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Secretary of the Commission
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Engineering Guidelines for the Evaluation of Hydropower Projects: Chapter 15—Supporting
Technical Information Document

Submitted via eFiling

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Commissioners of the Federal Energy Regulatory Commission,

The National Hydropower Association (NHA) appreciates the opportunity to respond to the Federal Energy Regulatory Commission's (FERC) Chapter 15—Supporting Technical Information Document of its Engineering Guidelines for the Evaluation of Hydropower Projects draft for public comment. The association commends the Commission for its dedication to dam and public safety. These comments, which are organized by section within the guideline, provide suggested changes, request additional clarity and outline concerns from the industry. NHA requests that FERC take into consideration each comment before moving forward with finalizing the guideline.



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I. Introduction and General NHA Comments

The National Hydropower Association (NHA) is a national non-profit trade association dedicated exclusively to advancing the interests of the U.S. hydropower industry, including conventional, pumped storage, and new marine and hydrokinetic technologies. NHA’s membership consists of over 240 organizations, including consumer-owned utilities, investor-owned utilities, independent power producers, equipment manufacturers, environmental and engineering firms, and attorneys.

NHA commends FERC for exploring ways the D2SI program can be changed to further enhance the safety and stability of the nation’s non-federal hydropower dams. NHA recognizes the challenge FERC has been tasked with as well as the complexity involved in creating a process that better identifies ongoing issues across an industry of highly individualized projects. The Hydropower industry recognizes that certain infrastructure within the hydro fleet is aging and may warrant additional investment. NHA believes FERC’s goal of the Notice of Proposed Rulemaking (NOPR) and the guidelines are to help industry to identify where appropriate investments are needed. These comments include suggestions for improvement to Chapter 15—Supporting Technical Information Document to ensure that timely submittals of documentation and financial burden are considered when making changes to the D2SI program.

II. NHA Comments to Guideline Sections

a. 15-1.1 Purpose

NHA suggests the requirement for a hard copy be removed, as digital reference is already required and can be more easily updated as a “living” document.

b. 15-1.2 Applicability

The proposed guidance states “the Regional Engineer may request that the licensee prepare an STID for other projects (*not subject to 18 CFR Part 12D*) on a case-by-case basis.” This clause provides the Regional Engineer broad authority to require an STID for projects at their discretion. NHA request clarity as to how this authority will be implemented and if it will be implemented consistently across various Regions.

c. 15-2.3 STID Digital Reference

Regarding the requirement to provide the media in a sleeve or case, NHA recommends FERC approve the use of secured share drives as an option. As cyber security becomes a large driver for discontinuing the use of external thumb drives and other media to protect company assets, the industry and FERC should revisit this requirement. The secured shared drive alternative would allow for a secure sharing of the digital copy and would allow for a more living document approach to updating the information.



d. 15-2.4 Updating the STID

NHA recommends FERC provide more than 60 days following the submittal of the comprehensive assessment report (CAR) so that the recommendations of the IC can be incorporated within the update.

With all the company resources deployed toward the CAR, this could create a hardship for resources to complete the submittal within 60 days. NHA requests FERC clarify or answer the following:

- i. Clarification on FERC's approval timeline of submitted documentation between inspections.
- ii. Periodic Inspection: "Prior to a PI, the licensee must provide any STID updates to the current Part 12D IC, the FERC, and to other document holders for review prior to the IC's inspection." If any updates are required, is there a required time frame the STID updates must be submitted before the PI activities begin?
- iii. Other Updates: "As analyses or studies are completed between CAs, after they have been accepted by the FERC, update the corresponding sections of the STID accordingly and provide the updates to the FERC." Are companies not required to update the STID's prior to FERC approval of the documents, as approval of documents can take several years?

e. 15-3.4 Standard Operating Procedures

NHA suggests a reference to the location of the procedures as to not duplicate efforts. This requirement is repetitive to the DSSMP and EAP.

f. 15-3.6.1 Hydrology

NHA requests that in order to satisfy this requirement the licensee could use the top five floods in the systematic hydrologic records. This is requested since data prior to formal gauging programs may be unavailable, inaccurate and challenging to provide.

g. 15-3.6.2 Hydraulics – Dams

Regarding the "Project Discharge Rating Curve", NHA requests that FERC clarify the layout and structure of the information requested.

h. 15.3.8.1 Summary of Results

NHA is concerned with the redundancy involved in providing a summary of all results for each water retaining structure at the beginning of Section 8 and then providing it again in subsequent subsections. In addition, it will be difficult to provide definitive results and may prove to be misleading.

NHA requests additional clarity of the requirement, as it is unclear which set of analyses should be included in this summary. Some projects have initiated risk-based approaches to analyses that do not



provide a single factor of safety. As the industry continues to transition to a risk-based approach, reporting factor of safety for deterministic analyses will become less common.

i. 15-3.8.8 Spillway Piers

NHA requests FERC clarify if this section will require stress analyses studies on each individual pier or for typical sections.

j. 15-3.10 Pertinent Correspondence Related to the Safety of Projects Works

NHA recommends FERC remove the requirement that a licensee submit two printed lists of pertinent correspondence between FERC and the licensee. E-filing documents to the e-library makes it easier to track and retrieve reports quickly.

k. Additional Comments

There is no guidance on how to incorporate analyses that have been completed, but are not yet approved by FERC. It can take years for some studies to be approved due to comments from FERC and revisions. It is assumed that an STID should not be updated until FERC officially approves them and they are accepted as the record analyses.

The new guidelines provide a more comprehensive outline for the STID and more specificity for what should be included within various sections. It is anticipated that significant updates, revisions, and additions will be required for most projects to meet the new guidelines. The level of effort to locate, organize, summarize and include this data in the hard copy and digital STID should not be underestimated.

III. Conclusion

Once again, NHA appreciates the opportunity to comment on Chapter 15 – Supporting Technical Information Document of the Engineering Guidelines for the Evaluation of Projects. NHA commends FERC for exploring ways the D2SI program can be changed to further enhance the safety and stability of the nation’s non-federal hydropower dams. We hope FERC considers the areas of agreement, identified challenges and alternatives presented within our response to the guideline.

NHA appreciates the opportunity to provide these comments and discuss this important public safety topic.