

March 3, 2023

VIA ELECTRONIC FILING

Project No. 2628-066
R.L. Harris Hydroelectric Project
Water Quality Certification Application

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

Dear Secretary Bose,

Alabama Power Company (Alabama Power) is the Federal Energy Regulatory Commission (FERC or Commission) licensee for the R.L. Harris Hydroelectric Project (Harris Project) (FERC No. 2628-066). Alabama Power filed the Final License Application (FLA) for the Harris Project on November 23, 2021. On January 17, 2023, FERC issued a Ready for Environmental Analysis (REA), which included a requirement for Alabama Power to file one of the following within 60 days:

- A copy of the Water Quality Certificate (WQC); or
- A copy of the request for certification, including proof of the date on which the certifying agency received the request; or
- Evidence of waiver of water quality certification

Pursuant to Section 401 of the Clean Water Act, on February 28, 2022, Alabama Power held the mandatory pre-filing meeting with the certifying agency, the Alabama Department of Environmental Management (ADEM). On March 3, 2023, Alabama Power submitted the Harris Project's WQC application to ADEM. A copy of the WQC application is included in Attachment 1. Documentation that a pre-filing meeting request was submitted to ADEM at least 30 days prior to submitting the certification request and documentation providing proof of the date on which ADEM received the application request is included in Attachment 2.

The water quality certification application is available on the Harris Relicensing website at www.harrisrelicensing.com.

If there are any questions concerning this filing, please contact me at arsegars@southernco.com or 205-257-2251.

Sincerely,



Angie Anderegg
Harris Relicensing Project Manager

cc: Harris Stakeholder List

Attachment 1 – Application to the Alabama Department of Environmental Management for Water Quality Certification for the R.L. Harris Hydroelectric Project

Attachment 2 – Documentation of Pre-Filing Meeting Request and Application Submittal Date

Attachment 1

Application to the Alabama Department of Environmental Management for
Water Quality Certification for the R.L. Harris Hydroelectric Project

March 3, 2023

Project No. 2628-066
R.L. Harris Hydroelectric Project
Water Quality Certification Application

Mr. Chris Johnson
Chief of Water Quality Branch
1400 Coliseum Boulevard
Montgomery, AL 36110-2400

Dear Mr. Johnson,

Alabama Power Company (Alabama Power) is the Federal Energy Regulatory Commission (FERC or Commission) licensee for the R.L. Harris Hydroelectric Project (Harris Project) (FERC No. 2628-066). Alabama Power filed the Final License Application (FLA) for the Harris Project on November 23, 2021. On January 17, 2023, FERC issued a Ready for Environmental Analysis (REA), which included a requirement for Alabama Power to file one of the following within 60 days:

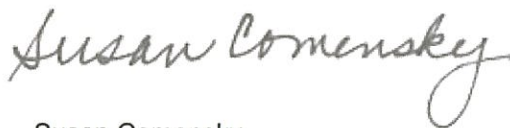
- A copy of the Water Quality Certificate (WQC); or
- A copy of the request for certification, including proof of the date on which the certifying agency received the request; or
- Evidence of waiver of water quality certification

Pursuant to Section 401 of the Clean Water Act (CWA), on February 28, 2022, Alabama Power held the mandatory pre-filing meeting with your office, the Alabama Department of Environmental Management (ADEM) who is the certifying agency. Alabama Power is now formally submitting the attached request for certification. Alabama Power hereby certifies that all information contained in Attachments 1 and 2 to this letter is true, accurate, and complete to the best of my knowledge and belief.

Alabama Power hereby requests that ADEM review and take action on this CWA 401 certification request within the applicable reasonable period of time.

If there are any questions concerning this filing, please contact Keith Chandler of my office at kechandl@southernco.com or 205-257-1091.

Sincerely,



Susan Comensky
Vice President of Environmental Affairs

**Application to the
Alabama Department of Environmental Management
For Water Quality Certification
For the R.L. Harris Hydroelectric Project**

Prepared by



Environmental Compliance
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291

TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	Location and Description of the Harris Project	2
2.0	EXISTING WATER QUALITY	5
2.1	Lake Harris	5
2.2	Tailrace Water Quality.....	6
3.0	MEASURES FOR PROTECTING AND IMPROVING WATER QUALITY	10
3.1	Existing Measures.....	10
3.2	Proposed Measures.....	10
3.3	National Pollution Discharge Elimination System Permits	12
3.4	Harris Water Quality Following License Issuance.....	12
4.0	CONCLUSION.....	14

LIST OF TABLES

Table 2-1	Summary of Dissolved Oxygen Measurements Collected in Harris Dam Forebay at a Depth of Five Feet.....	6
Table 2-2	Summary of Dissolved Oxygen and Water Temperature Monitoring Results in Harris Tailrace During Generation.....	8
Table 2-3	Summary of Tailrace Dissolved Oxygen Measurements Less Than 5 mg/L..	9
Table 3-1	Effects of Proposed Minimum Flow Unit on Compliance with the Dissolved Oxygen Standard.....	11
Table 3-2	Harris NPDES Discharges.....	12

LIST OF FIGURES

Figure 1-1	Alabama Power Monitoring Locations.....	4
------------	---	---

LIST OF APPENDICES

Appendix A

Water Quality Data

- Tailrace DO & Temp – 2017-2022
- DO & Temperature profiles in Forebay 2017 - 2021

1.0 INTRODUCTION

The Alabama Power Company (Applicant)¹ owns and operates the R.L. Harris Hydroelectric Project (Harris Project) on the Tallapoosa River in Alabama under license from the Federal Energy Regulatory Commission (FERC) (FERC No. 2628). Construction and operation of hydroelectric generating units on navigable waterways is subject to the jurisdiction of the FERC under the Federal Power Act. The Applicant has operated and maintained the Harris Project since 1983 under license from FERC.

The existing FERC license for the Harris Project will expire in November 2023. On November 23, 2021, Applicant filed an application to FERC for a new license for the continued operation of the Harris Project. Since 2017, Applicant has used FERC's Integrated Licensing Process (ILP) to develop the application for the Harris Project's new license. The ILP included a large number of stakeholders, including the Alabama Department of Environmental Management (ADEM), other state and federal agencies, various non-governmental organizations (NGO), and members of the public.

Section 401 of the Clean Water Act (CWA) requires that any applicant for a federal license to conduct any activity which may result in any discharge into the navigable waters provide to the licensing agency a certification from the state in which the discharge originates that the discharge will comply with state water quality standards adopted under the CWA. *See* 33. U.S.C § 1341 (a). EPA regulations implementing section 401 provide that "[i]f the certifying authority determines that a discharge from a proposed project will comply with water quality requirements, it may issue or waive certification." (40 C.F.R. § 121.7(b)).

In order to assist ADEM in issuing this certification, this application contains data collected by Applicant regarding the water quality at the Harris Project.

¹ Applicant is a public utility with its principal office in Birmingham, Alabama, engaged in the generation, transmission, distribution and sale of electricity. Applicant directly serves approximately 1.5 million customers in a service area of about 45,000 square miles (approximately 86 percent of Alabama's land area).

For purposes of developing this application for a Section 401 Water Quality Certification, per agreement with ADEM, Applicant conducted dissolved oxygen and water temperature monitoring in the tailrace at the monitor placed approximately 800 feet downstream of the Harris Dam on the west bank of the Tallapoosa River. Applicant also collected vertical profiles of dissolved oxygen and water temperature in the Lake Harris forebay in March through October each year from 2017 to 2022. Due to high flows at the end of the month when the profile was scheduled, Applicant was unable to collect vertical profile data in September 2017 (see Figure 1-1 for monitor locations).

In summary, this application demonstrates that the discharge from the Harris Project will comply with water quality requirements. Alabama's water quality criterion for DO applicable to the Harris Project provides:

(i) For a diversified warm water biota, including game fish, daily dissolved oxygen concentrations shall not be less than 5 mg/l at all times; except under extreme conditions due to natural causes, it may range between 5 mg/l and 4 mg/l, provided that the water quality is favorable in all other parameters. The normal seasonal and daily fluctuations shall be maintained above these levels. In no event shall the dissolved oxygen level be less than 4 mg/l due to discharges from existing hydroelectric generation impoundments. All new hydroelectric generation impoundments, including addition of new hydroelectric generation units to existing impoundments, shall be designed so that the discharge will contain at least 5 mg/l dissolved oxygen where practicable and technologically possible...

Ala. Admin. Code. r. 335-6-10-.09(2)(e)(4), (3)(c)(4), and (5)(e)(4).

1.1 Location and Description of the Harris Project

The Harris Project is an existing hydroelectric facility located on the Tallapoosa River in Clay, Cleburne, and Randolph Counties in Alabama. The dam and powerhouse are near the towns of Lineville and Wedowee in east central Alabama, at Tallapoosa River mile 139.1. The impoundment extends 29 miles upstream. At the normal pool elevation of 793.0 feet NGVD (National Geodetic Vertical Datum), the reservoir has a surface area of 9,870 acres and is surrounded by approximately 367 miles of shoreline.

The Harris Project includes an existing impoundment and two existing hydroelectric generation units. Water retaining structures total approximately 3,243 feet with a maximum height of 163 feet and consists of:

- 310-foot-long, 163-foot-high concrete gravity spillway;
- 186-foot-long, 150-foot-high concrete gravity intake structure;
- 400-foot-long and 95-foot-high west embankment;
- 600-foot-long and 95-foot-high east embankment;
- 331-foot-long, 112-foot-high concrete gravity west non-overflow section; and
- 315.5-foot-long, 150-foot-high concrete gravity east non-overflow section
- Earth embankments in topographic saddles east of the river:
 - 800-foot-long, 40-foot-high west saddle dike
 - 300-foot-long, 30-foot-high east saddle dike

The Harris Dam contains spillway gates for passing floodwaters in excess of turbine capacity. An outdoor powerhouse located on the west downstream side of the dam houses two vertical Francis turbines that each power 67.5 megawatt (MW) generator units for a total installed capacity of 135 MW.

In its license application, Applicant proposed to install, operate, and maintain a Francis-type minimum flow unit to provide a continuous minimum flow of approximately 300 cfs in the Tallapoosa River below Harris Dam. FERC is evaluating the Applicant's license proposal and will include operational requirements, such as a continuous minimum flow, in the new license. This final continuous minimum flow, based on peak unit efficiency with the aeration system in operation, would be determined following unit installation and performance testing. The final engineering design will consider the ability to provide a reliable flow, dam safety, and unit accessibility for operation and maintenance.

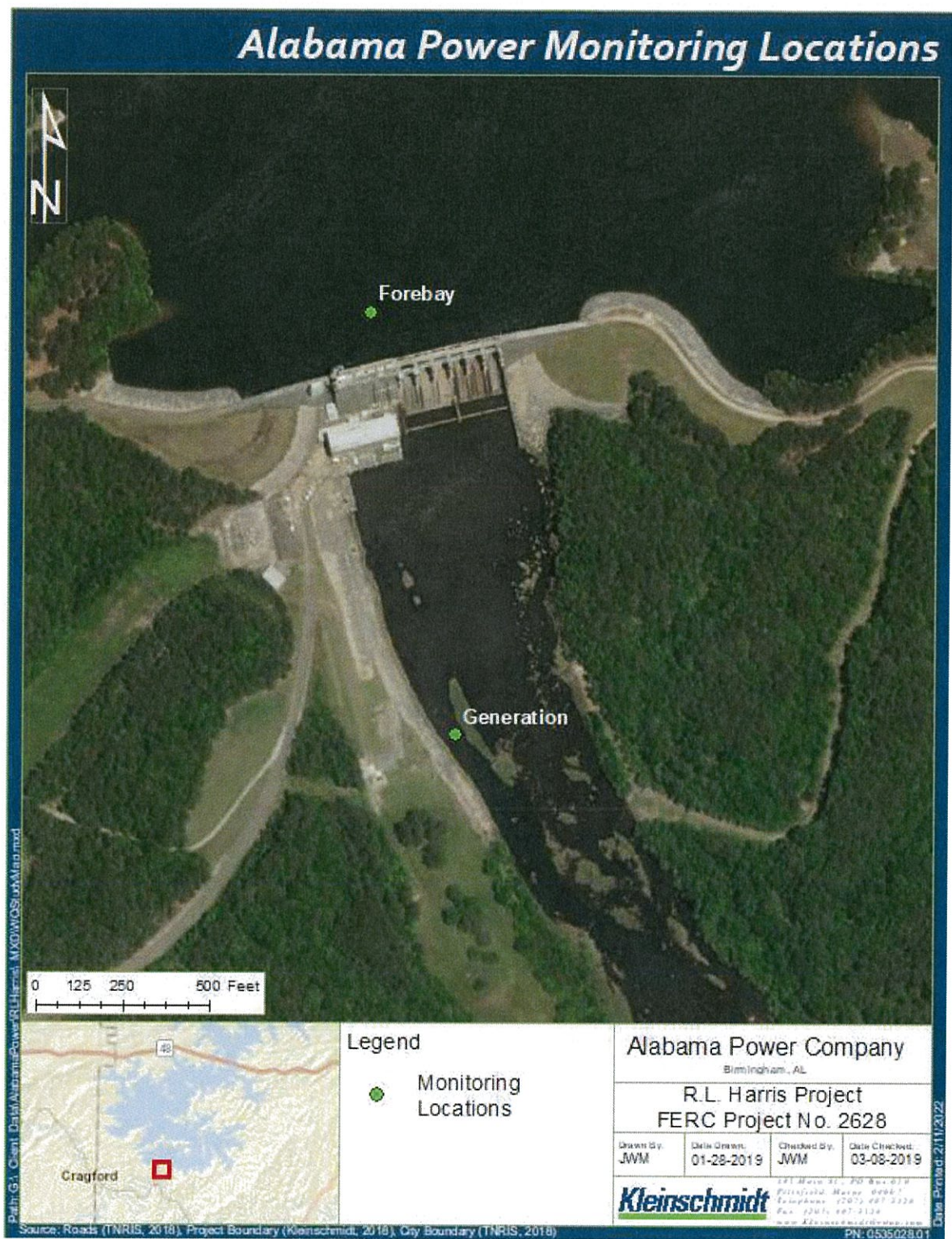


Figure 1-1 Alabama Power Monitoring Locations

2.0 EXISTING WATER QUALITY

As part of the relicensing process, Applicant prepared two documents which detail and summarize water quality at the Harris Project:

- Baseline Water Quality Report (Appendix L of the Pre-Application Document – June 2018)
- Water Quality Study Report (Filed with Final License Application – November 2021)

The Baseline Water Quality Report (Appendix L of the Pre-Application Document) summarized data collected by ADEM in Lake Harris² and the Tallapoosa River below Harris Dam between 2005 and 2016. The Water Quality Study Report (included with the final license application) summarized data collected by Applicant (2017 – 2021), ADEM (2018 – 2020), and Alabama Water Watch (1993 – 2019). These reports are available on FERC’s website at <https://elibrary.ferc.gov/> and on the Harris Relicensing website at <http://www.harrisrelicensing.com/>. In addition, generation data collected after finalization of the study reports is included with the entire generation dataset in Appendix A.

2.1 Lake Harris

The primary designations for best use of Lake Harris are for swimming and fish and wildlife (S/F&W) (ADEM Administrative Code r. 335-6-11-.02(11)). From Highway 431 to Wolf Creek, the Little Tallapoosa River has the additional classification of public water supply. Generally, during the spring and summer, the Harris Reservoir stratifies into three layers:

- an epilimnion, which is fairly uniform in temperature and is well oxygenated,
- a hypolimnion, a cold, less oxygenated bottom layer, and
- a metalimnion or thermocline, which is a transition layer between the epilimnion and hypolimnion.

² In this application, “Lake Harris” is synonymous with “reservoir”.

Harris Reservoir is typically stratified from June through October, with hypoxic/anoxic conditions at depths greater than 30 feet. However, in the summer months of some years, the reservoir may develop a negative heterograde dissolved oxygen profile, with oxygenated surface and bottom layers and a mid-depth layer with lower oxygen levels. Forebay profiles collected by the Applicant during March – October of 2017-2021 indicate dissolved oxygen levels at the 5 ft depth were always greater than 5 mg/L (Table 2-1). Forebay profile data is provided in Appendix A.

Table 2-1 Summary of Dissolved Oxygen Measurements Collected in Harris Dam Forebay at a Depth of Five Feet

Year	Average Dissolved Oxygen (mg/L)	Minimum Dissolved Oxygen (mg/L)	Maximum Dissolved Oxygen (mg/L)
2017	9.24	8.40	10.50
2018	8.82	6.08	11.64
2019	9.32	7.61	11.70
2020	8.56	7.42	9.49
2021	9.43	7.16	11.77

2.2 Tailrace Water Quality

The designated use classification for the Harris tailrace is fish and wildlife. For purposes of developing an application for a Section 401 WQC, and per agreement with ADEM, Applicant conducted dissolved oxygen and temperature monitoring in the tailrace approximately 800-feet downstream of the Harris Dam on the west bank of the river. Measurements were recorded at 15-minute intervals during generation from June to October of 2017 – 2022 (Appendix A).

Dissolved oxygen levels were consistently greater than 5 mg/L during the 2018, 2019, 2020, and 2022 monitoring periods and were typically lowest in August each year of the monitoring period (

Table 2-2). Dissolved oxygen levels in 2017 and 2021 were lower than those measured during the 2018, 2019, 2020, and 2022 monitoring periods. Water temperatures were typically lowest in June and October and highest in August and September during the monitoring period.

A summary of events where dissolved oxygen levels fell below the applicable standard of 5 mg/L is presented in **Table 2-3**. At the Generation Monitor, most of these events occurred in 2017 and 2021, with an average duration of 2.9 hours per event.

Table 2-2 Summary of Dissolved Oxygen and Water Temperature Monitoring Results in Harris Tailrace During Generation

Year/Month	Dissolved Oxygen (mg/L)			Water Temperature (°C)		
	Min	Avg	Max	Min	Avg	Max
2017						
Jun	2.58	4.94	8.32	18.65	21.04	25.77
Jul	3.64	4.98	8.44	21.14	23.52	28.80
Aug	3.47	4.61	7.59	23.88	24.84	28.13
Sep	3.48	5.74	8.11	21.60	23.17	26.30
Oct	4.33	5.74	8.46	17.50	21.38	24.73
2018						
Jun	5.34	6.82	9.90	19.09	21.19	24.85
Jul	4.69	5.92	8.53	22.44	23.92	29.35
Aug	4.22	5.21	7.01	23.67	24.34	27.65
Sep	4.51	5.52	7.12	24.14	24.94	26.95
Oct	5.04	6.02	10.52	19.16	22.94	26.23
2019						
Jun	4.82	6.22	8.72	19.31	21.33	25.33
Jul	5.42	6.11	8.64	22.25	23.66	25.75
Aug	4.22	5.71	8.06	23.35	24.42	26.58
Sep	5.23	6.47	8.54	23.95	24.95	26.81
Oct	4.85	6.35	9.90	19.14	21.20	26.71
2020						
Jun	5.52	6.53	8.69	19.57	21.23	22.89
Jul	5.24	5.95	7.70	21.98	23.51	25.37
Aug	4.57	5.87	7.91	23.73	24.68	25.72
Sep	4.77	6.16	8.80	21.91	23.92	26.17
Oct	4.61	5.96	9.12	19.49	21.09	23.54
2021						
Jun	4.37	5.40	8.00	19.22	21.24	24.09
Jul	3.86	4.74	8.69	22.16	23.53	25.55
Aug	2.98	4.68	8.31	23.98	25.05	26.76
Sep	3.69	4.73	9.04	23.70	24.65	26.63
Oct	3.63	5.08	9.81	20.02	22.73	25.14
2022						
Jun	5.83	6.34	8.81	19.85	21.78	25.02
Jul	4.64	5.75	10.17	22.31	23.90	27.12
Aug	4.44	5.43	7.46	23.98	24.95	27.70
Sep	4.47	5.53	7.98	21.53	24.66	27.42
Oct	6.24	6.89	8.50	17.58	20.38	23.27

Table 2-3 Summary of Tailrace Dissolved Oxygen Measurements Less Than 5 mg/L

Year/Month	# of Events	Avg Duration (hrs)
2017	145	3.1
Jun	24	7.2
Jul	43	2.3
Aug	57	2.5
Sep	17	1.3
Oct	4	2.8
2018	28	6.6
Aug	25	6.4
Sep	3	8.7
2019	2	0.4
Jun	1	0.5
Aug	1	0.3
2020	12	2.5
Jul	0	0.0
Aug	6	1.2
Sep	1	4.0
Oct	5	3.9
2021	203	2.9
Jun	14	2.6
Jul	54	3.4
Aug	54	2.8
Sep	59	2.1
Oct	22	4.5
2022	23	1.7
Jul	1	0.25
Aug	10	1.8
Sep	12	1.7

3.0 MEASURES FOR PROTECTING AND IMPROVING WATER QUALITY

3.1 Existing Measures

Applicant operates an aeration system, which was incorporated into the original turbine design, to provide up to 2 mg/L increase in dissolved oxygen. Prior to 2017, Applicant employed a surveillance program at Harris Dam to assess dissolved oxygen levels. In May of each year, Applicant would begin monitoring dissolved oxygen in the tailrace of the Harris Dam during generation every 2 weeks using a handheld instrument and the turbine aeration system was turned on when dissolved oxygen levels approached 5.5 mg/L. Beginning September 1 each year, Applicant would begin measuring dissolved oxygen in the Harris Dam tailrace every 2 weeks using a handheld instrument during generation. When dissolved oxygen levels were maintained at or above 6.0 mg/L, turbine aeration was turned off.

In 2017, a dissolved oxygen and temperature monitor was installed in the tailrace for purposes of gathering data during discharge for development of this application. Data from this monitor are now used to determine aeration system operation.

In addition, the Harris Dam intake structure includes a skimmer weir, which was designed to be raised or lowered to meet water quality needs. The skimmer weir was incorporated into the design to allow the intake to draw from different layers in the water column, providing for warmer releases with the added benefit of higher dissolved oxygen during periods of stratification. The weir has been in the uppermost position for the last 15-20 years drawing from relatively high in the water column. The invert elevation of the plant intake structure is located at 746.0-feet msl when the skimmer weir is fully lowered, and it is at 764.0-feet msl when it is fully raised.

3.2 Proposed Measures

In its license application, Applicant proposed to install, operate, and maintain a Francis-type minimum flow unit to provide a continuous minimum flow of

approximately 300 cubic feet per second (cfs) in the Tallapoosa River below Harris Dam. The proposed minimum flow unit includes a turbine aeration system. As part of a conceptual design, the ability of the proposed unit to meet the 5 mg/L DO criterion was assessed using a Discrete Bubble Model, a tool that was used during the initial unit design. The assessment concluded that the proposed unit would be able to provide discharges with DO concentrations of at least 5 mg/L.

Since the new unit would provide a discharge of at least 5 mg/L DO, it would result in a significant increase in the percent of time releases from Harris are at or above the state standard. Assuming the monitoring periods in 2017 – 2022 included the proposed minimum flow unit discharging water with DO levels at or above 5 mg/L, compliance would increase from 73% to 94% (Table 3-1). Further, it is likely that higher DO levels in the minimum flow unit discharge may mitigate lower DO levels in discharge from the existing units, serving to further increase the amount of time the standard is met. Until the new minimum flow unit is installed it is unknown how much additional DO may be added to the current unit discharge.

Table 3-1 Effects of Proposed Minimum Flow Unit on Compliance with the Dissolved Oxygen Standard

Year	Total Meas.	Total Meas. ≥5 mg/L	% Total Meas. ≥5 mg/L	Total Meas. w/ Min. Flow Unit	Total Meas. ≥5 mg/L w/ Min. Flow Unit	% Total Meas. ≥5 mg/L w/ Min. Flow Unit
2017	4341	2420	56%	14688	12767	87%
2018	3224	2923	91%	14688	14387	98%
2019	2201	2193	100%	14688	14680	100%
2020	2890	2751	95%	14688	14549	99%
2021	4281	1688	39%	14688	12095	82%
2022	2619	2466	94%	14688	14535	99%
Average			73%	Average		94%

3.3 National Pollution Discharge Elimination System Permits

The Applicant has secured the necessary National Pollution Discharge Elimination System (NPDES) permit for the continued operation of the Harris Project, which requires an NPDES permit for ten existing discharge points that fall under seven different discharge categories at the Harris powerhouse. Applicant maintains an electronic database of NPDES permit required sampling results.

Table 3-2 Harris NPDES Discharges Categories

DSN001	Discharges of cooling water to include generator cooling water, generator thrust bearing cooling water, turbine guide cooling water, transformer and miscellaneous cooling waters, and filter backwash.
DSN002	Discharges from sumps and drains to include powerhouse sumps and drains, valve pit drains, head cover drains, and gallery sumps and drains.
DSN003	Discharges from plant and unit oil/water separators.
DSN005	Discharges of uncontaminated storm water not elsewhere specified in this permit.
DSN006:	Discharges of pretreated drilling supernate wastewater.
DSN007	Discharges of wastewater resulting from maintenance and repair activities associated with cleaning, pressure washing, blasting, and painting of structures over water.
DSN008	Discharges of uncontaminated storm water from bulk petroleum secondary containment areas.

3.4 Harris Water Quality Following License Issuance

Based on discussion between the Applicant and ADEM in a pre-filing meeting³, the Applicant proposes to monitor dissolved oxygen and water temperature year-round in the Harris Project tailrace during periods of discharge associated with generation or minimum flow releases. The Applicant will also monitor dissolved oxygen and water temperature year-round in the Harris Project tailrace during periods when the Project is not generating, i.e., during unit outages and during drought responses. This monitoring will begin following license issuance and subsequent installation of the minimum flow unit. Applicant will provide annual

³ Pursuant to 40 CFR 121.4(a), the Applicant requested a pre-filing meeting with ADEM on February 8, 2022; such meeting was held on February 28, 2022.

data to ADEM and file with FERC following each monitoring year for the first three years. The data will be filed by February 28 for the preceding year. Following the third full year of monitoring, Applicant will provide a Water Quality Assessment within six months, including if additional measures are needed, to ADEM for determination if the conditions of the WQC are being met. The assessment and ADEM consultation will be filed with FERC. If after the initial three years of year-round monitoring ADEM determines that conditions of the WQC are not being met, Applicant will determine, in consultation with ADEM, additional ways to increase DO and file a plan with FERC for approval. In addition, at any point during the term of the license, the Applicant and ADEM may work together to modify the year-round monitoring requirement during the term of the new FERC license.

In addition to the monitoring proposed above to determine whether the conditions of the WQC are being met, the Applicant also proposes to monitor dissolved oxygen and water temperature year-round at two United States Geological Survey (USGS) gages on the Tallapoosa River downstream of Harris Dam for the term of the new FERC license:

1. Tallapoosa River at Malone (USGS Site No. 02414300)
2. Tallapoosa River at Wadley (USGS Site No. 02414500)

This would likely be accomplished through a cooperative partnership with the USGS, through which the monitoring data would be made available for use by ADEM. At any point during the term of the license, the Applicant and ADEM may work together to modify the year-round monitoring requirement.

4.0 CONCLUSION

Applicant's proposal to install, operate, and maintain a continuous minimum flow unit will significantly improve its ability to meet the DO standard in releases from Harris Dam. Provisions for monitoring and assessment of the need for future improvements support a determination that the subsequent operation of the Harris Project will be conducted in a manner that will ensure compliance with applicable state water quality standards. Applicant (project proponent), hereby requests that ADEM (the certifying authority) review and take action on this Clean Water Act, 33 U.S.C § 1341, Section 401 certification request within the applicable reasonable period of time.

APPENDIX A

WATER QUALITY DATA

(ATTACHED IN MICROSOFT EXCEL SPREADSHEET FORMAT)

Attachment 2

Documentation of Pre-Filing Meeting Request and Application Submittal
Date

Pre-Filing Meeting Request

From: [Chandler, Keith Edward](#)
To: [Chris Johnson - ADEM](#); [Jennifer Haslbauer \(jhaslbauer@adem.alabama.gov\)](mailto:jhaslbauer@adem.alabama.gov); [Moore, David](#); [McVicar, Ashley M](#); [Anderegg, Angela Segars](#)
Cc: [Carlee, Jason](#)
Subject: Harris 401 Pre-Application Meeting
Start: Monday, February 28, 2022 9:00:00 AM
End: Monday, February 28, 2022 11:00:00 AM
Location: ADEM

All,

As discussed we would like to go over what APC proposed in the license application for water quality as well as review what data will be included in the 401 application. We will plan on coming down there if you can reserve a room.

Thanks,

Keith

From: Haslbauer, Jennifer <jhaslbauer@adem.alabama.gov>
Sent: Friday, March 3, 2023 11:11 AM
To: Chandler, Keith Edward; Johnson, Chris L; Moore, David
Cc: Anderegg, Angela Segars; McVicar, Ashley M; Carlee, Jason; Fleming, Amanda
Subject: RE: Harris Water Quality Application

EXTERNAL MAIL: Caution Opening Links or Files

Hi Keith,

This email is to confirm that ADEM has received the Harris Water Quality Application.

Thank you and have a great weekend!

Jennifer Haslbauer, P.E.
Chief, Standards and Planning Section
Water Quality Branch – Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463
(334) 274-4250
adem.alabama.gov



Mission: Assure for all citizens of the state a safe, healthful, and productive environment

From: Chandler, Keith Edward <KECHANDL@SOUTHERNCO.COM>
Sent: Friday, March 3, 2023 8:59 AM
To: Johnson, Chris L <CLJohnson@adem.alabama.gov>; Haslbauer, Jennifer <jhaslbauer@adem.alabama.gov>; Moore, David <djmoore@adem.alabama.gov>
Cc: Anderegg, Angela Segars <ARSEGARS@southernco.com>; McVicar, Ashley M <AMMcVica@southernco.com>; Carlee, Jason <JCARLEE@southernco.com>; Fleming, Amanda <afleming@southernco.COM>
Subject: Harris Water Quality Application

All,

On January 17, 2023 FERC issued its Notice of Ready for Environmental Analysis and request for comments on the final license application. In that notice, FERC requires that "The applicant must file no later than 60 days following the date of issuance of this notice: (1) a copy of the water quality certification; (2) a copy of the request for certification, including proof of the date on which the certifying agency received the request; or (3) evidence of waiver of water quality certification. Please note that the certification request must comply with 40 CFR § 121.5(b), including documentation that a pre-filing meeting request was submitted to the certifying authority at least 30 days prior to submitting the certification request. Please also note that the certification request must be sent to the certifying authority and to the Commission concurrently."

As required by the FERC Notice, Alabama Power is providing an *Application to the Alabama Department of Environmental Management For Water Quality Certification For the R.L. Harris Hydroelectric Project*. The draft application includes everything that we discussed in our February 28, 2022 pre-filing meeting. A hard copy with the check will be delivered to your office today in addition to this electronic submittal.

Please provide confirmation that you all have received the application today so that we can file everything concurrently with FERC.

Let me know if you have any questions.

Thanks,
Keith

Keith Chandler, P.E.

Alabama Power
Environmental Affairs
Office: 205-257-1091
Cell: 205-438-4165
kechandl@southernco.com