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October 1, 2018

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

RE: Lake Elsinore Advanced Pumped Storage Project
FERC Project No. 14227
Supplement to Filing of Requested Additional Information and Additional Study
Plans

Dear Secretary Bose,

The Nevada Hydro Company (the "Company") filed an application for an original license for the Lake Elsinore Advanced Pumped Storage facility, FERC Project No. 14227 (the "Project") on October 2, 2017. On June 15, 2018, in response to requests for additional information and studies from stakeholders, the Federal Energy Regulatory Commission (the "Commission") issued a letter directing the Company to develop additional information and to prepare additional study plans by September 13, 2018. The Company timely filed its response with the Commission, which included responses to comments received by that date from consulted entities.

On September 13, 2018, the Company received comments from the Forest Service regarding several study plans prepared by the Company in response to the Commission's June 15, 2018 letter. These comments were received at 3:30 Pacific time (6:30 Eastern time) and therefore were received after the Company had already submitted its response to the Commission. The Company is submitting herewith a supplement to its table setting forth the Company's responses to comments received from consulted parties. This supplemental table identifies and responds to the Forest Service's comments. Also attached hereto is a copy of the comments the Company received from the Forest Service on September 13, 2018.

The Company appreciates the Forest Service's efforts to respond to the Company's proposed study plans. The Company notes that the Commission's June 15, 2018 letter covered a broad scope of issues that were addressed by the Company in its response to the Commission, and the comments received by the Forest Service do not raise any new issues. As

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a result, the Company again urges the Commission to accept this license application as expeditiously as possible and move forward with the licensing process.

Please let me know if you have questions.

Sincerely,

David Kates

David Kates

On behalf of The Nevada Hydro Company

David Kates

Enclosures

Attachment
Lake Elsinore Advanced Pumped Storage
Response to FERC's Additional Study Requests (Part 2)

Summary of Late Filed Comments Received from the U.S. Forest Service

<u>Study #</u>	<u>Topic</u>	<u>Consulting Party</u>	<u>Comments</u>	<u>Comment Addressed / Accepted</u>		<u>Nevada Hydro Response/Notes</u>
				<u>Yes</u>	<u>No</u>	
2	Seismic Hazard	USFS				
			The USFS commented generally on timing of work for both Study 2 and 3.	X		Nevada Hydro may initiate non-invasive types of work such as additional document review related to the fault, geophysical surveys and confirmation of some of the key parameters that will be needed for the design, as discussed in Section 4.1.2 of the Work Plan for Study 3. After license issuance and prior to undertaking any entry for this initial non-invasive work on National Forest System Lands, Nevada Hydro will submit a final work plan to the USFS for the geophysical surveys only. This plan will present details for fire prevention and control, prevention of damage to Forest property and natural resources, and repair or rehabilitation of any damage resulting from the geophysical surveys, and will include an application for special use authorization to conduct the surveys, pursuant to 36 C.F.R. Part 251, Subpart B, if necessary.
			The USFS expressed concern about the potential amplification and de-amplification effects on the Project.	X		Study 2 was prepared to explain what will be done during the performance of the seismic hazard study for the project. The main purpose of the study is to identify seismic hazards and to develop seismic design input/parameters that are needed by the designers. The designers will choose the appropriate methodology for the design, including the need to perform a dynamic analysis using a 2D or 3D model. The seismic hazard study did not say that 2D dynamic modeling will not be required for the subject project. As set forth in Section 3.7 of the Study Plan, three pairs of time histories will be developed for finite difference

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				<u>Yes</u>	<u>No</u>	
						<p>or finite element analyses described in this comment. Nevada Hydro understands the importance of numerical analyses for the subject project, and this study will provide the seismic design input/parameters that will be needed for the design.</p> <p>The design report will provide specific details about the basis, approach and methodology for the design, including design criteria, design codes and references, design methodologies including the use of 2D/3D dynamic modeling for the design of structural features. This report will follow the completion of the referenced Study 2.</p> <p>Study 2 does not address dynamic modeling for the project. During this initial analysis, a simplified method will be used to determine the stability of the dam under static and seismic conditions, and to determine the rough estimate for the anticipated seismic deformation. For this initial analysis, a pseudostatic coefficient will be developed in Study 2. Only then will designers shift into rigorous 2D/3D dynamic analysis either using finite difference analysis or finite element analysis to estimate the seismic deformation as well as the stresses using three pairs of time histories that will be developed as part of the seismic hazard. This approach will be done for the design of other project components as well, and we selected the dam design component as an example to explain the steps taken during the design process.</p>
3	Geotech	USFS				
			The USFS commented generally on timing of work for both Study 2 and 3	X		Nevada Hydro may initiate non-invasive types of work such as additional document review related to the fault, geophysical surveys and confirmation of some of the key parameters that will be needed for the design, as discussed in Section 4.1.2 of the Work Plan for Study 3. Prior to undertaking any entry for this initial non-

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			The USFS noted that drill fluids are to be approved by the USFS and must be suitable for public potable wells. Further, the drilling proposal should include muck disposal plans and appropriate erosion control and provisions.	X		Nevada Hydro agrees that drilling-related information is relevant to the USFS. Nevada Hydro anticipates filing an application for and receiving a special use authorization from the USFS in the future that will allow investigative drilling on USFS-administered lands. Any drilling activities will be conducted in accordance with this authorization.
			The USFS commented on water table and fluids used during drilling.	X		To elaborate on the descriptions in the Study Plan, location of the water table will be determined as follows: For borings drilled without drilling fluid, the first encounter of the water table will be identified by saturation of drill cuttings, saturated conditions in core and other types of samples collected, sounding of water level in open boreholes when drilling is paused, and in certain cases, installation of piezometers or monitoring wells following completion of drilling. For borings drilled with drilling fluid, first encounter of the water table will be determined by a combination of saturated conditions in core and other types of samples collected, as well as by downhole geophysical logging. Also, after drilling is completed, the drill fluid will be bailed out and the borehole will be flushed until the flushed-out fluid becomes clear. Then, fluid in the borehole will be bailed out and enough time will be allowed for the groundwater table to stabilize, and then measurements will be taken to determine the static groundwater table at the time of drilling. In

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						<p>certain cases, installation of piezometers will be performed following completion of drilling to monitor the groundwater table over a long period of time. In order to prevent fluid loss due to hydro-fracturing that may occur due to excessive drill fluid pressure, the fluid pressure during drilling will be carefully controlled and monitored to prevent fluid loss due to hydro-fracturing. GENTERRA will set the safe fluid pressure based on the depth of drilling, typically GENTERRA recommends ½ psi per foot of drilled depth, but it may be increased while drilling within good quality rock formation.</p> <p>If fluid loss is encountered, it will be addressed by adding thickening agents to the drilling fluid (approved in advance by the USFS), changing to a different type of drilling fluid (e.g. from mud to air), or potentially by installing casing.</p> <p>Prevention or minimization of mixing water at different elevations during the drilling and sampling process will be accomplished either by maintaining positive pressure on the formation by maintaining the borehole full of drilling fluid, or potentially by use of conductor casing; although, use of the latter method is not expected to be warranted, but it may be used if necessary.</p>
			The USFS asks whether packer testing will occur after drilling conclusion or during the suggested selected intervals.	X		Packer testing may be done either during drilling, or following completion of drilling in a particular boring, depending on conditions encountered. This will be a field decision and will depend entirely upon the subsurface conditions encountered. It is possible that additional packer testing in a borehole already tested may be desired following the running of downhole geophysical logging. Some borings may not have any packer testing performed.
			The USFS requested that information collected should include temperature,	X		Nevada Hydro agrees to collect the requested information when the field work described in Study 3 is

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			conductivity, caliper logging, electrical logs, and gamma logs to help define locations of the differential lithology, fracturing groundwater conduits, clay gouge, sediment correlations, and other phenomenon.			done and will share this information with the USFS.
			The USFS asked about whether cations will be surveyed.	X		Selected anions and cations will be analyzed to detect differences in general water quality of groundwater zones encountered, if any. Since most of the rock within the Forest is an igneous massif, and is extensively fractured and jointed, Nevada Hydro anticipates that natural mixing of groundwater throughout the rock mass will be present, and discrete zones of differing chemistry are not anticipated. The suites of anions and cations to be analyzed in particular monitoring wells at various locations will be further developed during the planning process.
			The USFS requests access to all geophysical test results, water chemistry, piezometer data, CPT data, trench maps, and data sets.	X		Nevada Hydro agrees and will submit that information to the USFS.
9	Listed Species					
		USFS	Requested a copy of the Quino Checkerspot butterfly Study Plan	X		Although the USFS did not request this study, Nevada Hydro will provide the Forest with the study plan.
29	Recreation	USFS				
			The USFS recommends a more focused study design	X		Nevada Hydro proposed in its April 3, 2018 Response to FERC's Additional Information Request to document recreation use in the vicinity of the proposed reservoir from March to August. Nevada Hydro will work with the USFS to understand the USFS' preferences with respect to the recreation study.
30	Visual					
		USFS	Would like to review and comment on comment on the study.	X		NHC consulted with the City and the County on this study plan, as directed by FERC; but, did not consult with the USFS because it did not file a study request related to visual simulations. Nonetheless, Nevada

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Forest Service Comments on Additional Studies for LEAPS Project

This document is in response to the Nevada Hydro Company's August 3, 2018 proposed studies entitled: Study 2 Seismic Hazard; Study 3 Geotechnical Investigation; and Aquifer Study Work Plan for the proposed Lake Elsinore Advanced Storage Project (LEAPS), Federal Energy Regulatory Commission (FERC) No. 14227. Additionally, this response addresses concerns related to other FERC required studies for LEAPS, which necessitate Forest Service consultation but were not provided for our review. We recognize that the primary intent of this response is to inform FERC of any disagreements with TNHC's study proposals and to request or suggest modifications to the study designs.

General Comments:

As described in both Study 2 - Seismic Hazard and Study 3 - Geotechnical Investigation, TNHC does not propose to perform either study until, "after the issuance of a license from FERC." This statement conflict's with FERC staff's rationale for requiring these studies, which states, "Any license the Commission may issue for the project would include conditions related to the safe construction and operation of these proposed facilities." It is unclear how FERC or the Forest Service would be able to evaluate or determine whether and under what conditions the construction and operation of LEAPS, would be safe without first investigating these issues prior to FERC issuing the project a license. TNHC must develop this information during the licensing process to allow for the Forest Service to assess project risks to National Forest System Lands and resources, any necessary project design changes under NEPA, and to develop project specific protection, mitigation, and enhancement measures. Prior to undertaking any entry or investigation on National Forest System Lands pursuant to the aforementioned Seismic & Geotechnical studies, TNHC shall submit a final work plan to the Cleveland National Forest and application for special use authorization, pursuant to 36 C.F.R. Part 251, Subpart B. We look forward to working with TNHC to ensure that any special use authorization issued is in compliance with Forest Service standards for fire prevention and control, prevention of damage to Federal property and natural resources, and repair or rehabilitation of any damage resulting from the study activities.

As requested by the Forest Service, and required as Study 28 by FERC's June 15, 2018 Response to Additional Study Requests, TNHC is required to develop a Fire Study, *that would give the Commission and Forest Service staff the opportunity to assess hazardous fuel loading and project infrastructure risk as part of the environmental review.* The Forest Service is reviewing the study proposal by TNHC to evaluate LEAPS potential impacts on fire risk, provided on August 6, 2018. Information from the recent Holy Fire, which burned in areas proposed for use by LEAPS could provide valuable insight and the opportunity to assess how fire-fighting

response would have been impacted by the project.

As required by Study 9 – Updated Surveys for Federally Threatened and Endangered Species, the Forest Service is requesting the opportunity to comment on and review the plan to conduct surveys for *Plantago erecta* and use by Quino checkerspot butterfly, which were likely affected by the Holy Fire and other recent fires in the area.

As proposed in Study 29 – Assessment of Recreation, the Forest Service believes TNHC’s proposal to conduct infrequent and random spot checks near the vicinity of the proposed reservoir, is unlikely to yield any valuable information on potential recreation impacts that would occur as a result of removing this land from public use. The Forest Service recommends a more focused study design to evaluate current use and future need in this area. We would welcome the opportunity to work with TNHC and FERC to develop a more focused recreation study for this site.

As described in Study 30 - Visual Study and in Study 34- Alternative Northern Transmission Alignments and Proposed Transformer Operation, the Forest Service is requesting the ability to review and comment on these studies. The proposed transmission elements of LEAPS have significant potential to impact visual resources and lands administered by the Cleveland National Forest. If projects transmission elements are redefined, altered, or changed, it is likely that such changes would impact National Forest System Lands, since the majority of this elements are sited on the Cleveland National Forest. The Forest Service would like to see alternative transmission elements evaluated under both studies to reduce impacts on NFS lands and resources.

Study 2 & 3 Specific Engineering Comments:

In review of the Seismic Study, the Forest Service is concerned about the potential amplification and de-amplification effects on the Project. We recommend that instead of using a PGA analysis, such investigation should be revised to use a 2D dynamic model. A simplified pseudo static analysis is insufficient in the Forest’s view, and finite difference or element is required with dynamic forces to estimate stress or strain in the system and response of the reservoir and impoundment.

Geotechnical Study Page 14, any and all drill fluids proposed for the investigation must be approved by the Forest Service as part of its special use authorization. All fluids must be suitable for public potable wells, and the drilling proposal should include muck disposal plans and any appropriate erosion control and provisions.

Page 18 describes methodologies for SPT sampling and borings that encounter rock. This section should include discussion about how the location of the water table will be recorded, and provide methods to address fluid loss and the prevention of mixing water at different elevations during the drilling and sampling process.

4.1.7.1 The plan should clarify whether packer testing will occur after drilling conclusion or during the suggested selected intervals.

4.1.7.4-6 In addition to pressuremeter testing and downhole imaging, information should be collected to also include temperature, conductivity, caliper logging, electrical logs, and gamma logs to help define locations of the differential lithology, fracturing groundwater conduits, clay gouge, sediment correlations, and other phenomenon.

7.4.9 Inorganic Anions will be sampled, however the plan does not discuss cations and should clarify if these will be provided or surveyed.

9.1 The Forest Service is requesting access to all geophysical test results, water chemistry, piezometer data, CPT data, trench maps, and data sets.