

January 5, 2015

## **VIA E-FILING**

Kimberly Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

Subject: South Carolina Electric & Gas Company Parr Hydroelectric Project FERC Project No. 1894-SC Notice of Intent, Pre-Application Document, and Request to Use Traditional Licensing Process for the Parr Hydroelectric Project

Dear Secretary Bose:

South Carolina Electric & Gas Company (SCE&G), in accordance with the requirements of 18 CFR Sections 5 and 16, herein electronically files with the Federal Energy Regulatory Commission (Commission) the Notice of Intent (NOI) and Pre-Application Document (PAD) for the relicensing of the Parr Hydroelectric Project (Project) (FERC No. 1894). The current license, issued by the Commission to SCE&G on August 28, 1974, is set to expire on June 30, 2020.

The Project is located in Newberry and Fairfield counties, near the Town of Jenkinsville, South Carolina, on the Broad River. The Project includes the 14.88 MW Parr Shoals Development and the 511.2 MW Fairfield Pumped Storage Development. Parr Reservoir is a 4,400-acre impoundment formed by the Broad River and the Parr Shoals dam and serves as the lower reservoir for the Fairfield Pumped Storage Development. Monticello Reservoir is a 6,800-acre impoundment formed by a series of four earthen dams and serves as the upper reservoir for the pumped storage development.

Pursuant to 18 CFR §5.5(c) and §16.8, and by copy of this letter, SCE&G is also providing copies of the PAD to the relevant resource agencies, tribes, non-governmental organizations, and other potential interested parties included on the attached distribution list. Electronic copies on CDs are available at the Newberry County Library at 1100 Friend Street, Newberry, SC 29108 and the Fairfield County Library at 300 W. Washington Street, Winnsboro, SC 29180. Electronic copies of the filing will be available at the Project website at www.parrfairfieldrelicense.com.

SCE&G hereby requests Commission approval to use the Traditional Licensing Process (TLP) for the relicensing of the Parr Hydroelectric Project. Pursuant to 18 C.F.R. § 5.3(c)(1)(ii). SCE&G believes that use of the TLP will be in the best interest of the Commission and all

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parties in pursuing and achieving the goals of efficient, thorough, and fair consideration of all relicensing matters, to which:

- Likelihood of timely license issuance: SCE&G believes that using the TLP will provide local, state and federal agencies with manageable timeframes and assist FERC in achieving its goal of issuing a timely license for this Project.
- **Complexity of the resource issues and level of anticipated controversy:** During pre-PAD consultation with local, state and federal agencies and other interested stakeholders, SCE&G already has identified areas where additional information is needed on the existing environment surrounding the Project, and has, in consultative and cooperative fashion, begun the process of developing study plans and mechanisms for fulfilling study goals. Due to this extensive pre-PAD consultation, SCE&G does not anticipate a high level of complexity and controversy regarding resource issues during the relicensing process.
- **Relative cost of the traditional process compared to the integrated process:** The enhanced nature of the traditional process that SCE&G is proposing will result in numerous meetings and discussions. As such, SCE&G expects the costs to be similar between the TLP and the Integrated Licensing Process (ILP).
- The amount of available information and potential for significant disputes over studies: There is a wealth of information available on the existing environment in the vicinity of the Project, as presented in the PAD. SCE&G has implemented a substantive, robust pre-PAD consultation process which has enabled us to join with interested governmental and non-governmental parties in identifying information gaps. The success of these efforts greatly diminishes the potential for significant disputes over studies. Hence, SCE&G anticipates a low level of controversy and complexity relating to resource issues.
- Other factors believed by the applicant to be pertinent: SCE&G has recently completed TLP pre-filing consultation for the relicensing of the Saluda Hydroelectric Project (FERC No. 516) with most of the same resource agencies and NGOs and many of the same agency representatives have been involved in the pre-PAD consultation for the Parr Hydroelectric Project. The use of the TLP for the Saluda Hydroelectric Project relicensing resulted in the filing of a very robust settlement agreement. SCE&G expects to be able to implement a similar, successful pre-filing process at Parr through the use of the TLP. Given all of the factors discussed above, SCE&G strongly believes the TLP to be the most appropriate means to obtain a subsequent license for the hydroelectric project.

As was the case with the Saluda Project, SCE&G intends the proceedings to be a very open process with encouraged stakeholder's participation, following protocol and implementing measures that produce an Enhanced TLP.

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As provided in 18 C.F.R. § 5.3(d)(1), we note that comments on the request to use the TLP must be filed with the Commission within 30 days of this letter. Pursuant to 18 C.F.R. § 5.3(d)(2), SCE&G has published notice of the request to use the TLP in a daily newspaper of general circulation in the two counties in which the Project is located; the notice contains the information required by that section.

In accordance with 18 C.F.R § 5.5(e), the joint agency regulations at 50 CFR part 402, Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act, and the implementing regulations at 50 CFR 600.920, SCE&G hereby requests to be designated as the Commission's non-federal representative for the purposes of consultation under section 7 of the Endangered Species Act.

On May 17, 2013, SCE&G notified FERC that SCE&G began informal consultation with the South Carolina State Historic Preservation Officer as well as the Tribal Historic Preservation Officers for the Eastern Band of Cherokee Indians and the Catawba Indian Nation for the purposes of Phase I Cultural Resource Investigations. FERC notified SCE&G that this was acceptable and SCE&G completed Phase I investigations in consultation with the above listed agency and tribes in 2013. Nevertheless, for the purposes of the relicensing, SCE&G requests formal authorization from FERC under section 106 of the National Historic Preservation Act and to implement regulations at 36 CFR Section 8000.2(c)(4).

Should the Commission approve the use of the TLP, SCE&G proposes to host a joint agency and public meeting (JAM) of the Parr Hydroelectric Project in accordance with 18 CFR § 4.38 no earlier than 30 days, but no later than 60 days, from the Commission's TLP approval. The purpose of the meeting will be to provide opportunity for stakeholders to discuss information presented in the PAD and provide a virtual tour of the Project.

SCE&G is proposing to hold the JAM at the Lake Murray Training Center at 1888 North Lake Drive, Lexington, SC 29072 sometime during March or April 2015. The exact meeting date and location will be determined in consultation with jurisdictional agencies and interested licensing participants, subject to and following the Commission's approval of SCE&G's request to use the TLP process.

In addition to the parties listed in the Notice of Intent, copies of the Notice are also being sent to the South Carolina Public Service Commission and the Commission's Atlanta Regional Office.

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Please direct any questions pertaining to the Project or process to Mr. William Argentieri, Manager of Civil Engineering for SCE&G at (803) 217-9162 or <u>bargentieri@scana.com</u>.

Sincerely,

James M. Landreth, Vice President Fossil & Hydro Operations

WRA/wa

Attachments: Distribution List Notice of Intent Pre-Application Document

c: W. R. Argentieri/File
H. E. Delk, Jr.
J. K. Todd
J. C. Knight, Jr.
J. H. Hamilton, Jr.
Corporate Records
SC Public Service Commission
W. B. King – FERC ARO