



# *Lower Saluda Scenic River Advisory Council*

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c/o South Carolina Department of Natural Resources  
1000 Assembly Street, Suite 354, Columbia, SC 29201 ~ 803/734-9096

October 21, 2005

To: Alan Stuart, Randy Mahan, and Bill Argentieri

From: Bill Marshall, Chairman

Subject: Comments on Operating Procedures for the Relicensing of the Saluda Hydroelectric Project, FERC Project 516

The Lower Saluda Scenic River Advisory Council has reviewed the Operating Procedures prepared by South Carolina Electric and Gas Company (SCE&G) for the relicensing of the Saluda Hydroelectric Project. We understand that the Operating Procedures have the intended purpose to establish structure for the relicensing process and provide guidelines to facilitate communications and cooperation among the various committees to promote an orderly, efficient and effective process. To support that purpose, we offer the following comments and recommendation for your consideration.

We recommend establishing a procedural group. Because the relicensing process will be complex, lengthy, and to some extent, evolving through time, we think it is essential that the Operating Procedures (which are general in nature) provide a means to address and resolve the details of procedural questions and problems in a timely, responsive, and consensus-based manner. It seems to us that a reasonable and constructive approach to addressing this need is to form a group that is representative of the process participants, and has the purpose of assisting SCE&G in resolving procedural/process issues. Formation of a procedural group is an idea being advocated by other participants in the Saluda hydro relicensing process and we support the concept.

A procedural group could provide SCE&G with more proactive input from agencies and stakeholder groups as the communication protocol is drafted. A procedural group could serve as the forum for participants of the relicensing process to resolve questions and problems and assist SCE&G in amending (improving) the process as it moves forward. Already there are questions and concerns being raised about choosing participants for technical committees, appropriate persons to act as facilitators, the number of absences allowed from RCG meetings, the timing of meetings to allow more public participation, communications with the media, and who can move issues in or out of the "parking lot." These are only a few examples of issues that a procedural group could assist SCE&G to resolve more effectively.

By establishing a procedural group, one that represents a cross-section of process participants, SCE&G can well serve its interest in conducting the relicensing process in a collaborative manner with stakeholders. Without such a group there appears to be minimal provision of procedure to facilitate effective communication and resolution of problems among participants within the general framework provided by the Operating Procedures.

Thank you for this opportunity to provide input and for your consideration of our recommendation. Please contact me at 803/734-9096 or by email at [marshallb@dnr.sc.gov](mailto:marshallb@dnr.sc.gov) if you have questions about comments from the Lower Saluda Scenic River Advisory Council.