

# COMPLIANCE PLAN

## CONDITIONS OF CERTIFICATION

### COMPLIANCE PROJECT MANAGER (CPM) RESPONSIBILITIES

A CPM will oversee the compliance monitoring and shall be responsible for:

1. Ensuring that the design, construction, operation, and closure of the project facilities is in compliance with the terms and conditions of the Commission Decision;
2. Resolving complaints;
3. Processing post-certification changes to the conditions of certification, project description, and ownership or operational control;
4. Documenting and tracking compliance filings; and,
5. Ensuring that the compliance files are maintained and accessible.

The CPM is the contact person for the Commission and will consult with appropriate responsible agencies and the Commission when handling disputes, complaints and amendments.

All project compliance submittals are submitted to the CPM for processing. Where a submittal required by a condition of certification requires CPM approval, it should be understood that the approval would involve all appropriate staff and management.

The Commission has established a toll free 800 number for the public to use for notifying the Commission about power plant construction and operation related complaints or events of concern. The telephone number is **1-800-858-0784**.

### ***Pre-Construction and Pre-Operation Compliance Meeting***

The CPM may schedule pre-construction and pre-operation compliance meetings prior to the projected start-dates of construction, plant operation, or both. The purpose of these meetings will be to assemble both the Commission's and the project owner's technical staff to review the status of all pre-construction or pre-operation requirements contained in the Commission's Conditions of Certification to confirm that they have been met or, if they have not been met, to ensure that the proper action is taken. In addition, these meetings shall ensure, to the extent possible, that Commission conditions will not delay the construction and operation of the plant due to oversight or inadvertence and to preclude any last minute, unforeseen issues from arising.

## ***Commission Record***

The Commission shall maintain as a public record in either the Compliance file or Docket file for the life of the project (or other period as required):

- 1) All documents demonstrating compliance with any legal requirements relating to the construction and operation of the facility;
- 2) All monthly and annual compliance reports filed by the project owner;
- 3) All complaints of noncompliance filed with the Commission; and,
- 4) All petitions for project or condition changes and the resulting staff or Commission action taken.

## **PROJECT OWNER RESPONSIBILITIES**

It is the responsibility of the project owner and any successors in interest to ensure that the general compliance conditions and the Conditions of Certification are satisfied. The general compliance conditions regarding post-certification changes specify measures that the project owner and any successors in interest must take when requesting changes in the project design, compliance conditions, or ownership. Failure to comply with any of the Conditions of Certification or the general compliance conditions may result in revocation of Commission certification, an administrative fine, or other action as appropriate.

## **Access**

The CPM, designated staff, and delegated agencies or consultants, shall be guaranteed and granted access to the power plant site, related facilities, project-related staff, and the records maintained on site, for the purpose of conducting audits, surveys, inspections, or general site visits. Although the CPM will normally schedule site visits on dates and time agreeable to the project owner, the CPM reserves the right to make unannounced visits.

## ***Compliance Record***

The project owner shall maintain project files on-site or at an alternative site approved by the CPM, for the life of the project. The files shall contain copies of all “as-built” drawings, all documents submitted as verification for conditions, and all other project-related documents for the life of the project, unless a lesser period is specified by the Conditions of Certification.

Commission staff and delegate agencies shall, upon request to the project owner, be given access to the files.

## ***Start of Operations***

The TPP shall be on line not later than December 31, 2002. If the TPP is not operational by that date, the CEC shall conduct a hearing to determine whether due diligence was exercised by the project owner. If the CEC determines that due diligence was not exercised, the CEC shall set a specific date by which the project must be brought on line as a condition precedent to continue the certification.

## ***Three Year Review ( Project will request “project life” request, will this effect 3-year review)***

No later than 15 days after the completion of the first three years of operation, the project owner shall submit to the CEC a report of operations that contains a review of the project's compliance with the terms and conditions of certification, the number of hours of operation and the demand for power from the facility during the three year period.

## ***Compliance Verifications***

A cover letter from the project owner or authorized agent is required for all compliance submittals and correspondence pertaining to compliance matters. **The cover letter subject line shall identify the involved condition(s) of certification by condition number and include a brief description of the subject of the submittal.** The project owner shall also identify those submittals **not** required by a condition of certification with a statement such as: “This submittal is for information only and is not required by a specific condition of certification.” When submitting supplementary or corrected information, the project owner shall reference the date of the previous submittal.

The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed by the project owner or an agent of the project owner.

All submittals shall be addressed as follows:

**Compliance Project Manager  
Tracy Peaker Project (TPP)  
California Energy Commission  
1516 Ninth Street (MS-2000)  
Sacramento, CA 95814**

If the project owner desires Commission staff action by a specific date, it shall so state in its submittal and include a detailed explanation of the effects on the project if this date is not met.

Each Condition of Certification is followed by a means of verification. The verification describes the Commission's procedure(s) to ensure post-certification compliance with

adopted conditions. The verification procedures, unlike the conditions, may be modified, as necessary, by the CPM, in most cases without Commission approval. [See Title 20, California Code of Regulations, §1760.]

Verification of compliance with the Conditions of Certification can be accomplished by:

- 1) Reporting on the work done and providing the pertinent documentation in monthly and/or annual compliance reports filed by the project owner or authorized agent as required by the specific Conditions of Certification;
- 2) Appropriate letters from delegate agencies verifying compliance;
- 3) Commission staff audit of project records; and/or
- 4) Commission staff inspection of mitigation and/or other evidence of mitigation.

### ***Compliance Reporting***

There are two different compliance reports that the project owner must submit to assist the CPM in tracking activities and monitoring compliance with the terms and conditions of the Commission Decision. During construction, the project owner or authorized agent shall submit Monthly Compliance Reports. During operation, an Annual Compliance Report must be submitted. These reports, and the requirement for an accompanying compliance matrix, are described below. The majority of the Conditions of Certification require that compliance submittals be submitted to the CPM in the monthly compliance reports.

### ***Compliance Matrix***

A compliance matrix shall be submitted by the project owner to the CPM along with each monthly and annual compliance report. The compliance matrix is intended to provide the CPM with the current status of compliance conditions in a spreadsheet format. The compliance matrix must identify:

- 1) The technical area;
- 2) The condition number;
- 3) A brief description of the verification action or submittal required by the condition;
- 4) The date the submittal is required (e.g., sixty (60) days prior to construction, after final inspection, etc.);
- 5) The expected or actual submittal date;

- 6) The date a submittal or action was approved by the Chief Building Official (CBO), CPM, or delegate agency, if applicable; and
- 7) An indication of the compliance status for each condition (e.g., “not started”, “in progress” or “completed date”).

Completed or satisfied conditions do not need to be included in the compliance matrix after they have been identified as completed/satisfied in at least one monthly or annual compliance report.

### ***Monthly Compliance Report***

During construction of the project, the project owner or authorized agent shall submit Monthly Compliance Reports within 10 working days after the end of each reporting month. Monthly Compliance Reports shall be clearly identified for the month being reported. The reports shall contain, at a minimum:

- 1) A summary of the current project construction status, a revised/updated schedule if there are significant delays, and an explanation of any significant changes to the schedule;
- 2) Documents required by specific conditions to be submitted along with the Monthly Compliance Report. Each of these items must be identified in the transmittal letter, and should be submitted as attachments to the Monthly Compliance Report;
- 3) An initial, and thereafter updated, compliance matrix which shows the status of all Conditions of Certification (fully satisfied and/or closed conditions do not need to be included in the matrix after they have been reported as closed);
- 4) A list of conditions which have been satisfied during the reporting period, and a description or reference to the actions which satisfied the condition;
- 5) A list of any submittal deadlines that were missed accompanied by an explanation and an estimate of when the information will be provided;
- 6) A cumulative listing of any approved changes to Conditions of Certification;
- 7) A listing of any filings with, or permits issued by, other governmental agencies during the month;
- 8) A projection of project compliance activities scheduled during the next two months;
- 9) A listing of the month’s additions to the on-site compliance file; and

- 10) Any requests to dispose of items that are required to be maintained in the project owner's compliance file.

**The first Monthly Compliance Report is due the month following the Commission business meeting date that the project was approved, unless the project owner notifies the CPM in writing that a delay is warranted. The first Monthly Compliance Report shall include an initial list of dates for each of the events identified on the Key Events List. (The Key Events List is located at the end of this section.)**

### ***Annual Compliance Report***

After the air district has issued a Permit to Operate, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports. The Permit to Operate is issued following the satisfactory completion of the required source test.

The annual reports are for each calendar year of commercial operation and are due to the CPM each year on a date designated by the CPM. Annual Compliance Reports shall be submitted over the life of the project unless otherwise specified by the CPM. Each Annual Compliance Report shall identify the reporting period and shall contain the following:

- 1) An updated compliance matrix which shows the status of all Conditions of Certification (fully satisfied and/or closed conditions do not need to be included in the matrix after they have been reported as closed);
- 2) A summary of the current project operating status and an explanation of any significant changes to facility operations during the year (e.g., total hours of operation, scheduled and unscheduled maintenance and any major repairs);
- 3) Documents required by specific conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter, and should be submitted as attachments to the Annual Compliance Report;
- 4) A cumulative listing of all post-certification changes approved by the Commission or cleared by the CPM;
- 5) An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;
- 6) A listing of filings made to, or permits issued by, other governmental agencies during the year;
- 7) A projection of project compliance activities scheduled during the next year;
- 8) A listing of the year's additions to the on-site compliance file, and

- 9) An evaluation of the on-site contingency plan for unexpected facility closure, including any suggestions necessary for bringing the plan up to date [see General Conditions for Facility Closure addressed later in this section].

### ***Confidential Information***

Any information deemed confidential by the project owner shall be submitted to the Commission's Docket with an application for confidentiality pursuant to Title 20, California Code of Regulations, § 2505(a). Any information determined to be confidential shall be kept confidential as provided for in Title 20, California Code of Regulations, § 2501 et seq.

### ***Department of Fish and Game Filing Fee***

Pursuant to the provisions of Fish and Game Code, § 711.4, the project owner shall pay a filing fee in the amount of eight hundred and fifty dollars (\$850) to the Department of Fish and Game. The payment instrument shall be provided to the Commission's Project Manager at the time of project certification and shall be made payable to the California Department of Fish and Game. The Commission's Project Manager will submit the payment to the Office of Planning and Research as payment to the Secretary of the Resources Agency at the time of filing of the notice of decision pursuant to Public Resources Code, § 21080.5.

## **FACILITY CLOSURE**

### ***Introduction***

At some point in the future, the project will cease operation and close down. At that time, it will be necessary to ensure that the closure occurs in such a way that public health and safety and the environment are protected from adverse impacts. Although the project setting for this project does not appear, at this time, to present any special or unusual closure problems, it is impossible to foresee what the situation will be in 30 years or more when the project ceases operation. Therefore, provisions must be made which provide the flexibility to deal with the specific situation and project setting which will exist at the time of closure. Laws, ordinances, regulations and standards (LORS) pertaining to facility closure are identified in the sections dealing with each technical area. Facility closure will be consistent with LORS in effect at the time of closure.

There are at least three circumstances in which a facility closure can take place: planned closure, unexpected temporary closure and unexpected permanent closure.

### ***Planned Closure***

This planned closure occurs at the end of a project's life, when the facility is closed in an anticipated, orderly manner, at the end of its useful economic or mechanical life, or due to gradual obsolescence.

### ***Unexpected Temporary Closure***

This unplanned closure occurs when the facility is closed suddenly and/or unexpectedly, on a short-term basis, due to unforeseen circumstances such as a natural disaster or an emergency.

### ***Unexpected Permanent Closure***

This unplanned closure occurs if the project owner closes the facility suddenly and/or unexpectedly, on a permanent basis. This includes unexpected closure where the owner remains accountable for implementing the on-site contingency plan. It can also include unexpected closure where the project owner is unable to implement the contingency plan and the project is essentially abandoned.

## ***General Conditions for Facility Closure***

### **Planned Closure**

In order that a planned facility closure does not create adverse impacts, a closure process that provides for careful consideration of available options, applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of closure, will be undertaken. To ensure adequate review of a planned project closure, the project owner shall submit a proposed facility closure plan to the Commission for review and approval at least twelve months prior to commencement of closure activities (or other period of time agreed to by the CPM). The project owner shall file 120 copies (or other number of copies agreed upon by the CPM) of a proposed facility closure plan with the Commission.

The plan shall:

1. Identify and discuss any impacts and mitigation to address significant adverse impacts associated with proposed closure activities and to address facilities, equipment, or other project related remnants that will remain at the site.

2. Identify a schedule of activities for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project.
3. Identify all facilities and equipment that will a) be immediately removed from the site after closure (e.g., hazardous materials); b) temporarily remain on the site after closure (e.g., until the item is sold or scrapped); and c) permanently remain on the site after closure. The plan must explain both why the item cannot be removed and why it does not present a risk of harm to the environment and the public health and safety to remain *in situ* for an indefinite period.
4. Address conformance of the plan with all applicable laws, ordinances, regulations, standards, local/regional plans in existence at the time of facility closure, and applicable Conditions of Certification.

Workshops and/or hearings may be conducted as part of the Commission's approval procedure if there are significant issues associated with the proposed facility closure plan, or the desires of local officials or interested parties are inconsistent with the plan.

In addition, prior to submittal of the proposed facility closure plan, a meeting shall be held between the project owner and the Commission CPM for the purpose of discussing the specific contents of the plan.

As necessary, prior to or during the closure plan process, the project owner shall take appropriate steps to eliminate any immediate threats to public health and safety or the environment, but shall not commence any other closure activities, until Commission approval of the facility closure plan is obtained.

### ***Unexpected Temporary Closure***

In order to ensure that public health and safety and the environment are protected in the event of an unexpected temporary facility closure, it is essential to have an on-site contingency plan in place. The on-site contingency plan will help to ensure that all necessary steps to mitigate public health and safety, and environmental impacts, are taken in a timely manner.

The project owner shall submit an on-site contingency plan for CPM review and approval. The plan shall be submitted no less than sixty (60) days (or other time agreed to by the CPM) before commencement of commercial operation. The approved plan must be in place prior to commercial operation of the facilities and shall be kept at the site at all times.

The project owner, in consultation with the CPM, shall update the on-site contingency plan as necessary. The CPM may recommend revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Commission, the project owner shall review the on-site contingency plan and

recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM.

The on-site contingency plan shall provide for taking immediate steps to secure the facility from trespassing and encroachment. In addition, for temporary closures of more than 90 days (unless other arrangements are agreed to by the CPM), the plan shall provide for removal of hazardous materials and hazardous wastes, draining of all chemicals from storage tanks and other equipment and the safe shutdown of all equipment.

In addition, consistent with requirements under unexpected permanent closure addressed below, the nature and extent of insurance coverage, and major equipment warranties must be included in the on-site contingency plan. The status of the insurance coverage and major equipment warranties must also be updated in the annual compliance reports.

In the event of an unexpected temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, and e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of circumstances and the expected duration of the closure.

If a temporary closure is likely to be permanent, or of a duration of more than twelve months, a closure plan consistent with that for a planned closure shall be submitted to the CPM within 90 days of the determination. The CPM and project owner may agree to a period of time other than 90 days.

### ***Unexpected Permanent Closure***

In order to ensure that public health and safety and the environment are protected in the event of an unexpected permanent facility closure, it is essential to have an on-site contingency plan in place for unexpected permanent closure. This may be a part of the on-site contingency plan for unexpected temporary closure. The on-site contingency plan will help to ensure that all necessary steps to mitigate public health and safety, and environmental impacts, are taken in a timely manner (even in an unlikely abandonment scenario).

The project owner shall submit the on-site contingency plan for CPM review and approval. The plan shall be submitted no less than sixty (60) days (or other time agreed to by the CPM) prior to commencement of commercial operation. The approved plan must be in place prior to commercial operation of the facilities and shall be kept at the site at all times.

The project owner, in consultation with the CPM, shall update the on-site contingency plan as necessary. The CPM may recommend revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Commission, the project owner shall review the on-site contingency plan and

recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM.

The on-site contingency plan shall provide for taking immediate steps to secure the facility from trespassing and encroachment. In addition, the plan shall provide for removal of hazardous materials and hazardous wastes, draining of all chemicals from storage tanks and other equipment and the safe shutdown of all equipment.

Furthermore, the on-site contingency plan shall address how the project owner will ensure that all required closure steps will be successfully completed in the event of abandonment. The nature and extent of insurance coverage and major equipment warranties must also be included in the on-site contingency plan. In addition, the status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports.

In the event of an unexpected permanent closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, and e-mail, within twenty-four (24) hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the status of all closure activities.

## **DELEGATE AGENCIES**

To the extent permitted by law, the Commission may delegate authority for compliance verification and enforcement to various state and local agencies that have expertise in subject areas where specific requirements have been established as a Condition of Certification. If a delegate agency does not participate in this program, the Commission staff will establish an alternative method of verification and enforcement. The Commission reserves the right to direct Staff to independently verify compliance.

In performing construction and operation monitoring of the project, the Commission staff acts as, and has the authority of, the Chief Building Official (CBO). The Commission staff retains this authority when delegating to a local CBO. Delegation of authority for compliance verification includes the authority for enforcing codes, the responsibility for code interpretation as necessary, and the authority to use discretion as necessary in implementing the various codes and standards.

Whenever an agency's responsibility for a particular area is transferred by law to another entity, all references to the original agency shall be interpreted to apply to the successor entity.

## **ENFORCEMENT**

The Commission's legal authority to enforce the terms and conditions of its Decision is specified in Public Resources Code, §§ 25534 and 25900. The Commission may

amend or revoke the certification for any facility, and may impose a civil penalty for any significant failure to comply with the terms or conditions of the Commission Decision.

Moreover, to ensure compliance with the terms and Conditions of Certification and applicable laws, ordinances, regulations, and standards, delegate agencies are authorized to take any action allowed by law in accordance with their statutory authority, regulations, and administrative procedures.

## **NONCOMPLIANCE COMPLAINT PROCEDURES**

Any person or agency may file a complaint alleging noncompliance with the Conditions of Certification. Such a complaint will be subject to review by the Commission pursuant to Title 20, California Code of Regulations, § 1230 et seq., but in many instances the noncompliance can be resolved by using the informal dispute resolution process. Both the informal and formal complaint procedure are described below:

### ***Informal Dispute Resolution Procedure***

The following procedure is designed to informally resolve disputes concerning the interpretation of this compliance plan. The project owner, the Commission, or any other party, including members of the public, may initiate this procedure for resolving a dispute. Disputes may pertain to actions, inactions or decisions made by any party, including the Commission's delegate agents.

This procedure may precede the more formal complaint and investigation procedure specified in Title 20, California Code of Regulations, § 1230 et seq., but is not intended to be a substitute for, or prerequisite to, it. This informal procedure may not be used to change the terms and Conditions of Certification as approved by the Commission, although the agreed upon resolution may result in a project owner, or in some cases the Commission staff, proposing an amendment.

The procedure encourages all parties involved in a dispute to discuss the matter and to reach an agreement resolving the dispute. If a dispute cannot be resolved, then the matter must be referred to the full Commission for consideration via the complaint and investigation process. The procedure for informal dispute resolution is as follows:

### ***Request for Informal Investigation***

Any individual, group, or agency may request the Commission to conduct an informal investigation of alleged noncompliance with the Commission's terms and Conditions of Certification. All requests for informal investigations shall be made to the designated CPM.

Upon receipt of a request for informal investigation, the CPM shall promptly notify the project owner of the allegation by telephone and letter. All known and relevant information of the alleged noncompliance shall be provided to the project owner and to the Commission staff. The CPM will evaluate the request and the information to determine if further investigation is necessary. If the CPM finds that further investigation is necessary, the project owner will be required to promptly investigate the matter and, within seven (7) working days of the CPM's request, provide a written report to the CPM of the results of the investigation, including corrective measures proposed or undertaken. Depending on the urgency of the noncompliance matter, the CPM may conduct a site visit and/or request the project owner to provide an initial report, within forty-eight (48) hours, followed by a written report filed within seven (7) working days.

### ***Request for Informal Meeting***

If either the party requesting an investigation or the Commission staff is not satisfied with the project owner's report, investigation of the event, or corrective measures undertaken, either party may submit a written request to the CPM for a meeting with the project owner. Such request shall be made within fourteen (14) days of the project owner's filing of its written report. Upon receipt of such a request, the CPM shall:

- 1) Immediately schedule a meeting with the requesting party and the project owner, to be held at a mutually convenient time and place;
- 2) Secure the attendance of appropriate Commission staff and staff of any other agency with expertise in the subject area of concern as necessary;
- 3) Conduct such meeting in an informal and objective manner so as to encourage the voluntary settlement of the dispute in a fair and equitable manner; and,
- 4) After the conclusion of such a meeting, promptly prepare a summary memorandum which fairly and accurately identifies the positions of all parties and any conclusions reached. Copies shall be distributed to all in attendance and to the project file. If an agreement has not been reached, the CPM shall inform the complainant of the formal complaint process and requirements provided under Title 20, California Code of Regulations, section 1230 et seq.

### ***Formal Dispute Resolution Procedure-Complaints and Investigations***

The project owner, Commission staff, or any other party may file a complaint or a request for an investigation with the Commission's Chief Counsel. Disputes may pertain to actions or decisions made by any party including the Commission's delegate agents. Requirements for filing a complaint or a request for investigation and a description of how they are processed are in Title 20, California Code of Regulations,

section 1230 et seq. The formal process may be in lieu of or in addition to the informal process.

Within thirty (30) days after receipt of a written complaint or a request for investigation, the Chairperson or, if one is assigned, the Committee may grant a hearing on the matter, consistent with the requirements of noticing provisions. The Commission shall have the authority to consider all relevant facts involved and make any appropriate orders consistent with its jurisdiction (Title 20, California Code of Regulations, sections 1232 - 1236).

## **POST CERTIFICATION CHANGES TO THE COMMISSION DECISION: AMENDMENTS, STAFF CHANGES AND VERIFICATION CHANGES**

The project owner must petition the Commission, pursuant to Title 20, California Code of Regulations, section 1769, to 1) delete or change a Condition of Certification; 2) modify the project design or operational requirements; 3) transfer ownership or operational control of the facility; or 4) change a condition verification requirement.

The petition for a change must be submitted to the Commission's Docket in accordance with Title 20, California Code of Regulations, section 1209. The criteria under Section 1769 that determine which type of change process applies are explained below.

### ***Executive Order***

Executive Order D-25-01, issued by the Governor of the State of California, which accelerates processing of certain modifications, will be applied to all qualifying project amendments requested until December 31, 2001.

### ***Amendment***

A proposed change will be processed as an amendment requiring Commission approval if it involves a change to the requirement or protocol (and in some cases the verification) portion of a Condition of Certification, an ownership or operator change, or a potential significant environmental impact.

### ***Insignificant Staff Change***

The proposed change will be processed as an insignificant staff change, not requiring Commission approval, if it does not require changing the language in a Condition of Certification, does not have a potential significant environmental impact, and will not cause the project to violate laws, ordinances, regulations or standards.

## ***Verification Change***

The proposed change will be processed as a verification or insignificant change if it involves only the language in the verification portion of the Condition of Certification. This procedure can only be used to change verification requirements that are of an administrative nature, usually the timing of a required action. In the event that verification language contains technical requirements, the proposed change must be processed as an amendment requiring Commission approval.

## KEY EVENT LIST

PROJECT \_\_\_\_\_ DATE ENTERED \_\_\_\_\_

DOCKET # \_\_\_\_\_ PROJECT MANAGER \_\_\_\_\_

<i><b>EVENT DESCRIPTION</b></i>	<i><b>DATE ASSIGNED</b></i>
Date of Certification	
Start of Construction	
Completion of Construction	
Start of Operation (1st Turbine Roll)	
Start of Rainy Season	
End of Rainy Season	
Start T/L Construction	
Complete T/L Construction	
Start Fuel Supply Line Construction	
Complete Fuel Supply Line Construction	
Start Rough Grading	
Complete Rough Grading	
Start of Water Supply Line Construction	
Complete Water Supply Line Construction	
Start Implementing Erosion Control Measures	
Complete Implementing Erosion Control Measures	