

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

FREDERICK M. SELLARS

ON BEHALF OF

OKEECHOBEE GENERATING COMPANY, L.L.C.

DOCUMENT NUMBER-DATE

13115 OCT 25 8

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 FREDERICK M. SELLARS

1 Q: Please state your name and business address.

2 A: Frederick M. Sellars, 196 Baker Avenue, Concord,
3 Massachusetts, 01742.

4

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

6 A: I am Vice President of Environmental Sciences and Planning at
7 Earth Tech, Incorporated.

8

9 Q: Please describe your general duties for the Okeechobee
10 Generating Project.

11 A: Earth Tech is the lead environmental consultant for the
12 Okeechobee Generating Project ("Project"), and I am Earth
13 Tech's Manager for this matter.

14

15 QUALIFICATIONS AND EXPERIENCE

16 Q: Please summarize your educational background and experience.

17 A: I have over 20 years of environmental consulting experience,
18 specializing in the siting and licensing of energy
19 facilities. I hold a B.S. in Natural Resources from Cornell
20 University. A copy of my resume' is attached hereto as
21 Exhibit ____ (FMS-1).

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1 Q: What is your experience in power plant siting and licensing?

2 A: I have managed and directed the multi-disciplinary permitting
3 of 20 proposed power plant projects, totaling over 7,500
4 megawatts.

5

6 Q: How many of these were actually permitted and either
7 constructed or are under construction?

8 A: Nine of these projects, totaling over 2,500 MW, are either
9 operating or under construction. An additional three of
10 these projects, totaling over 2,600 MW are expected to begin
11 construction before the end of this year.

12

13 Q: With respect to the 20 power plant projects that you have
14 managed and directed, has any project not been completed due
15 to environmental permitting problems?

16 A: No.

17

18 Q: Have you previously testified before regulatory authorities
19 or courts?

20 A: Yes. I have testified several times before the Massachusetts
21 Energy Facilities Siting Board, the Connecticut Siting
22 Council, the Rhode Island Energy Facility Siting Board, the

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1 New York State Department of Environmental Conservation, and
2 the Massachusetts Department of Environmental Protection.

3

4 Q: What are your specific responsibilities with respect to the
5 Okeechobee Generating Project that is the subject of this
6 proceeding?

7 A: I have responsibility for directing and overseeing the
8 environmental impact analyses supporting the Okeechobee
9 Generating Project.

10

11 Q: Are you sponsoring any exhibits to your testimony?

12 A. Yes.

13 Exhibit No. FMS-1. Resume' of Frederick M. Sellars.

14 Exhibit No. FMS-2. I am also sponsoring the Project
15 Licensing Schedule.

16 I am also sponsoring Figures 3 and 14, and the Total
17 Site Area section of Table 1 contained in the Exhibits filed
18 with the Petition for Determination of Need for the
19 Okeechobee Generating Project and the associated narrative
20 text at pages 2-4, 9, 15, 17, 21, 36, 41, and 71-72 of those
21 Exhibits.

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ENVIRONMENTAL PROFILE

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

A: The Okeechobee Generating Project will be a state-of-the-art combined cycle power plant. It will employ advanced emission control equipment, including the use of Selective Catalytic Reduction (SCR) to control emissions of nitrogen oxides (NO_x). As such, it will be among the cleanest and most fuel-efficient fossil fueled power production facilities in the country. Through displacement of generation from older, less efficient, and higher-polluting units, operation of the Okeechobee Generating Project will result in a net environmental benefit, in terms of regional air emissions. The Project is proposed to be located on an approximately 771 acre site in a rural area about five miles southeast of the City of Okeechobee. The large size of the site will provide substantial buffering potential for the Project. The Project will not be close to any residential areas and will be located on the site in a manner that to minimizes impacts on the surrounding area. The site is zoned for the intended use and is located immediately proximate to existing electric transmission lines, a proposed major interstate natural gas pipeline as well as reliable sources of process water. The

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1 Project footprint has been carefully sited to minimize
2 impacts and encroachment on wetland areas.

3

4 OKEECHOBEE GENERATING PROJECT - SITE EVALUATION

5 Q: Have you reviewed the proposed site for the Okeechobee
6 Generating Project?

7 A: Yes, Earth Tech has reviewed and analyzed the proposed site.

8

9 Q: Please describe the steps that your review encompassed.

10 A: The review included site reconnaissance, land use and zoning
11 compatibility assessment, ecological resources investigation,
12 wetlands delineation, preliminary air quality impact
13 evaluation, infrastructure assessment, and water supply
14 investigation.

15

16 Q: What did you do to gather information for your analysis?

17 A: Our analyses were based on review of available secondary
18 mapping and data sources, including United States Geological
19 Survey (USGS) topographic maps, United States Fish & Wildlife
20 Service wetlands mapping, geographic information system (GIS)
21 data, aerial photographs, zoning and master planning
22 documentation, Code of Federal Regulations information on air
23 quality standards attainment status, USGS and South Florida

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1 Water Management District hydrological information, United
2 States Department of Agriculture Natural Resources
3 Conservation Service soils mapping, contact with the Florida
4 Fish and Wildlife Conservation Commission, and site
5 reconnaissance surveys.

6

7 Q: Please summarize the results of your analysis.

8 A: The proposed site has more than sufficient acreage to support
9 the plant layout and provide an adequate buffer. It is
10 traversed by a 230 kV transmission line, allowing on-site
11 interconnection with the transmission grid. The site is
12 easily accessible from the existing highway system and nearby
13 rail service offers an opportunity to transport large
14 equipment items by rail. The proposed new Gulfstream Natural
15 Gas System pipeline will traverse the site, facilitating
16 interconnection with the natural gas system. The site is
17 largely vacant and is not located adjacent to any residential
18 areas or other sensitive land uses. The site has been zoned
19 to accommodate power plant development, and the proposed
20 Project is consistent with the development objectives set
21 forth in the Okeechobee County Comprehensive Plan. Adequate
22 upland area exists on the site to enable Okeechobee
23 Generating Company to design, locate and construct the

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1 facility in a manner that will minimize impacts to wetland
2 areas.

3 The site is proximate to Taylor Creek/Nubbin Slough, and
4 preliminary analyses indicate that sufficient water supply
5 exists to reliably support the Project's needs. The primary
6 source of makeup water will be surface water from South
7 Florida Water Management District Canal C-59 at the Taylor
8 Creek/Nubbin Slough. Onsite groundwater wells will provide
9 backup water supply when necessary.

10 The Project will incorporate state-of-the-art emissions
11 control technology and, as such, will be among the cleanest
12 fossil fueled power plants in the country. In addition, due
13 to its high efficiency (6,775 BTU per kWh (HHV)), it is
14 expected to economically displace older, less efficient and
15 higher emitting units. This should result in substantial
16 reductions in regional emissions from power generation which,
17 in turn, would result in a significant net air quality
18 benefit. The lack of significant terrain features or nearby
19 potentially interacting emission sources will help to
20 minimize local air quality impacts.

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1 Q: What are the major findings of your analysis?

2 A: The major finding of the above analysis is that the proposed
3 site is an ideal location for development of a power plant.
4 It is adjacent to existing electric transmission
5 infrastructure and a proposed new natural gas transmission
6 line and is easily accessed from the existing state highway
7 system. The site has been zoned to accommodate power plant
8 development. An adequate source of process surface water is
9 located nearby, which, combined with on-site groundwater,
10 will provide a reliable water supply. The site's size and
11 surrounding land use provide a substantial buffer from any
12 residential or other sensitive land uses. The site is
13 located in an area designated as attainment with respect to
14 the National Ambient Air Quality Standards with the potential
15 for excellent dispersion from an air emissions standpoint.

16

17 Q: Do you still agree with the findings and conclusions of your
18 analysis?

19 A: Yes.

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1 Q: What is the licensing schedule for the Okeechobee Generating
2 Project?

3 A: Okeechobee Generating Company plans to file the site
4 certification application in time to allow for commencement
5 of commercial operations by April of 2003. The Project
6 licensing schedule is attached as Exhibit _____ (FMS-2).

7
8 Q: Do you have a conclusion with respect to the ability of the
9 Okeechobee Generating Project to obtain all necessary
10 licenses within the time frames described in the licensing
11 schedule?

12 A: Yes.

13

14 Q: What is your conclusion?

15 A: Based on our review and analysis, it is my professional
16 opinion that the Okeechobee Generating Project should be
17 successfully permitted in a timely fashion and in accordance
18 with all applicable environmental laws and regulations.

19

20 Q: Are you aware of any reason that the Okeechobee Generating
21 Project could not be successfully permitted and licensed?

22 A: No.

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1 Q: Does this conclude your direct testimony?

2 A: Yes.

FREDERICK M. SELLARS

VICE PRESIDENT
ENVIRONMENTAL SCIENCES AND PLANNING

EDUCATION

B.S., Natural Resources, Cornell University, 1977

PROFESSIONAL SUMMARY

Mr. Sellars is Vice President of Earth Tech's Environmental Sciences and Planning Group. He has over 20 years of environmental consulting experience specializing in the siting and comprehensive environmental licensing of energy and industrial facilities nationwide. Mr. Sellars' experience includes extensive involvement with environmental regulations and permitting strategies, modeling calculations, technical studies, preparation of environmental impact statements, and expert witness testimony.

PROFESSIONAL EXPERIENCE

Electric Utility/Cogeneration Facility Licensing

- **New England Power and Narragansett Electric Company, Providence, Rhode Island – Manchester Street Station.** Project manager for environmental licensing of the 450 MW Manchester Street Station Repowering Project and associated underground transmission facilities in Providence, Rhode Island. Key activities included preparation of an environmental assessment to support Energy Facilities Siting Board and Coastal Resources Management Council license applications, air quality permitting, wetlands permitting and an 18-month estuarine quality and ecological sampling effort to support RIPDES permitting including Section 316(a) and (b) demonstrations.
- **New York State Electric and Gas, Lansing, New York – Milliken Station CCT Demonstration Project.** Project manager for environmental licensing support for the Milliken Station Clean Coal Technology Program (CCT-IV) Demonstration Project. Project entailed installation of innovative flue gas desulfurization equipment and associated power plant modifications at NYSEG's 317 MW coal-fired power plant. Responsible for DOE-NEPA submittals and comprehensive environmental licensing.
- **Sithe New England, Mystic Station Redevelopment Project – Everett, Massachusetts.** Project Manager for the comprehensive environmental licensing of a proposed new 1,500 MW combined-cycle power plant at the existing Mystic Station.
- **U.S. Generating Company, Millennium Power, Charlton, Massachusetts – Generating Facility.** Project manager for the comprehensive environmental licensing of a 360 MW natural gas-fired generating facility. Responsible for preparation of an environmental impact report, Energy Facilities Siting Board Petition and air, wastewater and wetlands permit application.
- **Sithe Energies, Inc., Heritage Station, Oswego, New York.** Officer-in-charge for Article X and comprehensive environmental licensing of a proposed 800 MW natural gas-fired combined-cycle power plant adjacent to the existing Independence Station, near Oswego, New York.

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- **Glenville Energy Park, LLC, Glenville Energy Park, Glenville, New York.** Project Manager for Article X and comprehensive environmental licensing of a proposed 550 MW natural gas-fired combined-cycle power plant at the Glenville-Scotia Industrial Park in Glenville, New York.
- **Power Development Company – Berkshire Power, Agawam, Massachusetts.** Project manager for the siting and comprehensive environmental licensing of a 272 MW natural gas-fired generating facility. Key activities include implementation of an innovative site selection process, preparation of an environmental impact report (EIR), Energy Facilities Siting Board Petition and air, wastewater, and wetlands permit applications.
- **Sithe New England, Medway Station Expansion Project – Medway, Massachusetts.** Officer-in-Charge for the comprehensive environmental licensing of a proposed 540 MW simple cycle peaking project at the existing West Medway Station.
- **Enron Power, Milford, Massachusetts – Generating Facility.** Project manager for the comprehensive environmental licensing of a 146 MW natural gas-fired generating facility. Key activities included preparation of an environmental impact report (EIR) and air permit application. Major issues include impact of use of wastewater treatment plant effluent as cooling tower make-up, impacts to riverine ecology, noise impacts, wetlands crossings, and aesthetics.
- **American National Power, Bellingham, Massachusetts – Generating Facility.** Officer-in-charge for the siting and comprehensive environmental licensing of a 580 MW natural gas-fired generating facility in Bellingham, Massachusetts.
- **American National Power, Blackstone, Massachusetts – Generating Facility.** Officer-in-charge for the siting and comprehensive licensing of a 580 MW natural gas-fired generating facility in Blackstone, Massachusetts.
- **PDC El Paso – Milford, Connecticut.** Officer-in-Charge for siting and comprehensive environmental licensing of a 540 MW natural gas-fired generating facility in Milford, Connecticut.
- **PDC El Paso – Meriden, Connecticut.** Officer-in-Charge for siting and comprehensive environmental licensing of a 540 MW natural gas-fired generating facility in Meriden, Connecticut.
- **U.S. Generating Company, Wallkill, New York – Generating Facility.** Principal-in-charge for the comprehensive environmental licensing of a 150 MW combined-cycle combustion turbine generating facility. Key activities include preparation of an environmental impact statement and water quality and air permit applications.
- **Independent Power Producers, Confidential – Environmental Due Diligence.** Directed numerous environmental due diligence analyses for potential power plant project acquisitions in New York, New Jersey, Pennsylvania, West Virginia, Maryland, Maine, Massachusetts, Rhode Island, and Florida.

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- **American National Power, Massachusetts.** Due diligence for a power plant acquisition in Massachusetts.
- **PDC El Paso – Summit Power, Westfield, Massachusetts - Generating Facility.** Officer-in-charge for the comprehensive environmental licensing of a 272 MW natural gas-fired generating facility in Westfield, Massachusetts.
- **L'Energia Inc., Lowell, Massachusetts – Cogeneration Facility.** Principal-in-charge for environmental permitting of a natural gas-fired cogeneration facility. Major issues included air quality, noise, and water consumption.
- **Energy Resources and Logistics, Thorofare, New Jersey – Cogeneration Facility.** Directed critical flaw assessment and licensing strategy development for a proposed coal-fired cogeneration facility.
- **Holyoke Gas and Electric, Holyoke, Massachusetts – Critical Flaw Analysis.** Project manager for environmental permitting critical flaw analysis for the addition of new capacity of HG&E's Cabot Street Station.
- **Riverside Steam and Electric Company, Holyoke, Massachusetts – Cogeneration Facility.** Managed environmental impact report (EIR) and Prevention of Significant Deterioration (PSD) permit application for a coal-fired, fluidized bed cogeneration facility. Major issues included air quality, ash disposal, discharge of cooling water to the Connecticut River, noise and protection of endangered/special concern species, including the shortnosed sturgeon. Represented client at meetings with regulatory agencies and public hearings.

Resource Recovery Facility Licensing

- **Wheelabrator Environmental Systems, Inc., Peekskill, New York – Waste-to-Energy Facility.** Officer-in-charge for the comprehensive licensing of retrofits to the Charles Point Resource Recovery Facility in Westchester County, New York.
- **Wheelabrator Environmental Systems, Inc., Alabama, New York – Waste-to-Energy Facility.** Project manager for final site selection, air quality impact analysis, and state environmental quality review (SEQR) licensing of a proposed 1,500 ton per day regional waste-to-energy facility.
- **Ogden Martin Systems, Montgomery County, Maryland – Resource Recovery Facility.** Project manager for environmental permitting of an 1,800-tons per day (tpd) resource recovery facility and associated transfer station. Regional permits include solid waste management, wetlands, water appropriation, NPDES, and cultural resources and endangered species reviews.
- **Ogden Martin Systems, Lancaster County, Pennsylvania – NO_x RACT Plan.** Project manager for development of a NO_x Reasonably Available Control Technology (RACT) plan for a 1,200-tpd resource recovery facility.

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- **Warren Energy Resource Company, New Jersey – NO_x RACT Plan.** Project manager for development of a NO_x RACT plan for a 400-tpd resource recovery facility.
- **American Ref-Fuel, Green Island, New York – Integrated Solid Waste Management Facility.** Project manager for a comprehensive environmental assessment of a 1,500-tpd resource recovery facility and 300 tpd materials recycling facility.
- **Cogentrix, Inc., Portsmouth, Virginia – Waste-fired Power Plant.** Project manager for environmental permitting of an 1150 tpd municipal waste-fired power plant.
- **Old State Management Corporation, Lancaster, Massachusetts – Resource Recovery Facility.** Project manager for EIR and environmental permitting for the North County Resource Recovery Facility. Project would combust 800 tpd of municipal solid waste and recycle 150 tpd of aluminum, ferrous materials, cardboard and plastics, and compost yard wastes.
- **Catalyst Waste-to-Energy Corporation, Massachusetts – Resource Recovery Facility.** Site evaluation and feasibility assessment for a proposed resource recovery facility in southeastern Massachusetts.
- **American Ref-Fuel, Pennsylvania – Co-disposal Facility.** Provided technical support in several areas for preparing permit application for the Lehigh Valley Waste-to-Energy Co-disposal Facility. The facility was proposed to accept 1,000 tpd of municipal solid waste and 260 tpd of sewage sludge cake.
- **Power Recovery Systems, Quincy, Massachusetts – Resource Recovery Facility.** Managed EIR for a 400 tpd waste-to-energy facility. Major issues included air quality, ash disposal, wetlands, protection of endangered species, proximity of the proposed facility to the Blue Hills Reservation, and noise. Represented client at meetings with various regulatory agencies.
- **BioMedical Waste Systems, Chelsea, Massachusetts – Processing Facility.** Principal-in-charge for comprehensive licensing of prototypical biomedical waste processing facility in Massachusetts. Key permit requirements included site assignment waiver, solid waste management facility permit and Department of Health approval.
- **BioSafe, Inc., Concord, New Hampshire – Biomedical Waste Incinerator.** Directed critical flaw assessment and permit strategy development for proposed Biomedical waste incinerator.

Natural Gas Pipeline System Licensing

- **Walkill Transport Company, Walkill, New York – FERC Certification and Licensing.** Directed comprehensive environmental licensing of a 26-mile interstate natural gas pipeline from Sussex, New Jersey to Walkill, New York.
- **Consolidated Natural Gas Transmission Company, Oswego County, New York – FERC Certification.** Technical coordination of FERC Open Season Application for a pipeline from Oswego County, New York through Jefferson County to the Canadian border.

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- **Algonquin Gas Transmission Company – FERC Certification.** Responsible for senior technical review of several FERC Certification applications for various pipeline segments throughout the Northeast.

Wastewater Treatment Plant/Residuals Management Facility Licensing

- **Massachusetts Water Resources Authority, Boston, Massachusetts – Residuals Management Facilities Plan.** Site assessment team leader for Residuals Management Facilities Plan, a key component of the Boston Harbor cleanup effort. Developed site screening methodology and criteria for quantitative screening of 300 sites in eastern Massachusetts for selection of locations for coastal transfer facility sludge composting facility, incinerator, and secured landfill. Coordinated environmental assessment of finalist sites and developed option evaluation criteria.
- **Washington Suburban Sanitation Commission, Washington, D.C. – Siting Methodology Development.** Responsible for development of residuals management facility siting methodology. Study was to identify alternative locations in the metropolitan Washington, D.C. area for use in disposing of wastewater treatment plant residuals.

Petroleum Refinery Facility Licensing

- **Mellen Associates, Paulsboro, New Jersey – MTBE Refinery.** Directed critical flaw assessment and licensing strategy development for a proposed methyl-tertiary butyl ether facility near Paulsboro, New Jersey.
- **Confidential Client – Sour Gas Refinery.** Directed site selection and critical flaw analysis for a proposed Sour Gas Refinery in Michigan.

Air Quality Studies

- **Domino Sugar Corporation, Brooklyn, New York – NO_x RACT Plan for Sugar Refinery.** Prepared NO_x RACT plan for Domino Sugar's Brooklyn, New York refinery.
- **Tennessee Valley Authority.** Project manager for independent external peer review of the 1985 National Acid Precipitation Assessment Program emissions inventory compilation efforts. Review focused on the adequacy of the emissions data to support applications for the regional acid deposition model.
- **U.S. Environmental Protection Agency – Dioxin Study.** Modeled air transport of dioxin from contaminated network of unpaved roadways in Missouri as part of a health risk assessment. Developed modeling protocol for examination of dioxin-contaminated horse arena.
- **National Commission on Air Quality – Air Quality Modeling.** Conducted regional scale air quality modeling analyses covering the New York, New Jersey, and Connecticut area for SO₂ TSP, and NO_x. Evaluated several fuel switching and energy conservation scenarios. Conducted a critical review of the emissions/air quality portions for the state implementation plans submitted for this area.

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- **U.S. Department of Energy.** Contributing author of the Acid Rain Information Book-Second Edition. Wrote chapter on monitoring programs and results.
- **U.S. Environmental Protection Agency – Emission Inventory.** Directed several emissions inventory compilations to support regional scale Eulerian modeling. Directed the Northeast Corridor Regional Modeling Project Emissions Inventory and the 1980 National Acid Precipitation Assessment Program Eulerian Modeling Emissions Inventory efforts.
- **U.S. Environmental Protection Agency – Stack Height Regulations.** Managed program for the Control Programs Development Division to identify and evaluate sources affected by revisions to EPA's stack height regulations.
- **U.S. Environmental Protection Agency – TSP Inventory.** Conducted microinventories of total suspended particulates to determine causes of non-attainment in the Steubenville, Ohio - Wheeling, West Virginia area.
- **U.S. Environmental Protection Agency – Dispersion Modeling.** Conducted dispersion modeling analysis of air quality impacts of incineration of toxic waste in New Jersey.

Commercial Development Project Licensing

- **U.S. Postal Service, White River Junction, New Hampshire – Facility Expansion.** Managed NEPA Environmental Assessment for expansion of the White River Junction General Mail Facility. Project entailed adding 45,000 square feet of floor area and 93,500 square feet of parking and maneuvering area. Key issues included traffic, noise and local zoning.
- **Shoppers World, Framingham, Massachusetts – Air Quality Analyses.** Managed mobile source air quality modeling analyses surrounding transportation system improvements associated with expansion of the mall.
- **Phillips Academy, Massachusetts – Air Quality Analysis.** Directed air quality analyses resulting in favorable ruling pertaining to energy credits application. Key issues included combined impacts of nearby facilities and interstate transport.
- **Ocean Spray Cranberries, Massachusetts – Air Quality Analysis.** Managed air quality analysis and prepared supporting documentation for permits to construct and operate an additional boiler. Represented client at meetings with regulatory agencies.
- **Swansea Square, Swansea, Massachusetts – Wetlands Evaluation.** Managed a wetlands and hydrology evaluation and mitigation strategy development project for a proposed shopping mall in southeastern Massachusetts. A key issue was the creation of a compensatory wetlands replication area.

PROFESSIONAL AFFILIATIONS

Air and Waste Management Association
Northeast Energy and Commerce Association, Vice President

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PREVIOUS EMPLOYERS

ENSR Consulting and Engineering, March 1986 to June 1993
GCA/Technology Division, May 1978 to March 1986

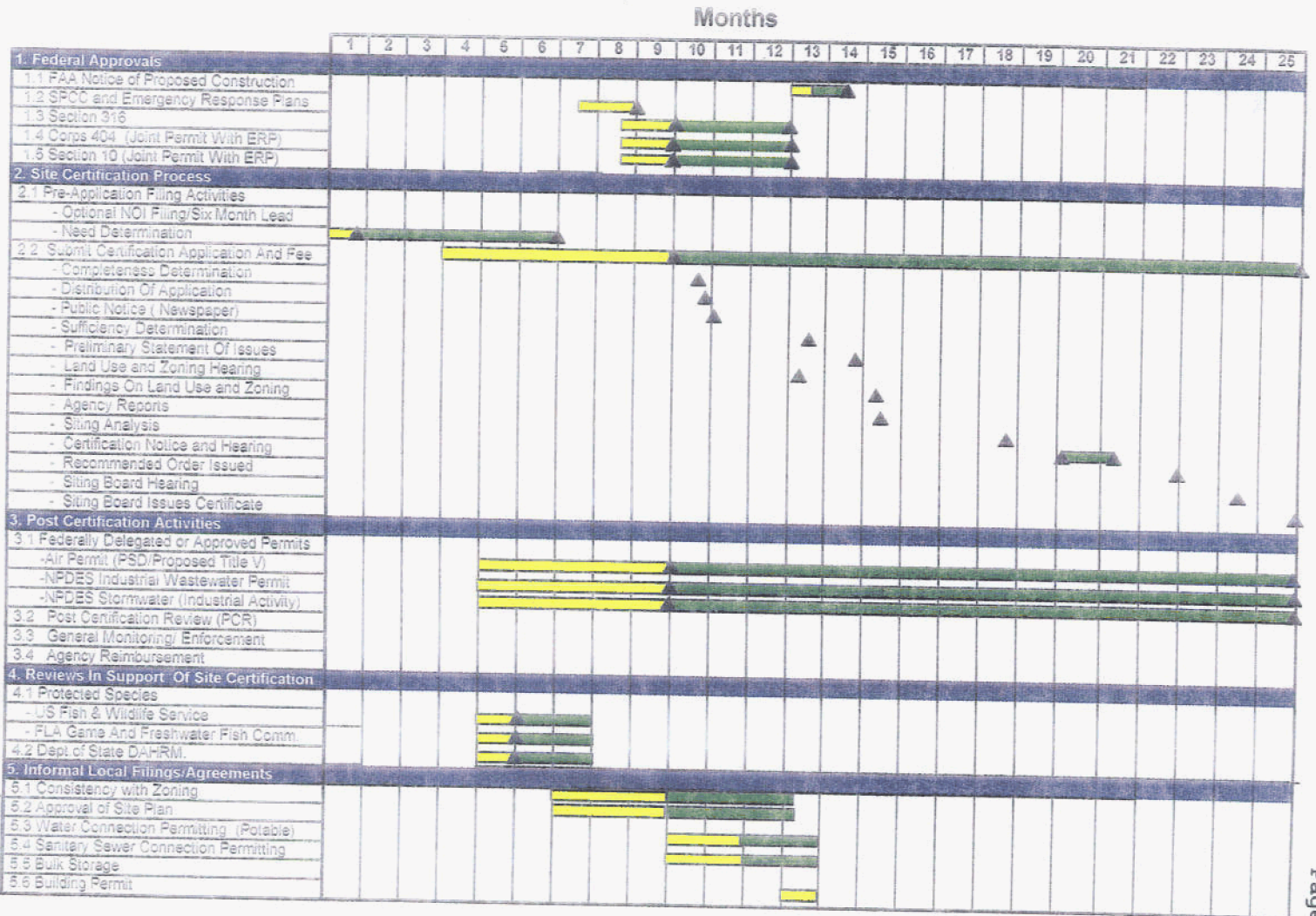
OFFICE LOCATION

Concord, Massachusetts

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Figure 14
 Environmental Licensing Schedule
 Merchant Generating Facility, Okeechobee, Florida

Assumptions: 1 - No adjustments to project concept after Month 5; 2 - No major amendments to Site Certification Application; 3 - Immediate Completeness Determination; 4 - Site in Compliance With Local Zoning



LEGEND
 Earth Tech
 Okeechobee Activity
 Agency Review
 Submittal Hearing Milestone

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