



June 27, 2012

Mr. William H. Allerton, P.E.
Director, Division of Dam Safety and Inspections
FEDERAL ENERGY REGULATORY COMMISSION
888 First Street, NE
Washington, DC 20426

Subject: Owner's Dam Safety Program
NHA's Hydraulic Power Committee Comments

Dear Mr. Allerton,

After receiving FERC's letter regarding the new requirement for licensees/ owners to submit their Owner's Dam Safety Program (ODSP) to FERC, several members of the National Hydropower Association's (NHA) Hydraulic Power Committee (HPC) expressed a desire to hold a conference call to discuss the new requirement. I wanted to pass on to you some of that discussion, comments and questions.

Most licensees have a robust dam safety program in place, but not all of them have the programs formalized into a written document. We believe that preparation and submission of a written ODSP will be beneficial in the long term to enhance dam safety.

We appreciate the guidance documents that FERC has provided, in particular enclosure A that came with the ODSP letter entitled "Outline for Owner's Dam Safety Program", and the FERC inspection checklist and self assessment evaluation parameters located on the FERC website. These documents are informative and will prove to be useful tools as we compare the features of our current dam safety plans against the plan features desired by FERC.

However, we were disappointed that FERC did not offer the members of NHA's HPC an opportunity in advance to review and comment on the ODSP requirement and schedule. In particular, this would have provided FERC with some useful input and advanced feedback on how the letter would be received. Our group is always available for FERC to bounce ideas off of.

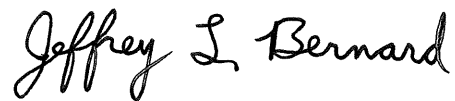
Some licensees discussed the benefit of a time extension to submit the ODSPs, mainly due to the coordination needed between several internal company departments and senior management. Therefore, we respectfully ask for an extension to submit final ODSPs to January 31, 2013.

Confidentiality of the submitted plans is also important to us and was discussed at length. Therefore, we respectfully ask what FERC's procedure and plan is to ensure that each ODSP submitted is secure and confidential, and whether the ODSPs will be designated as critical energy infrastructure information (CEII)?

Please consider the above points and let me know if you have any questions. As always, the NHA HPC remains available to the FERC to review documents, discuss concerns, or disseminate information to the licensee members.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey L. Bernard". The signature is written in a cursive style with a large, prominent "J" and "B".

Jeffrey L. Bernard
Chairman
NHA HPC Dam Safety Subcommittee

xc: NHA HPC