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Dominion Energy South Carolina, Inc.
DESC Power Generation
220 Operation Way, MC B223, Cayce SC 29033
DominionEnergySC.com



June 28, 2024

Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
ATTN: OEP/Division of Hydropower Administration and Compliance
888 First Street, N. E.
Washington, D. C. 20426

Subject: Dominion Energy South Carolina, Inc.
Saluda Hydroelectric Project, FERC Project No. 516
License Article 31 Annual Report

Dear Secretary Reese:

Dominion Energy South Carolina, Inc. (DESC), Licensee for the Saluda Hydroelectric Project, FERC Project No. 516, hereby files electronically for Commission approval the 2023 Annual Operations Report and proposed Guidelines for Operation of the Saluda Project for Dissolved Oxygen Management in 2024. As required by the provisions of Article 31, DESC has developed the Guidelines in cooperation with the federal and state resource and regulatory agencies named in the Article as well as American Rivers. Correspondence is included in Attachment 1 and a copy of the May 21, 2024 meeting notes with the federal and state resource and regulatory agencies is included in Attachment 2. Comments to the report were received from SC Department of Health and Environmental Control and the SC Department of Natural Resources during the meeting. All comments were incorporated into the report. No other comments to the report were received.

Should the Commission or its Staff have any questions concerning the proposed Guidelines, please contact the undersigned at (803) 217-7322 or raymond.ammarell@dominionenergy.com.

Sincerely,

A handwritten signature in blue ink that reads "Raymond R. Ammarell".

Raymond R. Ammarell, P.E., Manager
Dam Safety and Civil Engineering
DESC Power Generation

Page 2
Saluda Hydroelectric Project P-516
License Article 31, Annual Report
Debbie-Anne A. Reese

AIB/ab

Enclosures

c: I. N. Griffin/J. W. Miller/H. E. Delk, Jr./SH File/Corporate Records
J.E. Brown, Jr./O. Brown
W. Wenerick - SCDHEC
G. Jobsis/P. Raabe – American Rivers
M. Olds – USFWS
E. Miller - SCDNR
K. Mack – NMFS
E. Cedzo/T. Allred – SCCCL

ATTACHMENT 1

CORRESPONDANCE

From: Amy Bresnahan (DESC Generation - 8)

Sent: Monday, April 22, 2024 12:36 PM

To: Gerrit Jobsis <gjobsis@americanrivers.org>; MillerE@dnr.sc.gov; Kevin Mack <kevin.mack@noaa.gov>; fritz.rohde <fritz.rohde@noaa.gov>; Pace Wilber (Pace.Wilber@noaa.gov) <pace.wilber@noaa.gov>; Melanie Olds <melanie_old@fws.gov>; Eddy Moore; Chuck Hightower (hightocw@dhec.sc.gov) <HIGHTOCW@dhec.sc.gov>; Jason Bettinger <bettingerj@dnr.sc.gov>; Rabon, Bryan <raboneb@dhec.sc.gov>; Craig E Pearson (DESC Generation - 8) <Craig.E.Pearson@dominionenergy.com>; praabe@americanrivers.org; Wenerick, William "Rusty" <weneriwr@dhec.sc.gov>; Milton Quattlebaum (DESC Generation - 8) <MILTON.QUATTLEBAUM@dominionenergy.com>; Congaree Riverkeeper <crk@congareriverkeeper.org>

Cc: Henry Delk (DESC Generation - 8) <HENRY.DELK@dominionenergy.com>; James Miller (DESC Generation - 8) <james.miller@dominionenergy.com>; Raymond Ammarell (DESC Generation - 8) <RAYMOND.AMMARELL@dominionenergy.com>; Orville Owen (DESC Generation - 8) <ORVILLE.OWEN@dominionenergy.com>; Caleb Gaston (Services - 6) <caleb.gaston@dominionenergy.com>; Paul Vidonic (Services - 6) <paul.vidonic@dominionenergy.com>; Andy Sawyer <andy@remiwq.com>

Subject: Saluda Project Article 31 draft report and meeting request

All,

Please find the attached draft 2023 Operations Report per Saluda Project Article 31 for your agency's review to discuss at the annual Saluda Hydro Article 31 meeting. If you have any questions/comments you would like to submit prior to the meeting, please let me know so that we can address them in the meeting.

Below is a link to a poll to schedule the meeting via MS Team towards the end of May.

<https://rally.co/invite/XNwM8e9Zwesa>

Amy Bresnahan, P.E.

Power Generation, Civil Engineering
Dominion Energy South Carolina

601 Old Taylor Road, Cayce, SC 29033

Mailing Address: 220 Operation Way, MC B223, Cayce, SC 29033

O: (803)217-9965 C: (803)206-4667



From: Amy Bresnahan (DESC Generation - 8)
Sent: Monday, April 22, 2024 12:52 PM
To: 'emilyc@sccl.org' <emilyc@sccl.org>
Subject: FW: Saluda Project Article 31 draft report and meeting request

Emily – please see the email below and the attached document per Article 31 of the Saluda Project FERC license.

From: Amy Bresnahan (DESC Generation - 8)
Sent: Monday, April 22, 2024 12:36 PM
To: Gerrit Jobsis <gjobsis@americanrivers.org>; MillerE@dnr.sc.gov; Kevin Mack <kevin.mack@noaa.gov>; fritz.rohde <fritz.rohde@noaa.gov>; Pace Wilber (Pace.Wilber@noaa.gov) <pace.wilber@noaa.gov>; Melanie Olds <melanie_olds@fws.gov>; Eddy Moore; Chuck Hightower (hightocw@dhec.sc.gov) <HIGHTOCW@dhec.sc.gov>; Jason Bettinger <bettingerj@dnr.sc.gov>; Rabon, Bryan <raboneb@dhec.sc.gov>; Craig E Pearson (DESC Generation - 8) <Craig.E.Pearson@dominionenergy.com>; praabe@americanrivers.org; Wenerick, William "Rusty" <weneriwr@dhec.sc.gov>; Milton Quattlebaum (DESC Generation - 8) <MILTON.QUATTLEBAUM@dominionenergy.com>; Congaree Riverkeeper <crk@congareriverkeeper.org>
Cc: Henry Delk (DESC Generation - 8) <HENRY.DELK@dominionenergy.com>; James Miller (DESC Generation - 8) <james.miller@dominionenergy.com>; Raymond Ammarell (DESC Generation - 8) <RAYMOND.AMMARELL@dominionenergy.com>; Orville Owen (DESC Generation - 8) <ORVILLE.OWEN@dominionenergy.com>; Caleb Gaston (Services - 6) <caleb.gaston@dominionenergy.com>; Paul Vidonic (Services - 6) <paul.vidonic@dominionenergy.com>; Andy Sawyer <andy@remiwq.com>
Subject: Saluda Project Article 31 draft report and meeting request

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<https://rally.co/invite/XNwM8e9Zwesa>

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From: Amy Bresnahan (DESC Generation - 8)
Sent: Monday, April 29, 2024 2:15 PM
To: 'Gerrit Jobsis'; 'MillerE@dnr.sc.gov'; 'Kevin Mack'; 'fritz.rohde'; 'Pace Wilber (Pace.Wilber@noaa.gov)'; 'Melanie Olds'; 'Chuck Hightower (hightocw@dhec.sc.gov)'; 'Jason Bettinger'; 'Rabon, Bryan'; 'praabe@americanrivers.org'; 'Wenerick, William "Rusty"'; 'Congaree Riverkeeper'; Andy Sawyer; Raymond Ammarell (DESC Generation - 8); Caleb Gaston (Services - 6); 'emilyc@sccl.org'
Cc: Craig E Pearson (DESC Generation - 8); Milton Quattlebaum (DESC Generation - 8); Henry Delk (DESC Generation - 8); James Miller (DESC Generation - 8); James Brown (DESC Generation - 8); David Tucker (DESC Generation - 8); Orville Owen (DESC Generation - 8); Paul R Stewart (DESC Generation - 8); Paul Vidonic (Services - 6)
Subject: Saluda Hydro Project Article 31 annual meeting
When: Tuesday, May 21, 2024 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

All,
Please find the attached draft 2023 Operations Report per Saluda Project Article 31 for your agency's review to discuss at the annual Saluda Hydro Article 31 meeting. If you have any questions/comments you would like to submit prior to the meeting, please let me know so that we can address them in the meeting.

Amy Bresnahan
DESC Power Generation
(803)217-9965 office
(803)206-4667 cell

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 259 893 179 379

Passcode: SXrsvG

Dial-in by phone

[+1 804-215-0848,141607666#](#) United States, Richmond

[Find a local number](#)

Phone conference ID: 141 607 666#

Join on a video conferencing device

Tenant key: dominionenergy@m.webex.com

Video ID: 115 730 636 3

[More info](#)

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

From: William "Rusty" R. Wenerick <WENERIWR@dhec.sc.gov>
Sent: Friday, June 7, 2024 9:17 AM
To: Amy Bresnahan (DESC Generation - 8) <amy.bresnahan@dominionenergy.com>
Cc: Raymond Ammarell (DESC Generation - 8)
<RAYMOND.AMMARELL@dominionenergy.com>
Subject: [EXTERNAL] Re: Saluda Article 31 meeting comment

That makes sense - thanks.

William R. "Rusty" Wenerick
Project Manager
Water Quality Certification & Wetlands Program
S.C. Dept. of Health & Environmental Control
Environmental Affairs
Bureau of Water
Division of Water Quality
2600 Bull Street
Columbia, SC 29201-1708
Office: (803) 898-4266
Fax: (803) 898-7344
Connect: www.scdhec.gov [scdhec.gov] [Facebook](https://www.facebook.com) [[facebook.com](https://www.facebook.com)] [Twitter](https://twitter.com) [twitter.com]

From: AMY BRESNAHAN <amy.bresnahan@dominionenergy.com>
Sent: Friday, June 7, 2024 8:59 AM
To: William "Rusty" R. Wenerick <WENERIWR@dhec.sc.gov>
Cc: RAYMOND AMMARELL <RAYMOND.AMMARELL@dominionenergy.com>
Subject: Saluda Article 31 meeting comment

Rusty,
In the meeting you stated there were some references on page A-3 that you would like included. After some digging on what that reference is, it appears to be a holdover from the early years when they were having issues with the USGS gage as noted in Section 4.0. The river gage near the plant has since been relocated to the middle of the river for better data collection and less fouling of the instruments. As such we decided to remove the last sentence of that footnote however the remainder of the footnote is still valid as there can be data issues associated with the gages but much more infrequent.

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From: Amy Bresnahan (DESC Generation - 8)
Sent: Friday, June 7, 2024 9:46 AM
To: 'Gerrit Jobsis' <gjobsis@americanrivers.org>; 'MillerE@dnr.sc.gov' <millere@dnr.sc.gov>; 'Kevin Mack' <kevin.mack@noaa.gov>; 'fritz.rohde' <fritz.rohde@noaa.gov>; 'Pace Wilber (Pace.Wilber@noaa.gov)' <pace.wilber@noaa.gov>; 'Melanie Olds' <melanie_olds@fws.gov>; 'Chuck Hightower (hightocw@dhec.sc.gov)' <HIGHTOCW@dhec.sc.gov>; 'Jason Bettinger' <bettingerj@dnr.sc.gov>; 'Rabon, Bryan' <raboneb@dhec.sc.gov>; 'praabe@americanrivers.org' <praabe@americanrivers.org>; 'Wenerick, William "Rusty"' <weneriwr@dhec.sc.gov>; 'Congaree Riverkeeper' <crk@congareriverkeeper.org>; Andy Sawyer <andy@remiwq.com>; Raymond Ammarell (DESC Generation - 8) <RAYMOND.AMMARELL@dominionenergy.com>; Caleb Gaston (Services - 6) <caleb.gaston@dominionenergy.com>; 'emilyc@sccl.org' <emilyc@sccl.org>; Jennifer Gut <Jennifer.Gut@KleinschmidtGroup.com>; Alison Jakupca <Alison.Jakupca@KleinschmidtGroup.com>
Cc: Craig E Pearson (DESC Generation - 8) <Craig.E.Pearson@dominionenergy.com>; Milton Quattlebaum (DESC Generation - 8) <MILTON.QUATTLEBAUM@dominionenergy.com>; Henry Delk (DESC Generation - 8) <HENRY.DELK@dominionenergy.com>; James Miller (DESC Generation - 8) <james.miller@dominionenergy.com>; James Brown (DESC Generation - 8) <JAMES.E.BROWN@dominionenergy.com>; David Tucker (DESC Generation - 8) <DAVID.TUCKER@dominionenergy.com>; Orville Owen (DESC Generation - 8) <ORVILLE.OWEN@dominionenergy.com>; Paul R Stewart (DESC Generation - 8) <paul.r.stewart@dominionenergy.com>; Paul Vidonic (Services - 6) <paul.vidonic@dominionenergy.com>; Taylor Allred <taylora@sccl.org>; Andrew Herndon - NOAA Federal <andrew.herndon@noaa.gov>; Ralana Wilson (DESC Generation - 8) <ralana.wilson@dominionenergy.com>
Subject: Saluda Hydro Project Article 31 annual meeting

All,

Attached are the draft meeting notes and the draft of the report in track changes mode so that you can see the edits that resulted from the meeting discussions. Please return any further comments to me by June 17, 2024 so that I may file the attached with the FERC by the end of the month.

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ATTACHMENT 2

MEETING NOTES

Article 31 Saluda Hydroelectric Project, P-516
2023 Operations Review Meeting
May 21, 2024



ATTENDEES:

Elizabeth Miller (SCDNR)
Jason Bettinger (SCDNR)
Fritz Rohde (NMFS)
Melanie Olds (USFWS)
Rusty Wenerick (SCDHEC)
Andy Sawyer (REMI)
Kevin Mack (NMFS)
Andy Herndon (NMFS)
Jennifer Gut (Kleinschmidt)
Ralana Wilson (DESC)

Bill Stangler (Congaree Riverkeeper)
Ray Ammarell (DESC)
Amy Bresnahan (DESC)
Caleb Gaston (DESC)
Paul Vidonic (DEV)
Jim Miller (DESC)
Milton Quattlebaum (DESC)
Randy Stewart (DESC)
Craig Pearson (DESC)
Gene Delk (DESC)

These notes serve to be a summary of the major points presented during the meeting and are not intended to be a transcript or analysis of the meeting.

SC Coastal Conservation League and America Rivers were invited to the meeting but did not attend.

Dominion Energy South Carolina, Inc. (DESC), Licensee for Saluda Hydroelectric Project, FERC Project No. 516 conducted this meeting via Microsoft Teams.

After introductions Andy Sawyer reviewed the updates to the draft of the 2023 Annual Report on Water Quality and Aeration Operations at the Saluda Project. First going over section 1.1, Overview of 2023 Aeration Operations, noting that the dissolved oxygen (DO) standard for the Lower Saluda River (LSR) was maintained during most of the period June through November. There were two periods when USGS 02168504 was less than the standard of 4 mg/L, June 21 – June 26 and November 15.

Andy reviewed the figures in section 2 explaining inflow to Lake Murray for the most part was a normal year with some high flow events that affected temperature and DO in the reservoir. The 2023 pool elevation declined quicker in the fall due to drought as the project operated to maintain downstream flow and DO levels throughout the low DO season which started in early June and ended in late-November. It was noted that the Saluda Hydro was called upon to meet the Company's reserve obligation during the low DO period on November 15th. In section 2.3 he reviewed the figures showing temperature and DO profiles that were collected in the forebay of Lake Murray during 2023. He noted that the bottom of the reservoir was warmer relative to other years most likely related to the higher flows through the Project in May and June which resulted in the DO declining sooner than usual relative to other years. This can also be seen in Figure 5, displaying the graph of the USGS data located in the forebay. Andy then reviewed the Figure 6 graph explaining the data from USGS gage 02168504 immediately downstream of the Saluda Hydro powerhouse and the USGS gage 02169000 further downstream.

Article 31 Saluda Hydroelectric Project, P-516
2023 Operations Review Meeting
May 21, 2024

In section 3.0 he discussed the details of the 2023 operations. The report explains that Units 1 – 4 have declined in DO uptake in recent years and the use of Unit 5 at low output to provide good DO uptake was used in combination with a smaller unit which discharges cooler water from the lower-level intakes. The DO excursions were explained with the first period that was for lake level management and the second period was for system reserve. Andy reviewed an email included in the report from Ray Ammarell dated November 16, 2023 to the agencies explaining the situation that occurred resulting in the November excursion of DO. He then discussed the graphs detailing the periods when DO excursions occurred and the summary of excursions at each of the USGS gages on the LSR and reviewed numbers 2 and 3 in the Recommendations for 2024.

Elizabeth Miller recommended 3 and 4 in the Recommendations for 2024 may be a bit confusing in the way they are worded related to the use of Unit 5. Ray explained how Unit 5 was used in 2023 and will probably be the same for 2024 and agreed that 3 and 4 were kind of conflicting. It was agreed to switch the order around and reference cubic feet per second (CFS) relative to megawatts (MW) which are referenced.

Ray gave an update on Unit 3 which involved replacement of the nose cone and hub baffles and also checked venting ports and the runner to make sure there were no obstructions. It appears that the air passages are all clear, yet we do not understand why the unit did not improve more with aeration, but it is doing better than Unit 4. DESC is finalizing a contract for new runners for units 1 and 3. It's estimated to be 2027 before installation and ready to run. The plan is to do units 1 and 3 first to keep unit 5 available to help with aeration during low DO seasons. Ray showed a photo of what the runners may look like and explained how they would work.

Elizabeth asked how this water quality meeting would evolve after the new license is issued as this is focused on the LSR and the NOAA Biological Opinion is more focused on the Congaree River. Ray was not sure but speculated that DESC may continue to have this meeting, yet it depends on what is in the new FERC license.

Elizabeth next inquired about the new Lake Murray rule curve. She stated that DNR is open to discussion on it but would like to try to hybridize the two rule curves until the units are upgraded to get the DO relief downstream and start bringing the reservoir down earlier in the year, possibly August. It was discussed and Ray stated that DESC would be willing to discuss that option.

Rusty Wenerick clarified that the term "hourly standard" is not correct and that it is an instantaneous value of a minimum of 4 mg/L. The USGS gage provides data in 15-minute intervals and DESC will correct to show those values below the 4 mg/L instead of an hourly reading.

Rusty also mentioned a footnote on A-3 and requested referenced documents. Upon review of the footnote, DESC found that the last sentence referred to discussions that occurred in 2004 and 2006 during Article 31 meetings related to the USGS gages. Section 4.0 of the document discusses this therefore DESC has removed the last sentence from the current document.

No other discussions related to Article 31 were had so the meeting was adjourned.