Bartletts Ferry Hydro Applying ILP Lessons Learned



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Bartletts Ferry Hydro •River mile: 177.9 •Capacity: 173 MW (6 units) •Operation: modified ROR •Surface area: 5,850 acres •Shoreline: 156 miles •License expires: Dec 14, 2014 Lake Harding Bartletts Ferry Dam East Powerhouse (Units 5 & 6) West Powerhouse (Units 1 - 4) CH2MHIL **Goat Rock** Lake



Large Corps reservoirs in the ACF Basin drive Bartletts Ferry operations

- Corps reservoirs comprise 96% of total usable storage on the Chattahoochee River
- Bartletts Ferry contains only 3.4% of the total usable storage
- West Point Dam controls 85% of the project inflow
- West Point releases vary from 600-800 cfs minimum flow to 18,000 cfs peaking flow



Downstream

- Middle Chattahoochee Project extends 15.4 river miles downstream to Columbus
- New license establishes minimum flow targets
- Corps dams impound lower
 160 miles of Chattahoochee
 River to Florida line



Potential Resource Issues

Water Quality & Flow



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SHOAL BASS OF ALABAMA: From Prolific to Protected

Fisheries



Shoreline Management









Key relicensing challenges

- Engaging a diverse group of interstate stakeholders
- Educating stakeholders early regarding project operations
- Building a technically strong project record
- Minimizing costs & risks of resource studies while managing stakeholder expectations
- Insulating NEPA scoping and study plan development from interstate issues lacking any direct nexus with the project
- Achieving reasonable operating terms and conditions that preserve power benefits and flexibility of project operations



ILP Lessons Learned

- Communicate early and often with stakeholders to elicit resource management goals and objectives, and existing information
- Take time to educate stakeholders on project operations
- Prepare PAD as foundation for applying study criteria in Study Plan
- Apply sound science to support successful agreements

| Study Criteria Applied in Director's Determinations for Morgan Falls | | |
|--|-----------------------|------------------------------|
| Study Criteria | Dispute Resolution | Additional Study Requests |
| § 5.9(b)(2) – Relevant resource management goals | Х | |
| § 5.9(b)(4) – Existing information | Х | Х |
| § 5.9(b)(5) – Nexus between project operations & effects | Х | Х |
| § 5.9(b)(7) – Level of effort & costs | | Х |



Strategies for advancing stakeholder trust

- Establish a user-friendly website from the outset
- Prepare and distribute an Operations Primer
- Hold a workshop on the Operations Primer and ILP
- Distribute a PAD questionnaire to facilitate input
- Engage stakeholders in early discussions
- Offer multiple days of Study Plan meetings & PLP meetings



The PAD sets the stage for Study Plan development

- Be diligent in gathering relevant existing information
- Effective data presentation helps establish adequacy of existing information for analyzing resource issues
- Address all PAD content requirements
- Detailed study outlines narrow issues and build trust
 - Better focus stakeholder comments and study requests
 - Relieve stakeholders from writing their own study requests
 - Enhance efficiency in filing Proposed Study Plan



Sound-science approach facilitates stakeholder consensus and FERC acceptance

- Requires building a strong technical project record
- Strengthens effective use of ILP study criteria
- Supports informal resolution of study disagreements
- Strengthens position in formal study dispute resolution
- Moves bar higher for study plan modifications (good cause) and new study requests (extraordinary circumstances)
- Improves prospects in EPAct trial-type hearing
- Facilitates reaching more favorable agreements



ILP Principles

- Communicate early and often with stakeholders and FERC
- The PAD is the foundation for study plan development
- Define and narrow the nexus
- Maximize the use of relevant existing information
- Manage study plan development to the study criteria
- Build a strong technical record throughout the proceeding
- Document, explain, and justify each step of the way
- Sound science facilitates resolution of difficult issues

