

ATTACHMENT 3a  
FINAL SCHEDULE A RESPONSE

SCHEDULE A  
DEFICIENCIES  
SALUDA HYDROELECTRIC PROJECT FERC No. 516

1. Minimum Hydraulic Capacity of Units

On page B-1 of Exhibit B, section 1.0, you state that the power plant usually operates with one unit on line at a minimum gate opening to provide downstream flow in the Saluda River. Section 4.51(c) requires that you provide both the minimum and maximum hydraulic capacity of the power plant in cubic feet per second. Therefore, please specify the minimum and maximum flow passed by each unit and provide the minimum amount of flow that can be discharged without operational problems such as cavitation occurring.

**SCE&G Response:** Exhibit B, section 1.0 has been revised to state the minimum and maximum hydraulic capacity of each unit and the minimum amount of flow that can be discharged without operational problems such as cavitation occurring. In addition, Exhibit A-2 (Project Standard Numbers) has been revised to include the minimum hydraulic capacity of each unit. A new Exhibit A which includes the revised Exhibit A-2 is included as part of this response submittal electronic filing. A new Exhibit B (without Exhibits B-1 through B-30, which did not change) is included as part of this response submittal electronic filing.

2. Exhibit G maps

Section 4.51(h) of the Commission's regulations requires that Exhibit G drawings conform to section 4.39 and that the project boundary enclose all project works and other features (including existing and proposed recreation facilities) that are to be licensed. We reviewed the Exhibit G maps that you have provided for the Saluda Hydroelectric Project as part of the license application. First, the maps provided in Exhibit G are not fully legible (see road labels and text below legends) and should be replaced with legible copies. Second, we need additional information and detail to adequately assess issues related to land ownership within the project boundary including any easements or land conveyances. Also, clearly show and label any areas that are proposed to be added or deleted from the project boundary. Please provide the following information:

**SCE&G Response:** The image files for the Exhibit G map sheets included on the Volume I CD-ROM were low resolution scans which proved to be largely illegible on screen and when printed at 11x17 inch size. New image files of the full size (24x36 inches) maps, and revised Exhibit G introductory text are included as part of this response submittal electronic filing.

- a.) The current Exhibit G maps do not provide land ownership information for lands included within, or adjacent to, the project boundary. Section 4.51(h)(4) requires that you identify by legal subdivision any lands within the project boundary that are (a) owned in fee by the applicant and lands that the applicant plans to acquire, and (b) for situations where the applicant has or plans to acquire rights to occupancy and use other than fee simple, including rights acquired or to be acquired by easement or lease. Please provide the required information for the area currently included within the project boundary.

**SCE&G Response:** All lands within the project boundary are either owned in fee by SCE&G or have easement rights (flowage at a minimum) granted to SCE&G.

The Exhibit G maps have been revised to distinguish lands within the project boundary that are owned in fee by SCE&G from lands that have rights granted to SCE&G by easement. Certain properties have other rights granted in addition to flowage (i.e. clearing or mineral rights), however showing every existing combination of easement rights on the Exhibit G maps proved to be impractical. It should be noted that since 1984, the Licensee has conveyed fee interest in Project 516 property lying between the Project Boundary Line (PBL) and the 75-foot Setback Line and has retained flowage rights within that sales area. In these cases, the Licensee retained fee ownership between the 75-foot Setback Line and the maximum normal operating level (MNOL) adjacent to these areas, and these maps reflect this ownership pattern.

- b.) For any lands to be added to the project boundary (i.e., recreation lands, etc.), please identify the acreage; current ownership; current land rights to those lands, if any; and where necessary, the applicant's plans to acquire the lands in fee or through flowage rights, easement, or lease. Please also provide a schedule for any land acquisition and an estimate of any potential costs associated with the acquisition.

**SCE&G Response:** All properties which are proposed to be added to the project boundary are future recreation sites already owned in fee by SCE&G. They are shown on the Exhibit G maps with the acreage noted. These properties will be added to the project within two years of license issuance. This period of time is required to allow all of the proposed properties to be surveyed and included on the Exhibit E recreation drawings.

### 3. Project Boundary

According to 18 CFR §4.41(h), applicants are required to provide the project boundary data in a vector (or polygon) shape file and include bearings and distances from the fixed monuments (three known reference points). The geo-referenced electronic boundary data file must be positionally accurate to  $\pm 40$  feet to comply with National Map Accuracy Standards for maps at a 1:24,000 scale. The shape file must be accompanied by a separate text file describing the spatial reference for the geo-referenced data: map projection used (i.e., UTM, State Plane, Decimal Degrees, etc), the map datum (i.e., North American 27, North American 83, etc.), and the units of measurement (i.e., feet, meters, miles, etc.).

Please file a CD containing the geo-referenced project boundary data and include any revisions as requested throughout this additional information request. Please note that both Exhibits F and G data are to be provided on a CD. The exhibit drawings must also be viewable by a .PDF file or equivalent viewing software.

**SCE&G Response:** Project boundary shape files and spatial reference files are included as part of this response submittal electronic filing.

### 4. Cost of Proposed Measures

On page D-5 of Exhibit D, you state that the cost information (capital and annual costs) for each proposed environmental measure would be filed with a comprehensive settlement agreement for the project. Section 4.51(e) of the Commission's regulations requires that you provide the capital and operations and maintenance (O&M) cost of each proposed environmental measure.

Therefore, please provide the estimated capital and O&M cost of each proposed environmental measure along with any changes in annual generation (megawatt hours) that may be associated with each measure. You should include with these cost estimates (a) the cost of your proposed data recovery at the Tree House Site (38LX531); (b) a schedule and cost for survey of areas of archaeological sensitivity falling within South Carolina Electric & Gas Company-controlled property below the 360-foot contour line/maximum pool elevation as described in section 6.4 of your Historic Properties Management Plan (HPMP); and (c) costs associated with implementation of the HPMP.

**SCE&G Response:** In accordance with your request, SCE&G has revised Exhibit D of our final license application to include all of the estimated capital and O&M costs of the proposed measures as they are known at this time, including the cultural resource costs described in this item. As the final settlement agreement is still being negotiated, the costs presented are subject to change based on the final settlement agreement. The costs will be updated and included in the filing of the final agreement. Information regarding the estimated changes in annual project generation associated with the mitigation measures is also included in the revised Exhibit D, which is included as part of this response submittal electronic filing.