRSGs will also be equipped with a reheater to further improve cycle efficiency.

Steam Turbine ("ST")

The ST will be a multiple admission, reheat, condensing turbine designed for sliding pressure operation. The HP portion of the ST receives high pressure superheated steam from the HRSG and then exhausts steam into the reheat section of the HRSG. Reheated steam from the HRSG is supplied to the IP turbine, and the IP turbine exhausts into the low pressure LP turbine. The LP turbine receives low pressure superheated steam from the HRSG and exhausts steam into the condenser.

Stack

Combustion turbine combustion gases will discharge through an approximate 19 foot diameter, 200 foot high carbon steel stack. The stack will be designed to minimize the potential for aerodynamic down wash of stack emissions.

Cooling System

After the steam passes through the steam turbine it is condensed in a shell and tube heat exchanger (surface condenser) utilizing cooling water from the cooling tower. Each condenser will include a shell, tubes, a water box, and hot well. Condensed water in the hot well is pumped back to the the HRSG to begin the thermal cycle again.

DESIGN BASIS
(continued)

Cooling water for the condensers will be provided from evaporative (wet) induced draft cooling towers. Fans at the top of the cooling tower maintain a draft within the cooling tower. The water will be cooled by evaporation as it falls through baffles from the top of the cooling tower to a basin at the bottom of the tower where it is again pumped back through the condenser. Cooling tower components will include a basin, fans, fan decks, drift eliminators, fill material (baffles), and other necessary components. A preliminary water balance is shown in Exhibit 7. Maximum water usage will be approximately 5.33 million gallons per day (3,700 gpm) when operating at 90° F, 60% relative humidity while operating both the evaporative cooler and steam injection systems.

Fuel Supply and Storage Systems

Natural gas will be the primary fuel for the Facility. The Facility's gaseous fuel system will interconnect to the Gulfstream gas metering station located at the site boundary. Gas scrubbers will be provided to remove particulate and moisture from the gas prior to use in the combustion turbines. The gaseous fuel system will also include fuel gas heaters, meters and isolation system in accordance with governing engineering codes.

Distillate fuel oil will be used as the back-up fuel source. Fuel oil will be stored on-site to support continuous operation for 24 hours in the event of interruption of natural gas service. The fuel oil tank capacity will be 650,000 gallons. Fuel oil will be delivered to the site via tanker trucks.

Condensate and Feedwater Systems

The condensate system will deliver deaerated water from the condenser hotwell to the HRSG. The condensate system will also provide water to other facility subsystems.

The feedwater system will provide feedwater to the economizer sections of the HRSG. The feedwater system will also supply water to interstage desuperheaters.

Demineralized Water System

The demineralizer plant will consist of either a permanently installed or mobile demineralizer system to produce demineralized water for the Facility from the raw

water source. The product water from the demineralizer system will be stored in a demineralized water storage tank for use as steam cycle makeup.

The demineralized water storage tank will provide both the demineralized water and condensate storage functions of the plant. The tank will be constructed of lined carbon steel.

Demineralizer system regeneration and treatment will be done at the Energy Facility or off-site depending on the selected system.

Boiler Feedwater Treatment

These systems will typically consist of hydrazine for oxygen scavenging (injected into condensate system); phosphate for boiler water solids control (utilized in the HRSG steam drums); and ammonium hydroxide for pH control (fed into condensate).

Waste Water Treatment System

The process waste streams will be combined, collected, and disposed of separately or in combination, depending on the type of treatment required and the ultimate discharge point. Plant wastewater that could potentially contain small quantities of oil (including the plant area washdown floor drains, equipment and sample drains) will be treated in an oil/water separator, where the clean effluent may be recycled for use as cooling tower makeup. Oil and sludge collected in the oil/water separator will be disposed of off-site. Wastewater grab sample points will be provided in accordance with the requirements of all applicable permits.

Sanitary waste will be routed to an on-site septic tank for disposal. 1,440 gallons of sanitary waste will be generated per day.

HRSG blowdown will be collected in a dedicated sump and either recycled to the cooling tower basin or discharged to Nubbin Slough. Cooling tower blowdown will be routed to Nubbin Slough.

Spill prevention and control measures will include dikes around fuel oil tanks, acid tanks, and hypochlorite tanks. The dikes will be sized to contain a volume larger than that of the enclosed tank. Curbed enclosures will be provided for boiler feedwater

treatment chemicals and water pretreatment chemicals (including hypochlorite) which will be stored in their delivery containers.

Oil-filled transformers will be located in a rock-filled sump. Storm water that collects in the sumps will drain to a common corner sump.

Compressed Air System

The compressed air system will be designed to provide dry, oil-free, control air for plant instrumentation, controls and maintenance activities.

The primary source of plant compressed air will be from permanently installed air compressors. The instrument air supply will be oil-filtered and dried. The system will also include a compressed air receiver.

The system will be complete with piping, valves, locally mounted instrumentation, and controls.

Fire Protection System

An on-site fire protection system will be provided for the plant. The water supply for the fire protection system will be stored on-site in either the raw water tank or cooling tower basin. A main underground fire header will be provided to serve strategically placed yard hydrants and sprinkler/deluge systems for the facility.

The fire water distribution system will incorporate sectionalizing valves so that a failure in any part of the system can be isolated while allowing the remainder of the system to function properly.

The fire protection system will also include:

- An extinguishing system for the gas turbine/generator set
 - Dry pipe, automatic sprinkler system to envelop, as required, oil piping and equipment associated with the steam turbine lube oil system.
 - Wet pipe sprinkler systems for the turbine building and warehouse storage area
- A protective signaling system with main panel in the control room

Control System

DESIGN BASIS
(continued)

Each unit will have a state-of-the-art, integrated microprocessor based control system for plant control, data acquisition, and data analysis. The plant control system will provide for startup, shutdown, and control of plant operation within limits and for protection of equipment.

Electric Power System

The electric output of each of the Facility's generators will be connected to a main step-up transformer. The output from the main step-up transformers will be connected to the Facility's on-site switchyard.

Emissions Monitoring

An emissions monitoring system for airborne pollutants will be installed to provide monitoring and alarming of NO_X and CO concentrations in the HRSG exhaust systems. This system will either be a continuous emissions monitoring system (CEMS) or a software based predictive emissions monitoring system (PEMS). The emissions monitoring system will provide input signals to the microprocessor based data acquisition system, previously described, and will meet all the requirements of the Florida Department of Environmental Protection (FDEP) for monitoring and reporting.

Stormwater Drainage

A permanent stormwater management basin will be provided to collect stormwater from the Facility. Stormwater will be collected by a system of drains and catch basins and which will connect to underground piping providing a gravity drain system. The basin will be sized to allow collected sediment to settle out before it is discharged, as well as to ensure that peak runoff rates are not increased.

Associated Facilities

Natural gas will be provided to the facility from a natural gas pipeline to be constructed by Gulfstream. The pipeline will traverse the property to the south of the plant and north of S.R. 710. Exhibit 2 depicts the pipeline route across the property. A gas metering station will also be provided for on the site.

Figure 8

Okeechobee Generating Project Process Flow Schematic

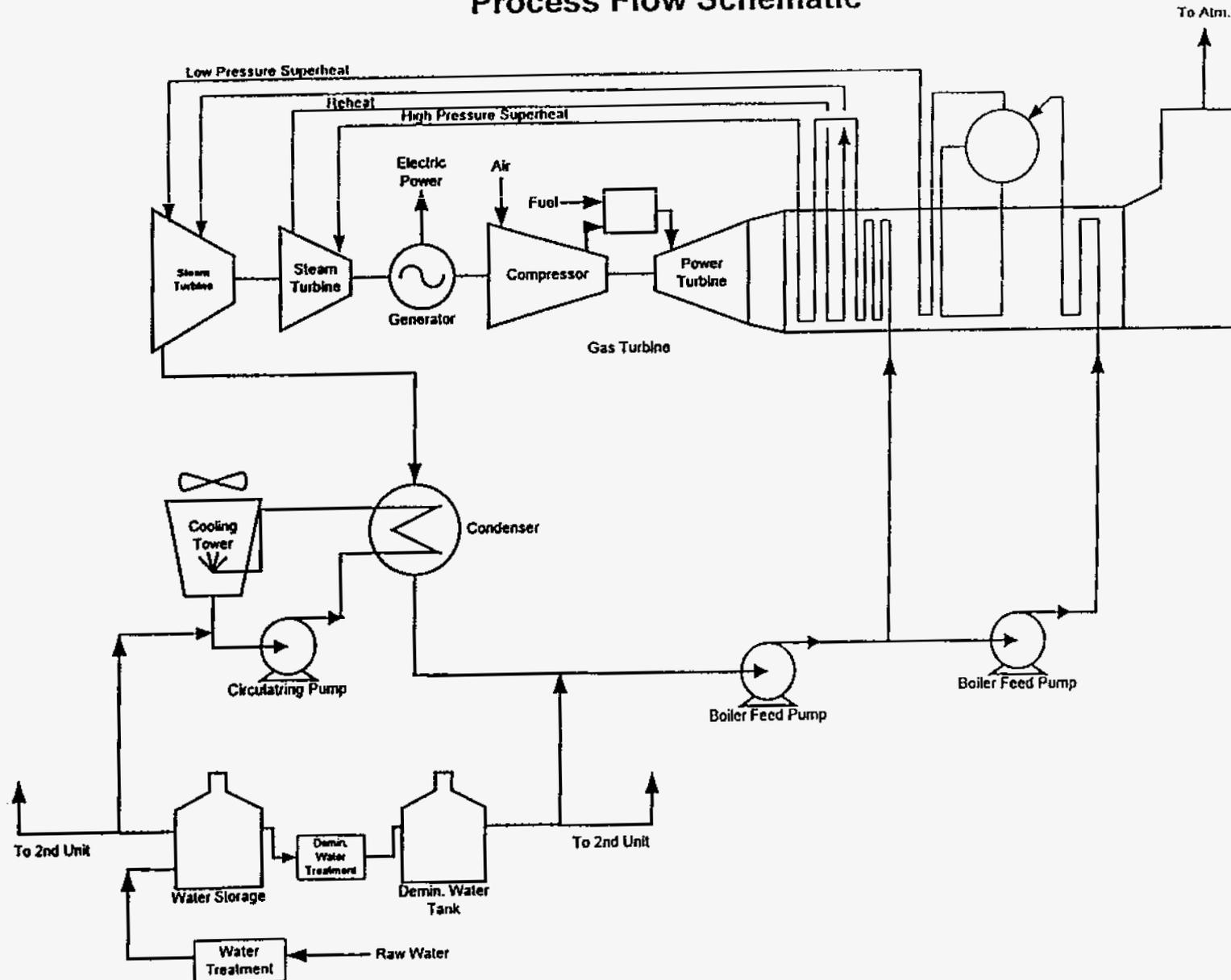
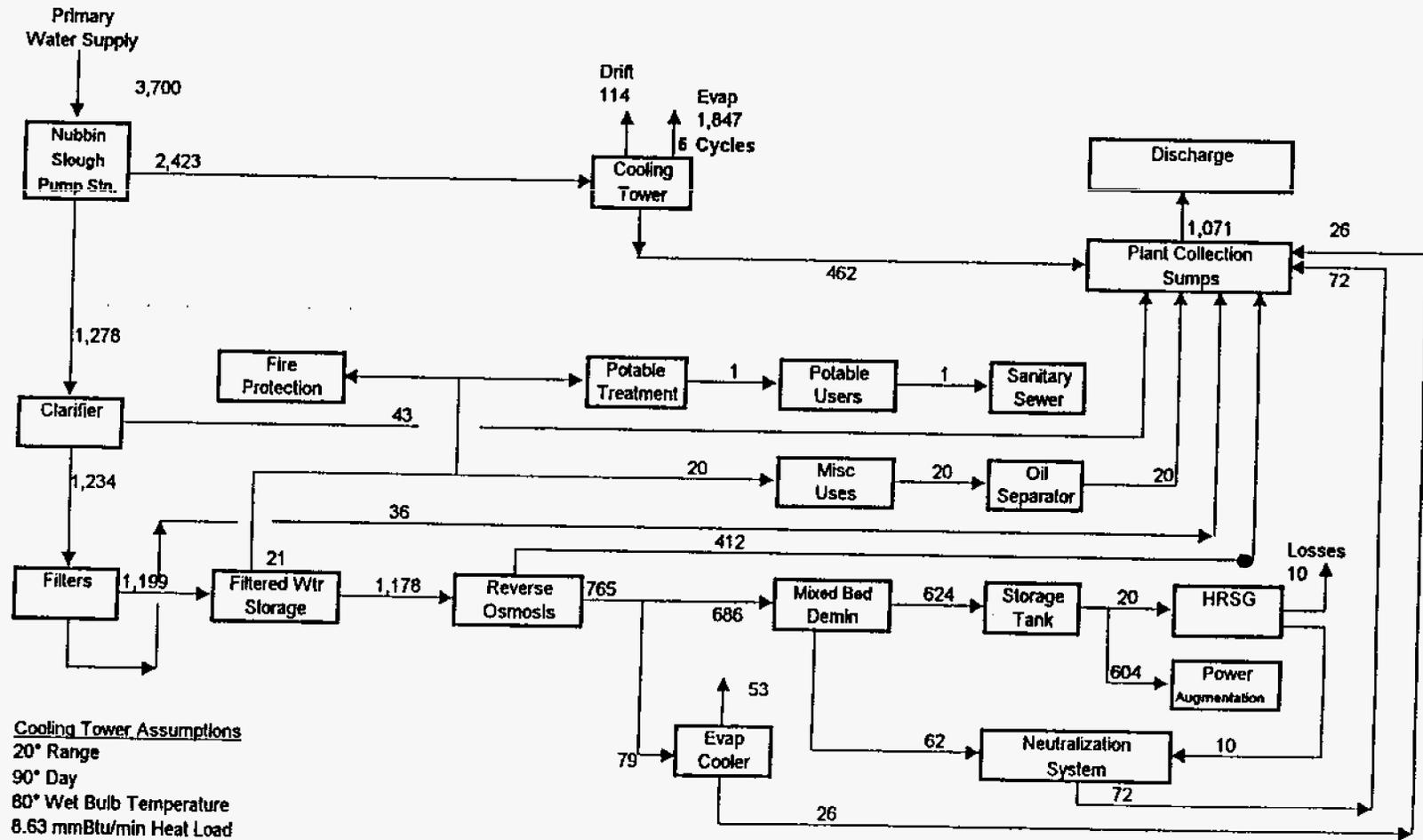


FIGURE 7
Okeechobee Generating Project
Preliminary Water Balance
(Peak Summer Day)



Cooling Tower Assumptions
 20° Range
 90° Day
 80° Wet Bulb Temperature
 8.63 mmBtu/min Heat Load
 Natural Gas
 Summer Peak Conditions

TRANSMISSION LINE No. 1
MARTIN SUBSTATION

TRANSMISSION LINE No. 2
SHERMAN SUBSTATION

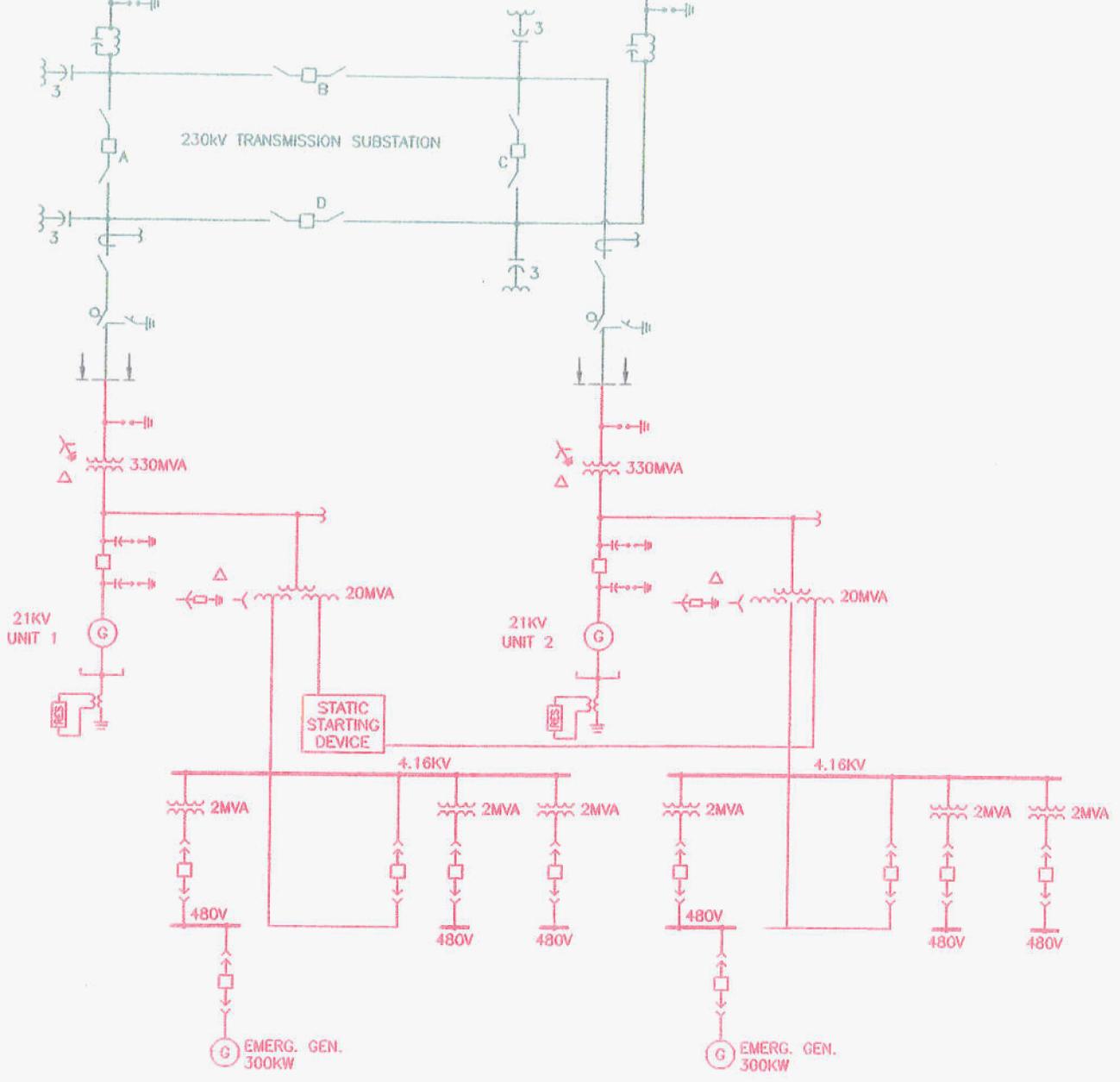
FPSC Docket No. 991462-EU

OGC

Witness: Sullivan

Exhibit _____ (WFS-8)

Page 1 of 1



LEGEND

- LIMIT OF REGIONAL SWITCHING AND TAGGING JURISDICTION

NOT FOR CONSTRUCTION

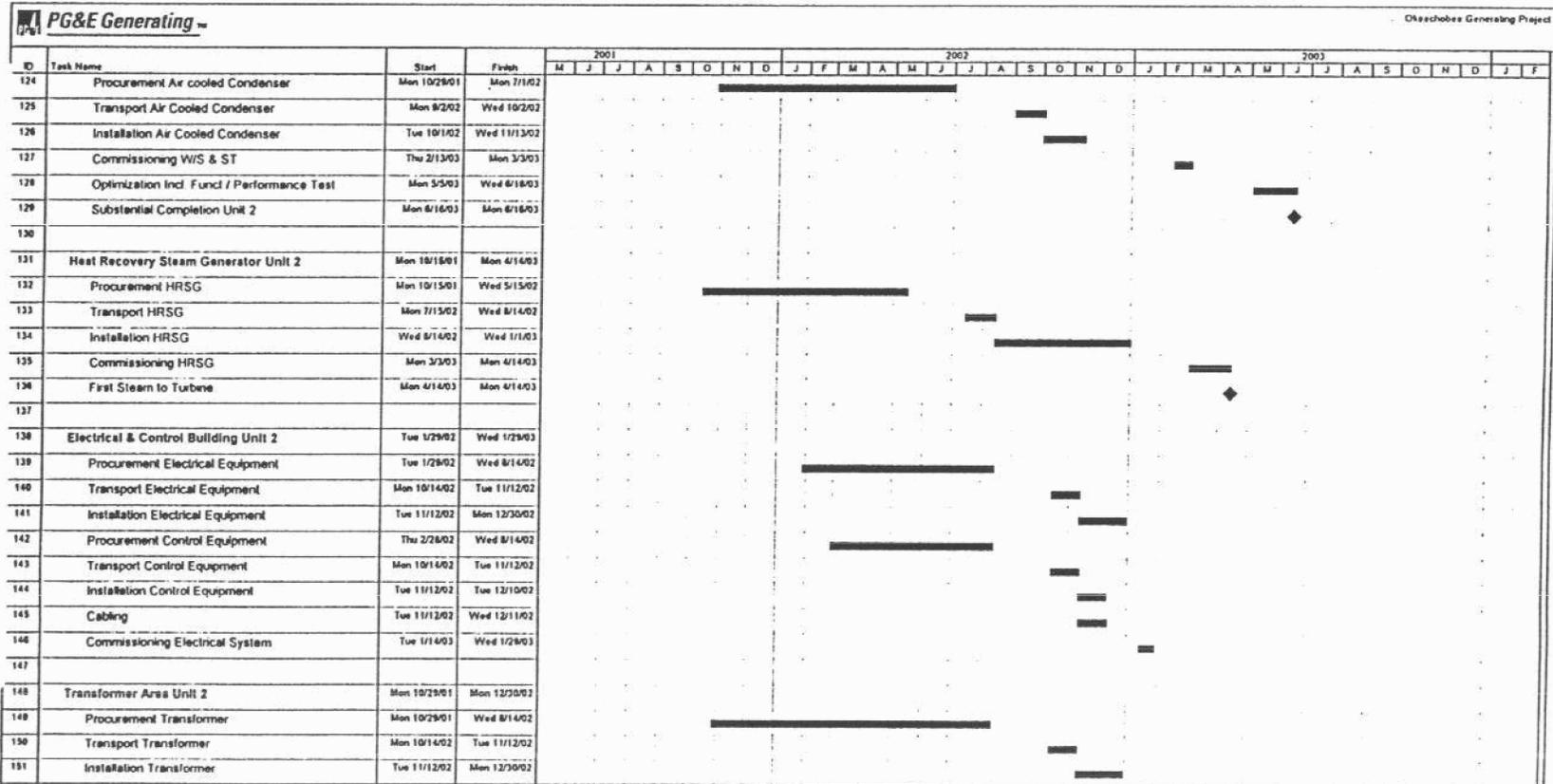
Tech S Corp
P.O. BOX 393 WESTBOROUGH, MA 01581
(508) 393-7085



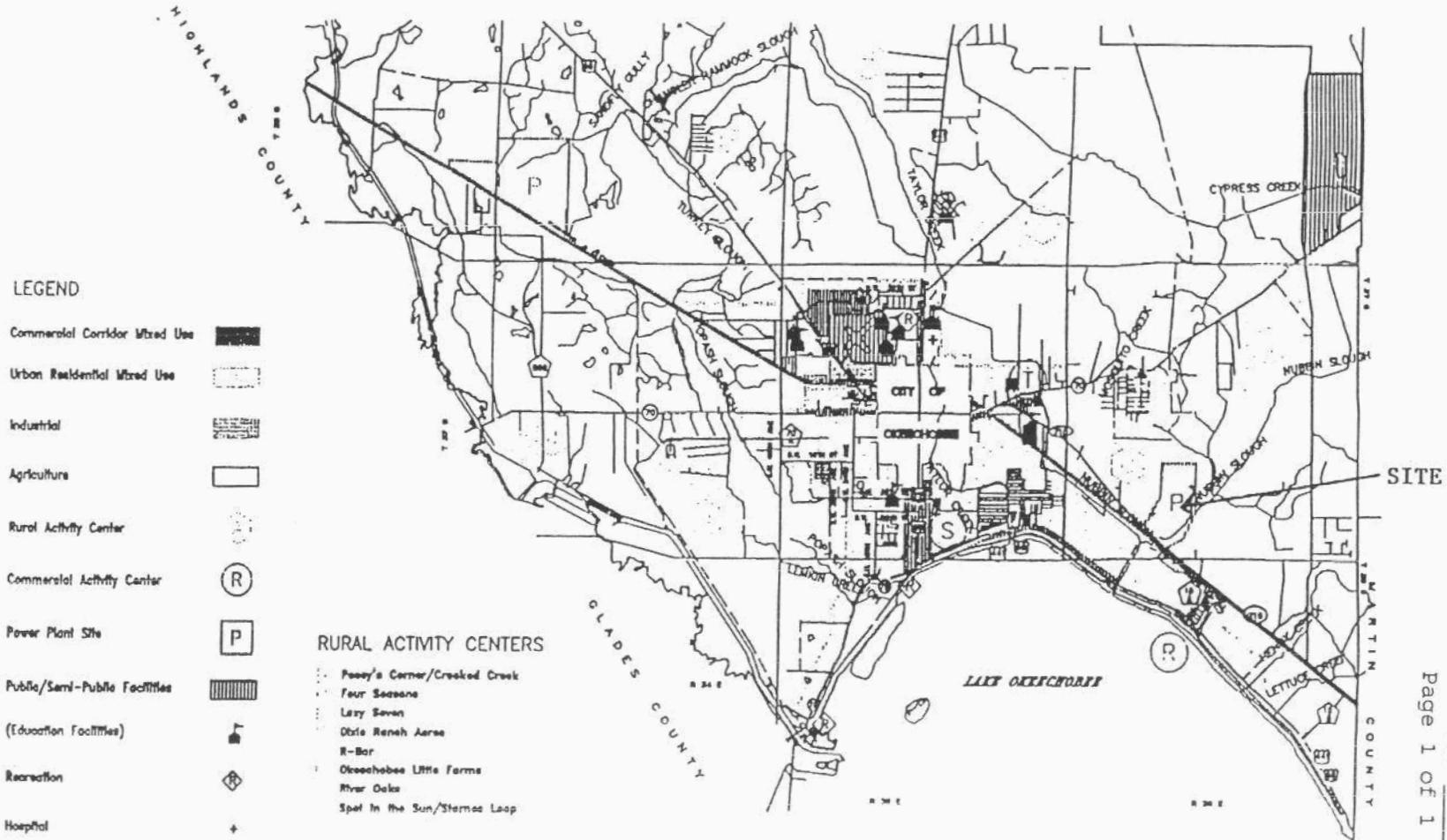
ELECTRIC POWER ENGINEERING
35 MAIN STREET (508) 435-0200 HOPKINTON, MA 01748

DESIGN	RAJ	PG&E GENERATING COMPANY BETHESDA, MARYLAND NEW GENERATION PLANT FIGURE 6 OKEECHOBEE GENERATING PROJECT ONE-LINE ELECTRICAL DIAGRAM
CHKD		
APPD		
DATE	9/17/99	
SCALE	NONE	
NO.	9229-9-E01-0	

FIGURE 13
(continued)



**FIGURE 3
OKEECHOBEE GENERATING PROJECT SITE LOCATION RELATIVE TO LOCAL
LANDMARKS AND ZONING DESIGNATIONS**



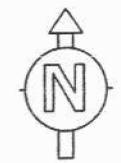
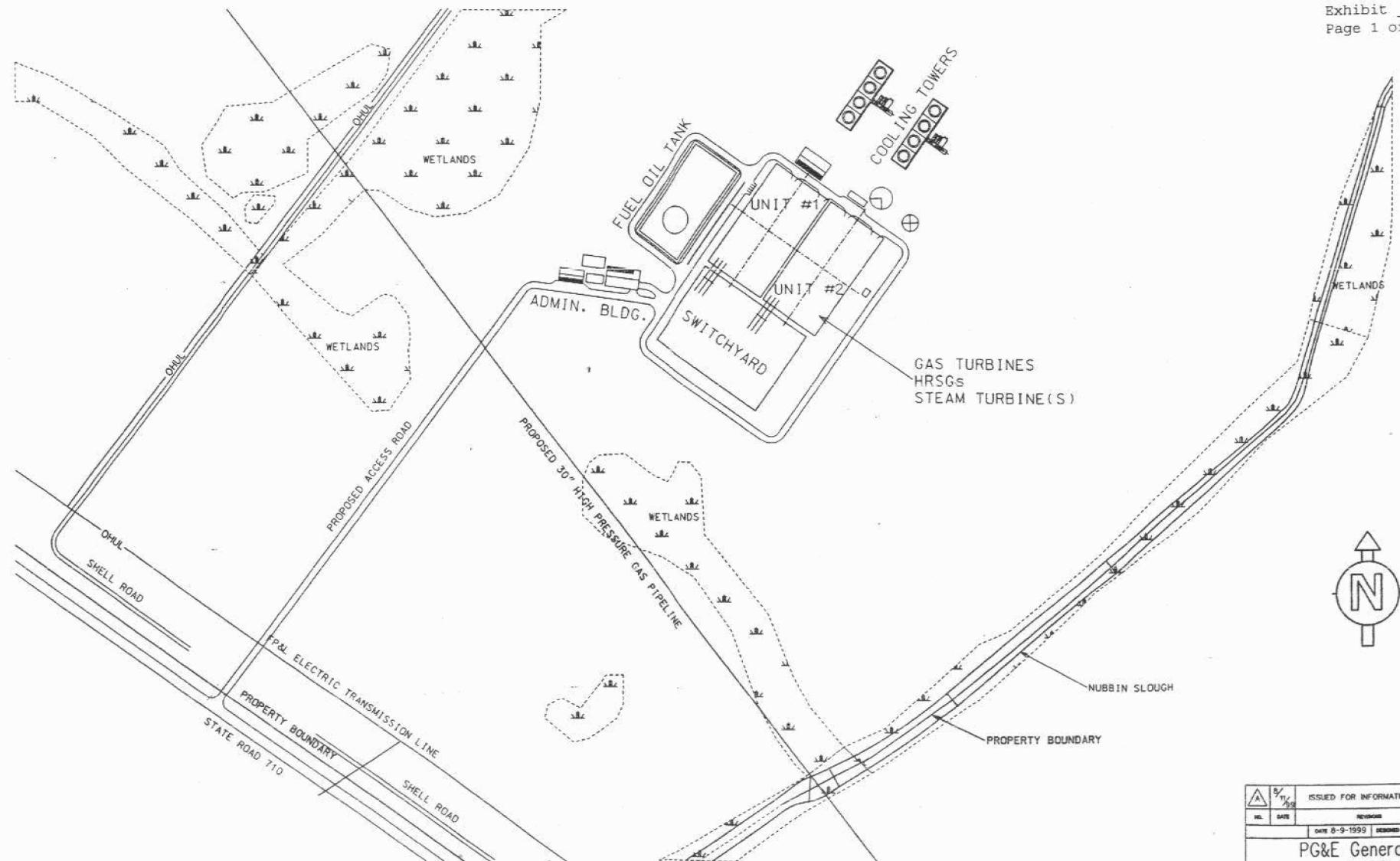
FPSC Docket No. 991462-EU
OGC
Witness: Sullivan
Exhibit _____ (WFS-10)
Page 1 of 1

This Conceptual Future Land Use map is a graphic representation of the Okeechobee County Comprehensive Plan Future Land Use Element, and is not intended to be interpreted without the Goal, objective, and policies contained within the element.

- RURAL ACTIVITY CENTERS**
- Peay's Corner/Crested Creek
 - Four Seasons
 - Lazy Seven
 - Obis Ranch Area
 - R-Bar
 - Okeechobee Little Farms
 - River Oaks
 - Spot In the Sun/Starnes Loop
- COMMERCIAL ACTIVITY CENTERS**
- R C.R. 18-A
 - S WOLFF ROAD
 - T S.R. 70 / 710

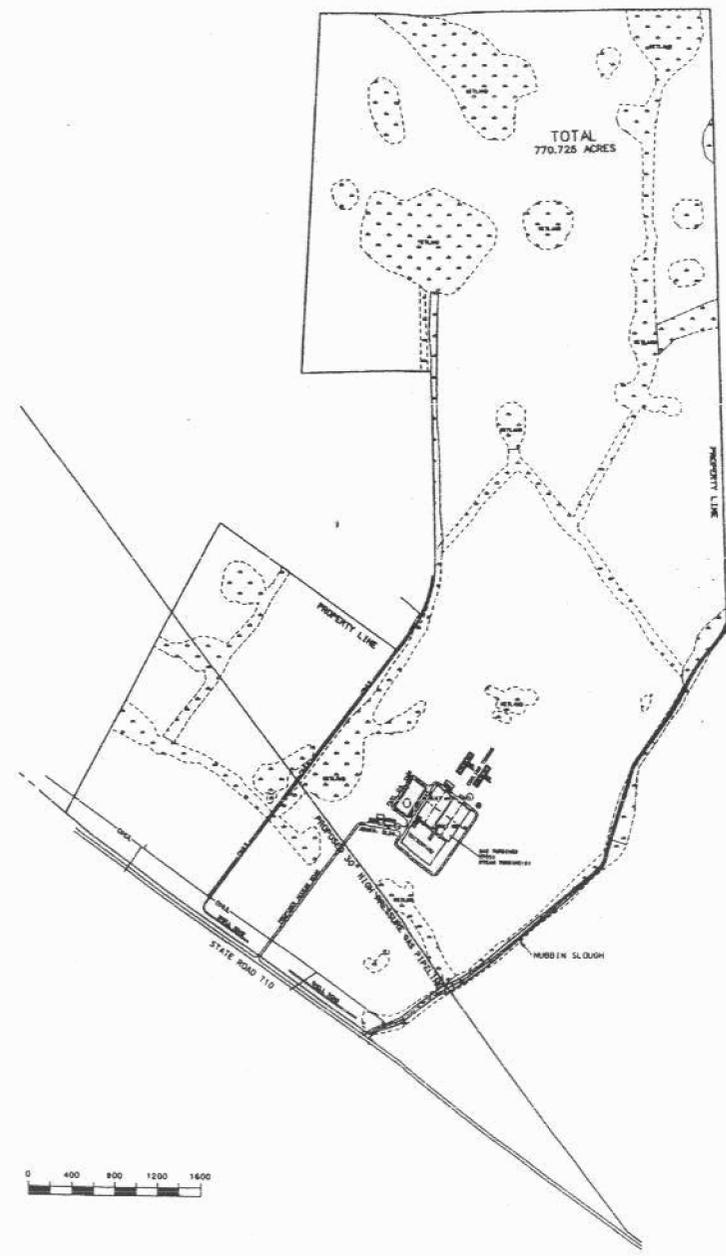


Adopted April 3, 1983
Amended July 26, 1988
Amended December 18, 1987
Drawing File 1118390.0199
Prepared by Okeechobee County Planning Department
Reviewed by Ralph O. Davis II Local Plan 1/88
DCPD



ISSUED FOR INFORMATION		BY	CHK	DES. SUPV.	CHK.	PROJ. ENG.	APPV.
DATE	REVISION	DATE 8-9-1999	REVISION	DRWING	MAD	CHK	DATE
PG&E Generating Company BETHESDA, MARYLAND							
OKEECHOBEE GENERATING PROJECT OKEECHOBEE COUNTY, FL							
FIGURE 4 SITE PLAN							
DRAWING NO.		REV.					
PG&E Gen		FL-SITE		A			

FPSC Docket No. 991462-EU
 OGC
 Witness: Sullivan
 Exhibit _____ (WFS-3)
 Page 1 of 1



A	8/10/99	ISSUED FOR INFORMATION							
NO.	DATE	REVISION	BY	CHK	APP.	DATE	BY	CHK	APP.
		DATE 8/10/1999	DESIGNED	DRAWN	MAB	CHKD			
PG&E Generating Company BETHESDA, MARYLAND									
OKEECHOBEE GENERATING PROJECT OKEECHOBEE COUNTY, FL									
FIGURE 5 PLOT PLAN									
PG&E Gen			DRAWING NO.			REV.			
			FL-PLOT			A			