## Fort Martin - Woodside Double Circuit 500 kV

#### **General Information**

Proposing entity name Company Specific Information

Does the entity who is submitting this proposal intend to be the Company Specific Information Designated Entity for this proposed project?

Joint proposal ID 919

Company proposal ID Company Specific Information

PJM Proposal ID 896

Project title Fort Martin - Woodside Double Circuit 500 kV

Project description Convert the 500kV single circuit 502 Junction - Woodside 500kV project under development (PJM

Baseline Upgrade ID b3800.102) to a double circuit configuration between Fort Martin and the

NEETMA/APS interconnection point in Frederick County, VA, to accommodate Circuit 1

(b3800.102: 502 Junction - Black Oak - Woodside 500kV) and Circuit 2 (Fort Martin - Sandy Creek

- Woodside 500kV).

Email Company Specific Information

Project in-service date 12/2031

Tie-line impact Yes

Interregional project No

Is the proposer offering a binding cap on capital costs?

Additional benefits Company Specific Information

## **Project Components**

- 1. Sandy Creek 500kV Substation
- 2. 502 Junction NEETMA/APS Handoff

- 3. Woodside 500kV Substation upgrades 4. 01-106J (Bruce Mills 138kV Switchyard) substation upgrade 5. Fort Martin substation upgrade
- 6. Doubs substation upgrade
- 7. Brighton terminal equipment upgrades
- 8. b.3800.102 NEET/FE Interconnection Woodside 500kV
- 9. Sandy Creek 01-106J 138kV
- 10. 01-106J Brandonville/01-106J Albringht #2 138kV

### **Greenfield Substation Component**

Component title Sandy Creek 500kV Substation Project description Company Specific Information Substation name Sandy Creek Substation description AC Air Insulated Substation (AIS): New proposed 500-138kV Substation. New 500kV ring switchyard with three (3) line terminals, three (3) 500kV, 5000A, 63kAIC breakers, one (1) 500-138kV, 485 MVA transformer bank. AC Nominal voltage Nominal voltage 500

**Transformer Information** 

Name Capacity (MVA) Transformer 500-138Kv Xfrm #1 485 High Side Low Side **Tertiary** Voltage (kV) 500 138

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Major equipment description

Summer (MVA)

Winter (MVA)

Environmental assessment

AC Air Insulated Substation (AIS): New proposed 500-138kV Substation. New 500kV ring switchyard with three (3) line terminals, three (3) 500kV, 5000A, 63kAIC breakers, one (1) 500-138kV, 485 MVA transformer bank.

Normal ratings Emergency ratings

485.000000 619.000000

569.000000 654.000000

Environmental constraints were evaluated within the proposed substation parcel and are manageable through avoidance, minimization, and mitigation strategies. The proposed parcel contains one NWI-mapped wetland. According to FEMA, no portion of the proposed substation parcel contains any 100-year floodplains or regulated floodways. No major watercourses are located within the proposes parcel. However, it is assumed any overland flow will drain to Big Sandy Creek and its downstream tributaries. No fatal flaws have been identified for the Project. Based on publicly available data, no previously recorded archaeological sites, cemeteries, or architectural resources were recorded within the immediate vicinity of the proposed substation parcel. Additionally, no historic districts located within the immediate vicinity of the Site. Three federally listed species (3 endangered and 1 proposed) have known ranges within the vicinity of the site. No critical habitat was identified within the vicinity of the proposed substation parcel. If suitable habitat is identified or regulations change, agency coordination & species-specific surveys will occur. The project intends to follow suggested tree removal windows & general time of year restrictions to avoid/minimize impacts to species such as federally listed bats and migratory birds, among others. Industry standard construction BMPs & avoidance and minimization measures will be used to prevent unanticipated impacts to natural resources to the maximum extent practicable. There are no environmental concerns with the proposed project that cannot be addressed through agency coordination and mitigation. No 'Major Federal Action' that would invoke NEPA is anticipated to result from the proposed project. See Attachment 8 – Permitting Plan.

Outreach plan

Land acquisition plan

Construction responsibility

Benefits/Comments

Component Cost Details - In Current Year \$

Engineering & design

Permitting / routing / siting

ROW / land acquisition

Materials & equipment

Construction & commissioning

Construction management

The proposer is committed to informing the public about the project to the greatest extent practicable while working with all interested stakeholders including landowners through a robust public outreach program to address and respond to community concerns. A well-designed public outreach program can have numerous benefits, including fostering cooperative relationships with landowners and other stakeholders, expediting the regulatory permitting process, and assisting with project development. In general, the purpose of the community outreach plan is to gain community support for the project. In the affected communities, the proposer's public outreach plan will educate the public and relevant stakeholders on specific project details to enable timely regulatory approvals and construction activities. Elements of the public outreach plan will include the following: 1) Identify potential issues at an early stage by engagement with key community stakeholders at the outset; 2) Broaden the community engagement process to identify potential and relevant community benefits that can facilitate community support for the proposed project; 3) Develop a broad base of community support for the proposed project before the regulatory agencies; and 4) Develop a comprehensive administrative record documenting the community outreach process that can be presented to the regulatory agency or, in the event of a legal challenge, to the appropriate court. The outreach plan proposes to dedicate considerable time and resources in engaging the community, and specifically the affected community during the planning process to identify highly sensitive areas in order to develop a project that has the least amount of cultural, environmental, and social impacts. The plans will reflect avoidance of impacts rather than mitigation. However, in some cases, if avoidance is not possible, then the proposer will involve landowners and other stakeholders in providing appropriate and practical mitigation measures. Public outreach activities by the proposer will begin following project award.

See Attachment 9.

Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$70,121,689.00

Component cost (in-service year) \$79,336,254.00

**Transmission Line Upgrade Component** 

Component title 502 Junction - NEETMA/APS Handoff

Project description Company Specific Information

Impacted transmission line 502 Junction - Black Oak - Woodside 500kV

Point A 502 Junction

Point B Black Oak

Point C Woodside

Terrain description A detailed inspection of the USGS topographic map reveals relatively co

A detailed inspection of the USGS topographic map reveals relatively consistent, moderately sloped terrain, with elevation within the proposed Project ranging from a high of 2,894 ft above sea level to a low of 574 ft above sea level. The Project is located within 7 Level IV ecoregions (Northern Shale Valleys, Northern Sandstone Ridges, Northern Dissected Ridges and Knobs, Forested Hills and Mountains, Uplands and Valleys of Mixed Land Use, Monongahela Transition Zone, and Pittsburgh Low Plateau). According to the NLCD, the Project area largely consists of cultivated cropland, deciduous forest, wetlands, hay/pasture, mixed forest, shrub/scrub, open water, and developed,

open space.

**Existing Line Physical Characteristics** 

Operating voltage 500

Conductor size and type 3x bundled 1780 kcmil ACSR 84/19 Chukar

Hardware plan description

Approved 502 Junction - Woodside 500 kV project (PJM Baseline Upgrade ID b3800.102) has not been constructed so no existing hardware will be impacted.

been constructed so no existing hardware will be impacted.

Tower line characteristics

Approved 502 Junction - Woodside 500kV project (PJM Baseline Upgrade ID b3800.102) has not

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**Proposed Line Characteristics** 

Designed Operating

Voltage (kV) 500.000000 500.000000

Normal ratings Emergency ratings

Summer (MVA) 5101.000000 5332.000000

Winter (MVA) 6110.000000 6330.000000

Conductor size and type 3x1780 KCMIL ACSS/MA3 54/19 Chukar

Shield wire size and type 2x0.575 48ct OPGW

Rebuild line length 100

Rebuild portion description

The entire circuit shall be upgraded to a double circuit from a single circuit from the point where the Fort Martin - Sandy Creek circuit joins the 502 Junction - Black Oak circuit until the point at which

the Sandy Creek - Woodside circuit transitions to single circuit towers. See Attachment 4 for more

information on location of double circuit structures.

Right of way Existing right-of-way to be used for upgrading the single circuit to a double circuit. ROW

Adjustments may be required in specific locations to mitigate engineering and/or operational risks.

Construction responsibility Company Specific Information

Benefits/Comments Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$340,176,779.00

Component cost (in-service year) \$384,878,801.00

**Substation Upgrade Component** 

Component title Woodside 500kV Substation upgrades

Project description Company Specific Information

Substation name Woodside

Substation zone APS

Substation upgrade scope Expand the 500kV breaker and a half switchyard by adding (2) 500kV breakers to create (1) bay

and (1) line position. Install (2) 500kV capacitor banks.

Transformer Information

None

New equipment description Add (2) 500kV, 5000A, 63kAIC breakers to create (1) additional line position. Add (2) 500kV, 450

MVAR capacitor banks.

Substation assumptions Woodside substation is currently underdevelopment and has not begun construction. Proposed

expansion will be incorporated into ongoing engineering and design.

Real-estate description Proposed expansion will not require new real estate.

Construction responsibility Company Specific Information

Benefits/Comments Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$26,146,668.00

Component cost (in-service year) \$29,582,554.00

**Substation Upgrade Component** 

Component title 01-106J (Bruce Mills 138kV Switchyard) substation upgrade

Project description Company Specific Information

Substation name 01-106J (Bruce Mills 138kV Switchyard)

Substation zone APS

Substation upgrade scope Expand the existing 138kV substation by adding (4) 138kV breakers.

**Transformer Information** 

None

New equipment description Add (4) 138kV, 5000A, 63kAIC breakers.

Substation assumptions Assumes required equipment upgrades occur in existing footprint or on adjacent incumbent owned

property.

Real-estate description No aerial imagery or parcel data was available at time of submission.

Construction responsibility Company Specific Information

Benefits/Comments Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$4,556,250.00

Component cost (in-service year) \$4,556,250.00

**Substation Upgrade Component** 

Component title Fort Martin substation upgrade

Project description Company Specific Information

Substation name Fort Martin

Substation zone APS

Substation upgrade scope Expand the existing 500kV double breaker double bus (DBDB) switchyard by adding (2) 500kV breakers to create (1) new bay with (1) new line position. Replace (9) existing 500kV breakers.

**Transformer Information** 

None

New equipment description Add (2) 500kV, 5000A, 63kAlC breakers. Replace (9) existing 500kV breakers with 500kV, 5000A, 63kAlC breakers.

Substation assumptions Assumes that fence line must be expanded to west to accommodate upgrades.

Real-estate description Based on publicly available parcel data and imagery, upgrades are expected to fit on

transmission-owner owned property.

Construction responsibility Company Specific Information

Benefits/Comments Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$4,976,484.00

Component cost (in-service year) \$4,976,484.00

Substation Upgrade Component

Component title Doubs substation upgrade

Project description Company Specific Information

Substation name Doubs

Substation zone APS

Substation upgrade scope Transmission owner to upgrade terminal equipment.

#### **Transformer Information**

None

New equipment description Transmission owner to upgrade terminal equipment.

Substation assumptions No substation layout changes expected.

Real-estate description

Based on publicly available parcel data and imagery, upgrades are expected to fit on incumbent

owned property.

Construction responsibility Company Specific Information

Benefits/Comments Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$5,854,688.00

Component cost (in-service year) \$5,854,688.00

Substation Upgrade Component

Component title Brighton terminal equipment upgrades

Project description Company Specific Information

Substation name Brighton

Substation zone PEPCO

Substation upgrade scope Transmission owner to upgrade terminal equipment.

Transformer Information

None

New equipment description Transmission owner to upgrade terminal equipment.

Substation assumptions Assumes required equipment upgrades occur in existing footprint.

Real-estate description

Based on publicly available parcel data and imagery, upgrades are expected to fit fully within

existing fenceline on incumbent owned property.

Construction responsibility Company Specific Information

Benefits/Comments Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$2,927,344.00

Component cost (in-service year) \$2,927,344.00

#### **Greenfield Transmission Line Component**

Component title b.3800.102 NEET/FE Interconnection - Woodside 500kV

Project description Company Specific Information

Point A b3800.102 NEET/FE Handoff

Point B Woodside

Point C

Normal ratings Emergency ratings

Summer (MVA) 5101.000000 5332.000000

Winter (MVA) 6110.000000 6330.000000

Conductor size and type 3 bundled 1780 KCMIL ACSS/MA3 84/19 Chukar

Nominal voltage AC

Nominal voltage 500

Line construction type Overhead

General route description

The approximately 17-mile route in Frederick County, Virginia travels eastward from the MARL

NEET/FE handoff, paralleling the existing Mt. Storm to Doubs 500kV corridor where feasible.

Terrain description

A detailed inspection of the USGS topographic map reveals relatively consistent, moderately sloped terrain, with elevation within the Project ranging from a high of 1,262 ft above sea level to a low of 590 ft above sea level. The Project is located within 2 Level IV ecoregions (Northern

Limestone/Dolomite Valleys and Northern Shale Valleys). According to the NLCD, the Project area largely consists of cultivated cropland, deciduous forest, hay/pasture, shrub/scrub, and developed,

open space.

Right-of-way width by segment

The route will have a 200 ft ROW width. The proposed ROW will be an expansion of existing transmission line corridors for approximately 20% of the route length, the remainder will be

greenfield ROW.

Electrical transmission infrastructure crossings

See Attachment 4 (Google Earth .kmz file) for crossing locations.

Civil infrastructure/major waterway facility crossing plan

**Environmental impacts** 

Tower characteristics

Construction responsibility

Benefits/Comments

Component Cost Details - In Current Year \$

Engineering & design

Permitting / routing / siting

ROW / land acquisition

Materials & equipment

Construction & commissioning

See Attachment 5 (Crossing Plan) and Attachment 4 (Google Earth .kmz file).

Environmental constraints were evaluated within the vicinity of the proposed project route and are manageable through avoidance, minimization, and mitigation strategies incorporated at the onset of the routing/siting process. The proposed route crosses numerous aquatic resources, including wetlands, lakes/ponds, and streams but most features could be spanned & avoided with minimal impacts. According to FEMA, multiple 100-year floodplains are crossed by the route. This represent total amount of features crossed by the route & impacts from the Project would be significantly less. No major watercourses are crossed by the Project which would require agency authorizations for navigable water or State Scenic River crossings. No fatal flaws have been identified for the Project. Multiple previously recorded archaeological sites, cemeteries, & architectural resources were recorded within the route. However, no historic districts are crossed by the proposed route. Four federally listed species (2 endangered and 2 proposed) have known ranges along the proposed route. No critical habitat for any federally listed species intersects the route. If suitable habitat is identified or regulations change, agency coordination & species-specific surveys will occur. The project intends to follow suggested tree removal windows & general time of year restrictions to avoid/minimize impacts to species such as federally listed bats and migratory birds, among others. Industry standard construction BMPs & avoidance and minimization measures will be used to prevent unanticipated impacts to natural resources to the maximum extent practicable. There are no environmental concerns with the proposed project that cannot be addressed through agency coordination, mitigation, & an in-depth routing/siting process. No 'Major Federal Action' that would invoke NEPA is anticipated to result from the proposed route. See Attachment 8 – Permitting Plan.

The proposed structures will mostly be single circuit 500kV lattice self-supporting or guyed-v towers in a horizontal conductor configuration. Delta configuration may be required in some locations. All angle structures will be self-supporting. See structure drawing set included in Attachment 10.

Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$99,094,841.00

Component cost (in-service year) \$112,116,718.00

**Greenfield Transmission Line Component** 

Component title Sandy Creek - 01-106J 138kV

Project description Company Specific Information

Point A Sandy Creek

Point B 01-106J

Point C

Normal ratings Emergency ratings

Summer (MVA) 1025.000000 1056.000000

Winter (MVA) 1102.000000 1129.000000

Conductor size and type 2 bundled 1272 KCMIL ACSS/MA3 54/19 Pheasant

Nominal voltage AC

Nominal voltage 138

Line construction type Overhead

General route description

The approximately 1-mile route parallels the Hazelton to Lake Lynn 138 kV.

Terrain description Right-of-way width by segment Electrical transmission infrastructure crossings Civil infrastructure/major waterway facility crossing plan **Environmental impacts** Tower characteristics

Construction responsibility

Component Cost Details - In Current Year \$

Benefits/Comments

A detailed inspection of the USGS topographic map reveals relatively consistent, moderately sloped terrain, with elevation within the Project ranging from a high of 1,836 ft above sea level to a low of 1,787 ft above sea level. The Project is located entirely within the Uplands and Valleys of Mixed Land Use Level IV ecoregion. According to the NLCD, the Project area largely consists of cultivated cropland, deciduous forest, and developed, open space.

The route will have a 100 ft ROW width. The proposed ROW will be greenfield.

See Attachment 4 (Google Earth .kmz file) for crossing locations.

See Attachment 5 (Crossing Plan) and Attachment 4 (Google Earth .kmz file).

Environmental constraints were evaluated within the vicinity of the proposed project route and are manageable through avoidance, minimization, and mitigation strategies incorporated at the onset of the routing/siting process. The proposed route crosses numerous aquatic resources, including wetlands, lakes/ponds, and streams but most features could be spanned & avoided with minimal impacts. According to FEMA, one 100-year floodplain is crossed by the route. This represents total amount of features crossed by the route & impacts from the Project would be significantly less. No major watercourses are crossed by the Project which would require agency authorizations for navigable water or State Scenic River crossings. No fatal flaws have been identified for the Project. No previously recorded archaeological sites, cemeteries, & architectural resources were recorded within the route. Also, no historic districts are crossed by the proposed route. Three federally listed species (2 endangered and 1 proposed) have known ranges along the proposed route. No critical habitat for any federally listed species intersects the route. If suitable habitat is identified or regulations change, agency coordination & species-specific surveys will occur. The project intends to follow suggested tree removal windows & general time of year restrictions to avoid/minimize impacts to species such as federally listed bats and migratory birds, among others. Industry standard construction BMPs & avoidance and minimization measures will be used to prevent unanticipated impacts to natural resources to the maximum extent practicable. There are no environmental concerns with the proposed project that cannot be addressed through agency coordination, mitigation, & an in-depth routing/siting process. No 'Major Federal Action' that would invoke NEPA is anticipated to result from the proposed route. See Attachment 8 – Permitting Plan.

The proposed structures will be single circuit 138kV steel monopole in a vertical conductor configuration utilizing braced post insulators or 138kV steel 3-Pole dead ends in horizontal conductor configuration for the transmission crossing. All structures will be self-supporting. See structure drawing set included in Attachment 10.

Company Specific Information

Company Specific Information

Engineering & design Company Specific Information

Permitting / routing / siting Company Specific Information

ROW / land acquisition Company Specific Information

Materials & equipment Company Specific Information

Construction & commissioning Company Specific Information

Construction management Company Specific Information

Overheads & miscellaneous costs Company Specific Information

Contingency Company Specific Information

Total component cost \$5,573,578.00

Component cost (in-service year) \$6,305,991.00

**Greenfield Transmission Line Component** 

Component title 01-106J - Brandonville/01-106J - Albringht #2 138kV

Project description Company Specific Information

Point A Brandonville

Point B 01-106J

Point C Albringht

Normal ratings Emergency ratings

Summer (MVA) 1025.000000 1056.000000

Winter (MVA) 1102.000000 1129.000000

Conductor size and type 2 bundled 1272 KCMIL ACSS/MA3 54/19 Pheasant

Nominal voltage AC

Nominal voltage

Line construction type

General route description

Terrain description

Right-of-way width by segment

Electrical transmission infrastructure crossings

Civil infrastructure/major waterway facility crossing plan

Environmental impacts

Tower characteristics

138

Overhead

The approximately 2-mile route parallels the Hazelton to Lake Lynn 138 kV.

A detailed inspection of the USGS topographic map reveals relatively consistent, moderately sloped terrain, with elevation within the Project ranging from a high of 1,939 ft above sea level to a low of 1,521 ft above sea level. The Project is located entirely within the Uplands and Valleys of Mixed Land Use Level IV ecoregion. According to the NLCD, the Project area largely consists of cultivated cropland, deciduous forest, and developed, open space.

The route will have a 100 ft ROW width. The proposed ROW will be greenfield.

See Attachment 4 (Google Earth .kmz file) for crossing locations.

See Attachment 5 (Crossing Plan) and Attachment 4 (Google Earth .kmz file).

Environmental constraints were evaluated within the vicinity of the proposed project route and are manageable through avoidance, minimization, and mitigation strategies incorporated at the onset of the routing/siting process. The proposed route crosses one aquatic resource, including wetlands, lakes/ponds, and streams but the identified feature could be spanned & avoided with minimal impacts. According to FEMA, one 100-year floodplain is crossed by the route. This represent total amount of features crossed by the route & impacts from the Project would be significantly less. No major watercourses are crossed by the Project which would require agency authorizations for navigable water or State Scenic River crossings. No fatal flaws have been identified for the Project. No previously recorded archaeological sites, cemeteries, & architectural resources were recorded within the vicinity of the route. Also, no historic districts are crossed by the proposed route. Three federally listed species (2 endangered and 1 proposed) have known ranges along the proposed route. No critical habitat for any federally listed species intersects the route. If suitable habitat is identified or regulations change, agency coordination & species-specific surveys will occur. The project intends to follow suggested tree removal windows & general time of year restrictions to avoid/minimize impacts to species such as federally listed bats and migratory birds, among others. Industry standard construction BMPs & avoidance and minimization measures will be used to prevent unanticipated impacts to natural resources to the maximum extent practicable. There are no environmental concerns with the proposed project that cannot be addressed through agency coordination, mitigation, & an in-depth routing/siting process. No 'Major Federal Action' that would invoke NEPA is anticipated to result from the proposed route. See Attachment 8 – Permitting Plan.

The proposed structures will be single circuit 138kV steel monopole in a vertical conductor configuration utilizing braced post insulators. All structures will be self-supporting. See structure drawing set included in Attachment 10.

Construction responsibility

Company Specific Information

Benefits/Comments

Company Specific Information

Component Cost Details - In Current Year \$

Engineering & design

Company Specific Information

Permitting / routing / siting

Company Specific Information

ROW / land acquisition

Company Specific Information

Materials & equipment

Company Specific Information

Construction & commissioning

Company Specific Information

Construction management

Company Specific Information

Overheads & miscellaneous costs

Company Specific Information

Contingency

Company Specific Information

Total component cost

\$12,272,072.00

Component cost (in-service year)

\$13,884,722.00

**Congestion Drivers** 

None

**Existing Flowgates** 

None

**New Flowgates** 

Company Specific Information

## Financial Information

Capital spend start date 01/2026

Construction start date 01/2030

Project Duration (In Months) 71

# **Additional Comments**

None