

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND**

In the matter of the Application of)
Catoctin Power, LLC for a)
Certificate of Public Convenience and Necessity) Case No. 8997
to Construct a Nominal 600 MW Generating)
Facility in Frederick County, Maryland)

DIRECT TESTIMONY OF JOHN W. GRACE

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND CURRENT POSITION.**

2 A. My name is John Grace. I am Chief of the Source Protection and Appropriations
3 Division, which is part of the Maryland Department of the Environment Water
4 Management Administration (MDE WMA). The duties of the Source Protection
5 and Appropriations Division include surface and ground water appropriation
6 and use permitting, assessing the vulnerability of public water systems to
7 contamination and assisting in the development of source water protection
8 programs. A statement of my educational background, occupational history, and
9 professional qualifications is provided as Appendix A to this testimony.

10 **Q. HAVE YOU PARTICIPATED IN OTHER REGULATORY PROCEEDINGS?**
11 **AND IF SO, WHAT WAS THE NATURE OF YOUR ROLE?**

12 A. Yes. I have served as a hearing officer for public informational hearings
13 regarding water appropriation permit applications. As such I have rendered
14 decisions regarding whether or not to issue a permit and what conditions should
15 be placed on a permit.

16 **Q. WHAT ARE YOUR RESPONSIBILITIES WITH RESPECT TO MDE WMA’S**
17 **REVIEW OF THE CATOCTIN POWER’S WATER APPROPRIATION**
18 **REQUEST?**

19 A. I am responsible for reviewing Recommended License Conditions 44 through 54,
20 and 61 through 70 (DNR Exhibit __ (DHB-3)) to ensure that the
21 recommendations are consistent with the State’s regulations, policies, and
22 appropriation permits issued by MDE WMA. The Recommended License

1 Conditions are based on the technical evaluation performed by PPRP, which is
2 described in the direct testimony of Mr. Robert W. Keating (DNR Exhibit __
3 (RWK-1)) and contained in the PPRP report titled *Environmental Review of the*
4 *Proposed Catoctin Power Project* (DNR Exhibit __ (DHB-2A)).

5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

6 A. The purpose of my testimony two-fold: 1) present the basis for the State's
7 recommendations for the applicant's requested surface water appropriation; and
8 2) present the basis for the State's recommendations for the applicant's proposed
9 approach to comply with the Potomac River consumptive use regulations.

10 **Q. PLEASE DESCRIBE THE CONTENT OF YOUR DIRECT TESTIMONY**
11 **CONCERNING THE REVIEW OF CATOCTIN POWER'S REQUESTED**
12 **SURFACE WATER APPROPRIATION.**

13 A. I explain the following in my testimony:

- 14 1. The State's policy and regulatory-related controls on water
15 appropriations and consumptive use of Potomac River water;
- 16 2. The proposed source of water and appropriation amount, and a
17 determination of whether the requested appropriation meets the
18 regulatory requirement as reasonable; and
- 19 3. MDE WMA's support for the Recommended License Conditions, which
20 will minimize potential adverse impacts to surface water, other users,
21 and aquatic resources from the proposed appropriation.

22

23 *Maryland's Water Appropriation Process*

24 **Q. PLEASE DESCRIBE MARYLAND'S WATER APPROPRIATION POLICY.**

25 A. Although the Certificate of Public Convenience and Necessity (CPCN) issued by
26 the Public Service Commission incorporates the facility's water appropriation
27 permit, the State's laws and regulations are used to guide the State's decision-
28 making and preparation of recommended conditions regarding the water
29 appropriation. It is the policy of the State to conserve, protect, and use water
30 resources in accordance with the best interests of the people of Maryland and to

1 control, so far as feasible, the appropriation or use of surface and ground waters.
2 Maryland water allocations are guided by the common law doctrine of
3 reasonable use. Simply stated, this doctrine provides all landowners the
4 opportunity to make a reasonable use of the water associated with their property
5 and is limited only by the rights of other landowners. Furthermore, a water user
6 may not unreasonably harm the water resources of the State.

7 The Code of Maryland Regulations (COMAR) 26.17.06.05A codifies these policies
8 and authorizes a permit only for a beneficial use if three criteria are satisfied.
9 First, the amount of water to be appropriated must be reasonable in relation to
10 the anticipated level of use during the permit period. Second, the requested
11 appropriation or use must not have an unreasonable impact on the waters of the
12 State. Third, the requested appropriation must not have an unreasonable impact
13 on other users of the resource. These criteria are the basis for the conditions
14 proposed for the CPCN.

15 **Q. PLEASE DESCRIBE THE KEY ELEMENTS OF MARYLAND'S**
16 **REGULATIONS FOR THE CONSUMPTIVE USE OF THE POTOMAC**
17 **RIVER.**

18 A. Maryland has regulations governing consumptive use of surface water resources
19 in the Potomac River Basin (COMAR 26.17.07). Consumptive use is defined in
20 COMAR 26.17.07.01.B. as "that portion of a water withdrawal which, as a result
21 of evaporation, interbasin diversions, or other means, is not returned to the
22 source to be available for subsequent use." Under these requirements, new
23 nonresidential users consuming more than 1 million gallons per day (MGD)
24 must provide upstream storage to augment the river flow during low-flow
25 conditions, or reduce their consumptive water use to levels of 1 MGD or less
26 during those times.

27 **Q. DID CATOCTIN POWER PROVIDE ADEQUATE TECHNICAL**
28 **INFORMATION FOR MDE WMA TO DETERMINE THAT THE PROPOSED**
29 **USE OF WATER AND ASSOCIATED IMPACTS TO THE RIVER AND**
30 **OTHER USERS IS REASONABLE?**

1 A. Yes, Catoctin Power described the proposed use and amount of water needed in
2 the facility throughout the year to demonstrate that the amount of water needed
3 for facility operations is reasonable. Further, Catoctin Power provided detailed
4 water balance information for average and peak summer conditions in support
5 of the operating assumptions and climatic conditions that were used to generate
6 the average and maximum water use amounts.

7 Catoctin Power also provided sufficient technical information in their CPCN
8 application to facilitate the State's assessment of potential impacts to surface
9 water resources and other users. With respect to surface water, Catoctin Power
10 provided information regarding of the amount of total river flow at Point of
11 Rocks and compared this to the amount requested. During all but periodic
12 drought periods, Catoctin Power indicated that their requested water
13 withdrawal and consumptive use would be insignificant relative to the river
14 flow.

15 **Q. DID YOU RELY OTHER INFORMATION TO DETERMINE WHETHER THE**
16 **PROPOSED USE OF SURFACE WATER IS REASONABLE?**

17 A. Yes, I used the technical information and analysis provided by PPRP, as
18 described in the direct testimony of Mr. Robert W. Keating (DNR Exhibit __
19 (RWK-1)) and in the PPRP Environmental Review Document (DNR Exhibit __
20 (DHB-2A)). I used this information to determine whether the impacts associated
21 with the proposed water use were reasonable and in accord with Maryland's
22 water appropriations regulations and policy.

23 *Proposed Water Appropriation from the Potomac River*

24 **Q. PLEASE DESCRIBE CATOCTIN POWER'S SOURCES OF WATER FOR THE**
25 **POWER PLANT OPERATIONS.**

26 A. Catoctin Power is considering two options for cooling water makeup: 1) use of
27 reclaimed water from Frederick County's Ballenger Creek WWTP, supplemented
28 with potable water purchased from Frederick County to meet shortfalls in
29 demand for cooling tower makeup; and 2) direct withdrawal from the Potomac
30 River for cooling tower makeup. Both sources will be supplemented with the
31 purchase of potable water from Frederick County for other plant water needs. It

1 is my understanding that Catoctin Power’s preferred water supply alternative is
2 reclaimed water. However, Catoctin Power has been unable to obtain approval
3 from the Frederick County Board of County Commissioners to use the reclaimed
4 water. Therefore, Catoctin Power has proposed direct withdrawal from the
5 Potomac River as a secondary alternative.

6 **Q. PLEASE DESCRIBE CATOCTIN POWER’S PROPOSED WATER**
7 **APPROPRIATION FROM THE POTOMAC RIVER.**

8 A. Catoctin Power has proposed to utilize surface water from the Potomac River.
9 The water will be withdrawn from the River at a location in the vicinity of Point
10 of Rocks. It is my understanding that the exact location of withdrawal will be
11 determined either after Catoctin Power obtains a right-of-way permit from the
12 National Park Service to install an intake structure within the C&O Canal
13 National Historic Park, or after they determine whether they can place the intake
14 structure under the U.S. Route 15 bridge on the Maryland State Highway
15 Administration property.

16 Catoctin Power has indicated that on average, the combined cycle facility will
17 withdraw 2.43 MGD of water from the Potomac River, and use the water solely
18 for cooling tower makeup. Water lost from the cooling system through
19 evaporation or discharge will be replenished using makeup water. Of this, a
20 total of 2.20 MGD will be consumed through evaporation or drift from the
21 cooling tower. The actual withdrawal and consumption will depend on load, the
22 hours of operation, the number of turbines in operation, and the ambient
23 temperature. Catoctin Power estimates that the maximum daily withdrawal will
24 be 4.03 million gallons with 3.63 MGD consumed.

25 **Q. PLEASE DESCRIBE CATOCTIN POWER’S PROPOSED APPROACH TO**
26 **COMPLY WITH THE POTOMAC RIVER CONSUMPTIVE USE**
27 **REGULATIONS.**

28 A. Catoctin Power has proposed to meet the consumptive use regulations by
29 providing low flow augmentation (LFA) storage upstream of the power plant to
30 augment river flow during low-flow conditions. Further, Catoctin Power
31 committed in their CPCN application to meet these requirements regardless of

1 the source of water used because both water sources are derived from the
2 Potomac River Basin.

3 Catoclin Power has identified two potential LFA facilities, namely the Millville
4 and Old Standard quarries located upstream along the Shenandoah River in
5 Jefferson County, West Virginia. Each quarry has a sufficient amount of water in
6 storage to exceed the regulatory requirement of 468 million gallons pursuant to
7 COMAR 26.17.07.03.C. Catoclin Power will release water from LFA storage to
8 the Shenandoah River during low-flow periods in an amount equivalent to their
9 maximum daily consumptive use of 3.63 MGD.

10 **Q. WHAT IS MDE WMA'S DETERMINATION REGARDING THE**
11 **REASONABLENESS OF THE SURFACE WATER APPROPRIATION?**

12 A. MDE WMA has concluded that the requested amount of water for the Catoclin
13 facility is reasonable given the proposed use and operating assumptions, and its
14 general consistency with the requested amounts for other recent combined cycle
15 power plants in Maryland.

16 **Q. WHAT IS MDE WMA'S POSITION REGARDING THE AMOUNT OF THE**
17 **SURFACE WATER APPROPRIATION?**

18 A. The withdrawal of up to 4.03 MGD and consumption of up to 3.63 MGD of
19 surface water for cooling water use presents no significant impact during normal
20 Potomac River flow conditions. During low-flow periods, which MDE WMA has
21 defined in Recommended License Condition 62 as equal to or below the 10-year,
22 7-day low flow at the USGS Point of Rocks Gauging Station of 860 cubic feet per
23 second (or 556 MGD), Catoclin Power will be required to release water from their
24 LFA facility in an amount equal to their preceding daily consumptive use.
25 Catoclin Power will also be required under Recommended License Condition 62
26 to release water from their LFA facility when the ICPRB Co-op orders a release of
27 water from the water supply storage portion of Jennings Randolph Reservoir.
28 MDE WMA and PPRP believe that using the thresholds of the 7Q10 at the Point
29 of Rocks USGS gauge or when water is released from Jennings Randolph
30 Reservoir is an approach that will adequately protect the resource, downstream
31 users and aquatic biota.

1 The recommendation that Catoctin Power meet the regulatory requirements
2 under COMAR 26.17.07 regarding consumptive withdrawals from the Potomac
3 River, including the need to provide low flow augmentation when releases from
4 the upstream reservoir are made, ensure that Catoctin will not consume water
5 that has been released from the upstream reservoir to meet demand in the
6 Washington metropolitan area during a drought emergency period. This will
7 ensure that the proposed Catoctin facility will have no significant adverse effect
8 on the adequacy of the existing reservoir system to meet the water supplier's
9 needs

10 Further, it is MDE WMA's position that the releases from LFA storage during
11 low flow periods to off-set consumptive use provides reasonable accommodation
12 for new users of the river, consistent with the reasonable use doctrine that guides
13 determinations on Maryland water allocations.

14 **Q. WHAT IS MDE WMA'S JUDGMENT REGARDING CATOCTIN POWER'S**
15 **PROPOSED APPROACH TO COMPLY WITH POTOMAC RIVER**
16 **CONSUMPTIVE USE REGULATIONS?**

17 **A.** MDE WMA accepts Catoctin Power's proposed approach of using releases from
18 LFA storage to comply with the Consumptive Use regulations. Each quarry has
19 sufficient capacity to provide the 468 million gallons of LFA storage, as required
20 in COMAR 26.17.07.03.C. This volume of water storage should be adequate to
21 support the number and frequency of potential releases that may be required to
22 be released from storage based on recent and long-term history of river flow.
23 The calculated amount of storage is sufficient such that releases from storage in
24 the amount equivalent to the maximum daily consumptive use of 3.63 MGD
25 could be made for 129 days in any given year, which roughly corresponds to the
26 July through October period when river flow could be the lowest.

27 Catoctin Power is proposing to measure the amount of water released from
28 storage by measuring the change in water level associated with one day of
29 maximum augmentation of 3.63 MGD in each quarry, as well as measuring total
30 flow released using a flow totalizing flow meter or information obtained from
31 pump curves.

1 Q. HAS MDE WMA IDENTIFIED ANY UNCERTAINTIES ASSOCIATED WITH
2 CATOCTIN POWER'S PROPOSED APPROACH TO COMPLY WITH
3 POTOMAC RIVER CONSUMPTIVE USE REGULATIONS? IF SO, WHAT
4 ARE THEY AND HOW DO YOU PROPOSE THEY BE RESOLVED?

5 A. Yes, although we agree with Catoctin Power's overall approach to meet the
6 consumptive use requirements, MDE WMA and PPRP believe there are near-
7 term uncertainties associated with their proposed LFA approach. These
8 uncertainties include: 1) the ability to accurately measure drawdown in the
9 Millville Quarry during low flow augmentation; 2) the ability to account for the
10 potential loss or gain of quarry water to the surrounding geologic formation at
11 the Millville Quarry; and 3) the potential impact of water quality concerns in the
12 Old Standard Quarry will have on the ability to discharge the water into the
13 Shenandoah River.

14 MDE WMA and PPRP recommend that the near-term uncertainties be resolved
15 prior to the initiation of withdrawal of water from the Potomac River, or the use
16 of reclaimed water from Frederick County, through the conduct of three studies
17 as described in Recommended License Conditions 63, 64 and 66.

18 In addition, there is long-term uncertainty associated with whether 468 million
19 gallons of storage is adequate during the lifetime of the power plant because of a
20 growth in water demand and the potential to experience more severe droughts.
21 MDE WMA recommends in Recommended License Condition 70 that long-term
22 uncertainty associated with the adequacy of the amount of LFA storage be
23 resolved every 12 years through the reevaluation of the amount of storage
24 needed using updated information relative to water demand and river flow.

25 *Recommended License Conditions for the Potomac River Withdrawal*
26 *and Consumptive Use Compliance*

27 Q. WHAT IS MDE WMA'S RECOMMENDATION REGARDING THE
28 AMOUNT OF THE SURFACE WATER APPROPRIATION?

29 A. MDE WMA supports Recommended License Conditions 45, 61, and 62 in (DNR
30 Exhibit __ (DHB-3)). Recommended License Condition 45 authorizes a daily
31 average appropriation rate of 2,500,000 gallons for normal operations on a yearly

1 basis, with the maximum daily withdrawal not to exceed 4,100,000 gallons.
2 Recommended License Condition 61 requires Catoctin Power to store 468 million
3 gallons for LFA. Recommended License Condition 62 requires Catoctin Power to
4 release water from LFA storage when flow in the Potomac River at the USGS
5 Point of Rocks Gauging Station is equal to or below the 10-year, 7-day low flow
6 of 860 cfs, or on days when the ICPRB Co-op orders releases from Jennings
7 Randolph reservoir.

8 **Q. IS CATOCTIN POWER REQUIRED TO DEMONSTRATE APPROVALS BY**
9 **THE QUARRY OWNERS, AS WELL AS ANY APPROVALS THAT MAY BE**
10 **REQUIRED UNDER FEDERAL, STATE, OR LOCAL LAWS AND**
11 **REGULATIONS?**

12 A. Yes, demonstration of approvals is required in Recommended License
13 Conditions 68 and 69 (DNR Exhibit __ (DHB-3)), and is required pursuant to
14 COMAR 26.17.07.03.F. to ensure that the LFA facility is operated in compliance
15 with Maryland's and other jurisdiction's regulations. Specifically,
16 Recommended License Condition 68 requires Catoctin Power to secure all
17 necessary agreements with the owners of the Millville and Old Standard
18 quarries, and provide MDE WMA with a signed affidavit indicating that the
19 necessary agreements have been obtained to ensure that the quarry water can be
20 released from storage when required under Condition 62. Recommended
21 License Condition 69 requires Catoctin Power to secure all necessary permits and
22 approvals that may be applicable under federal, state or local laws and
23 regulations, and provide MDE WMA copies of all necessary permits and
24 approvals to ensure that the quarry water can be released from storage when
25 required under Condition 62.

26 **Q. IS CATOCTIN POWER REQUIRED TO MONITOR THE AMOUNT OF**
27 **SURFACE WATER WITHDRAWN, THE AMOUNT OF THIS WATER THAT IS**
28 **CONSUMED, AND THE AMOUNT OF WATER RELEASED FROM LFA**
29 **STORAGE?**

30 A. Yes, monitoring of these actions is required in Recommended License Conditions
31 54, 60, and 62 (DNR Exhibit __ (DHB-3)). Recommended License Conditions 54 and
32 60 require the submittal of semi-annual withdrawal and consumptive use

1 measurement reports to MDE WMA, regardless of whether Potomac River or
2 reclaimed water is used. Recommended License Condition 62 requires Catoctin
3 Power to notify MDE WMA and the ICPRB Co-op within 24 hours if a release from
4 low flow augmentation storage is made, and report the amount of water released
5 from storage.

6 **Q. WILL THE WMA EVALUATE THE POTENTIAL EFFECTS OF INCREASING**
7 **SURFACE WATER USE IN THE POTOMAC RIVER BASIN OVER TIME? IF**
8 **SO, HOW?**

9 A. Yes, we will. As stated in Recommended License Conditions 48 and 49 (DNR
10 Exhibit __ (DHB-3)), we review the appropriation every three years, or more
11 frequently if necessary, and renew the permit every 12 years, in accordance with
12 the requirements set forth in COMAR 26.17.06. The purpose of the triennial review
13 and twelve-year permit renewal is to ensure that the quantity of water withdrawn
14 by the applicant does not cause an unreasonable impact to other users, if the
15 surrounding water use changes. MDE WMA has the right to adjust the quantity of
16 water a user is appropriating if necessary to ensure that all users can make
17 reasonable use of surface water.

18 As mentioned previously, increasing demand for water in the Potomac River basin
19 creates uncertainty associated with the long-term adequacy of the amount of LFA
20 storage. In Recommended License Condition 70 (DNR Exhibit __ (DHB-3)), the
21 MDE WMA recommends that this uncertainty be alleviated through the
22 reevaluation of the amount of storage needed using updated information relative to
23 water demand and river flow coincident with the 12-year permit renewal process.

24 **Q. BASED ON YOUR REVIEW OF THE BACKGROUND INFORMATION**
25 **PRESENTED FOR THIS APPROPRIATION REQUEST AND YOUR**
26 **KNOWLEDGE AND EXPERIENCE IN WATER APPROPRIATIONS FOR**
27 **THE STATE, ARE THE RECOMMENDED LICENSE CONDITIONS FOR**
28 **THE USE OF POTOMAC RIVER WATER CONSISTENT WITH THE**
29 **STATE'S REGULATIONS, POLICIES, AND PAST PERMITS?**

30 A. Yes they are.

1 Q. ARE THESE RECOMMENDED LICENSE CONDITIONS CONSISTENT WITH
2 THOSE IMPOSED ON ANY OTHER WATER USER IN THE STATE?

3 A. Yes they are. In fact, they are based on the water use permit conditions listed under
4 COMAR 26.17.06, the Potomac River consumptive use regulations listed under
5 COMAR 26.17.07, and consistent with our statutory authority under §5-507(b)(1).

6 Q. ARE YOU FAMILIAR WITH THE TERMS OF THE AGREEMENT BETWEEN
7 CATOCTIN POWER AND THE WASHINGTON METROPOLITAN AREA
8 WATER SUPPLIERS REGARDING WHEN RELEASES FROM LOW FLOW
9 AUGMENTATION STORAGE WILL OCCUR?

10 A. Yes I am. It is my understanding that Catoctin Power and the Washington
11 metropolitan area water suppliers (WAS) entered into an agreement to define the
12 terms under which Catoctin Power will store water for LFA storage and make releases
13 from storage. Assuming that the terms of the final executed agreement are identical to
14 the October 6, 2004 draft version provided to PPRP and MDE WMA for review, the
15 key provisions of the proposed agreement will require Catoctin Power to: 1) maintain
16 a maximum of 470 million gallons of water in storage; 2) release water from storage
17 when water is released from Jennings Randolph or Little Seneca reservoirs, or when
18 flow at the USGS gauge (01646500) near the Washington D.C. Little Falls Pumping
19 Station drops below 1,000 cubic feet per second (cfs) at an instantaneous, real-time
20 flow during a calendar day; and 3) release an amount of water that will not exceed the
21 projected maximum daily consumptive use for the power plant.

22 Q. DOES THE WMA HAVE CONCERN WITH THIS AGREEMENT?

23 A. The agreement specifically recognizes the authority of the State of Maryland to
24 direct Catoctin Power to release water from LFA storage pursuant to COMAR
25 26.17.07.03. With the understanding that nothing contained in the agreement is
26 intended to supercede the statutory and regulatory authority of the State of
27 Maryland or its agencies, MDE WMA does not object to the incorporation of the
28 provisions of the agreement as conditions to the CPCN.

29 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

30 A. Yes, it does.

Appendix A

Statement of Qualifications

APPENDIX A

STATEMENT OF QUALIFICATIONS FOR

JOHN W. GRACE

Division Chief, Maryland Department of the Environment Source Protection and Appropriations Division

Mr. John W. Grace serves as the Division Chief of the Source Water Protection and Appropriations Division within the Water Supply Program in the Maryland Department of the Environment. He works to protect drinking water supply sources and to ensure that the water resources of Maryland are conserved and managed in the best interest of the people of Maryland. His Division is responsible for completing source water assessments for all public water systems in Maryland, assisting in the development of source water protection programs and is responsible for implementing Maryland's water appropriation permit program. He provides leadership to a team of 15 MDE employees who undertake this mission. Mr. Grace has worked for 19 years in MDE's Water Management Administration dealing with complex water supply and water resource issues. Mr. Grace received a B. S. from Allegheny College (Meadville, PA) in 1978 and a M. S. in Civil and Environmental Engineering from the University of Rhode Island in 1981.

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND**

In the matter of the Application of)
Catoctin Power, LLC for a)
Certificate of Public Convenience and Necessity) Case No. 8997
to Construct a Nominal 600 MW Generating)
Facility in Frederick County, Maryland)

DIRECT TESTIMONY OF ROBERT W. KEATING

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND CURRENT POSITION.**

2 A. My name is Robert W. Keating. I am a hydrogeologist with Environmental
3 Resources Management, Inc. (ERM) in Annapolis, Maryland. I am a Principal
4 with the firm. A statement of my educational background, occupational history,
5 and professional qualifications is appended to this testimony as Appendix A.

6 **Q. DO YOU HOLD ANY PROFESSIONAL REGISTRATIONS?**

7 A. Yes. I am certified as a Professional Geologist in the Commonwealths of Virginia
8 and Pennsylvania.

9 **Q. WHAT IS ERM’S RELATIONSHIP WITH THE DEPARTMENT OF
10 NATURAL RESOURCES (DNR) POWER PLANT RESEARCH PROGRAM
11 (PPRP)?**

12 A. ERM is the Environmental Engineering Integrator (EEI) for PPRP. In this
13 capacity, ERM provides PPRP with technical expertise in hydrogeology, soils
14 science, risk assessment, water supply, coal combustion by-product
15 management, and power plant engineering.

16 **Q. PLEASE DESCRIBE YOUR RELEVANT EXPERIENCE WITH THE EEI
17 CONTRACT.**