

Peter Drown
Cleantech Analytics
6717 Cub Run Court
Centreville, VA 20121

Thursday, January 12, 2017

Dr. Michael J. Sale
Executive Director
Low Impact Hydropower Institute

Subject: Recertification Recommendation for the Mother Ann Lee Hydroelectric Facility (FERC #539)

Dr. Sale:

This letter contains my recommendation for Recertification of the Mother Ann Lee Hydroelectric Facility (the "Facility").

Please contact me if you have any questions.

Sincerely,



Peter Drown, President
Cleantech Analytics LLC

I. Background:

The 2.04 MW Facility is located at Lock and Dam 7 on the main stem of the Kentucky River (mile #117.0). The Facility is owned by Lock 7 Hydro Partners, LLC and operated by Shaker Landing Associates, Inc. The Facility operates under a FERC Major License for Projects under 5 MW, issued May 26, 1992, and was originally certified as “Low Impact” on August 11, 2011. The 2.21 MW facility generates approximately 8,535 MWh annually.



II. Recertification Standards

On December 22, 2015, LIHI notified the applicant of upcoming expiration of the Low Impact Hydropower Institute certification for the Mother Ann Lee Hydroelectric Facility. The letter included an explanation from LIHI governing the re-certification process for facilities during 2015 due to the transition year while new criteria are implemented, and informed the applicant that due to revised LIHI criteria “all certificates applying for renewal in 2016 will be required to proceed through both a Phase One and Phase Two.” According to the 2nd Edition LIHI Handbook, the Stage I recertification focuses on three primary questions:

- *Is there any missing information in the application for recertification?*
- *Have there been any material changes in the LIHI criteria or certification process since the facility was originally certified?*
- *Have there been any material changes (defined below) at the facility during the term of the previous certification?*

The Stage II recertification review involves a complete review of the application package, a search of public records associated with the facility, and all other necessary inquiries (e.g., to resource agencies and local non-governmental organizations) to resolve factual disputes, evaluate the veracity of claims, or make other inquiries as needed. The application reviewer also reviews and summarizes all public comments received.” (LIHI 2nd Edition Handbook, Revised March 7, 2016)

As this facility was one of the first recertifications to take place under the revised LIHI criteria, former Executive Director Mike Sale completed the Stage I review. This Report comprises the Stage II recertification review of the recertification application submitted on September 29, 2016.

III. Adequacy of the Recertification Package

The Applicant states that there were no material changes in the facility design or operation since the most recent LIHI review, and no changes in environmental conditions for the project. I have reviewed the application

package, conducted a full review of public records on FERC e-library since the most recent LIHI recertification (12/05/2012, Pat McIlvayne), and contacted agencies and stakeholders responsible for managing resources affected by this Facility (see Appendix A.)

On December 27, 2014, the Applicant completed a runner replacement project which raised the overall project capacity from 2.04 MW to 2.21 MW. The Applicant contacted all relevant federal and state resource agencies with regulatory authority in the project region and presented the draft license amendment. None of the agencies objected to the upgrade. FERC noted in their order approving the project (Appendix B):

“The turbine runner replacement would not change project operations but would increase the hydraulic capacity of the project from 2,229 cfs to 2,386 cfs. Therefore, inflow between 2,229 and 2,386 cfs would pass through the powerhouse instead of spilling over the dam as it currently does. This would decrease the amount of spill over the dam, however, it would not affect flow or habitat downstream of the project and no concerns regarding aquatic resources have been identified...the licensee’s proposal to replace the turbine runner for Unit 2 would have no effect on fish and wildlife, land use, recreation resources, or cultural resources.”

Since this project had no significant change in project operation and constitutes regular maintenance of the plant, I do not find this to be a material change. Furthermore, this runner was donated for educational purposes to the Jessamine County Parks and Recreation Department.

The Applicant selected the new LIHI PLUS standard for three criteria – water quality, cultural and historic resources protection, and recreational resources. This standard provides three bonus years of certification for the first PLUS standard satisfied, and an additional two years for subsequent PLUS standards satisfied, up to a maximum term of ten years. The following assesses the appropriateness of PLUS standards for this application:

- **Water Quality Standard B-PLUS:** *“In addition to satisfying one or more of the standards above, the facility has deployed advanced technology to enhance ambient water quality or is operating an adaptive management program to regularly evaluate the operation of the project with respect to water quality.”*

The Applicant has developed an adaptive management program, by operating their units so that aeration is provided when low dissolved oxygen levels are detected. The WQC requires the Applicant to shut down the turbines when low DO is detected. I spoke with the Stephanie Hayes, Supervisor for the Kentucky Department of Natural Resources and Environmental Protection, Division of Water, and she sent me a letter that stated the facility was in compliance with the WQC, and the facility was not a cause of the impairments of the downstream reaches of the Kentucky River. Compliance alone would not be sufficient to pass the PLUS criterion, as this is an agency requirement. However, the Applicant provided further information regarding a new operational protocol that allows the turbines to continue to spin in these situations, drawing air through the crown plate. According to the Applicant, this protocol is not required by their FERC license or WQC and does result in some lost revenue, but they continue to operate in this way to preserve water quality on the Kentucky River. In addition, they monitor DO year-round to provide datasets to researchers and agencies, despite only being required to monitor from June – October. In my opinion, these actions qualify as an Adaptive Management Program with the “outcome” being dissolved oxygen level that meets or exceeds state standards and the “management actions” being the operational protocol.

- **Cultural and Historic Resources Protection Standard G-PLUS:** *“The applicant has made a substantial commitment to restoring one or more significant cultural or historical resource in the vicinity beyond what is required in existing plans, such as a Historic Resources Management Plan; or the Facility has created a significant new educational opportunity about cultural or historical resources in the area, and has contractual obligations that guarantee that this opportunity will exist for the duration of the LIHI certification.”*

The Applicant has created significant new educational opportunities about cultural, historical and STEM-related aspects of the Mother Ann Lee Hydroelectric Facility. These include offering tours of the plant and presentations about the history of the facility, the founders (Mother Ann Lee and the Shakers,) and renewable energy in general. They initiated a project with a local 4th grade class – Bloom Elementary – to allow students to paint the generators with local fish species and taught the class about renewable energy and the history of the project, effectively transforming the project into a Children’s Art Gallery. The Applicant furthermore donated an old runner off the plant to the Jessamine County Parks and Recreation Department to display in an adjacent park, and plans to add interpretative signage to discuss how the runner was in operation from 1927 – 2014, and how the operations of the Kentucky Lock and Dam system impacted settlement in this region of Kentucky. In my opinion, the Applicant has created significant new educational opportunities from the Facility, beyond any required by regulatory authority.

- **Recreational Resources Standard H-PLUS:** *“The Facility has created significant new public recreational opportunities in the area of the Facility beyond any otherwise required by agencies, such as campgrounds, whitewater parks, boating access facilities and trails, which opportunities do not create unmitigated impacts to other resources, beyond those required as a part of the Facility’s license.”*

The original FERC license for this project noted that there were “no recreational opportunities” in the project vicinity. The Applicant is currently working with the Jessamine County Parks and Recreation Department to change this, by adding new recreational enhancements such as canoe portages, fishing pier, and walkway (and possibly bathrooms) to promote access to the project area. These project lands are owned by the Kentucky River Authority. The Applicant has verbally committed to Jessamine County to help fund these projects. I spoke with Jerry Graves, Executive Director of the Kentucky River Authority who owns and manages this property, and he expressed his full support of those discussions as an opportunity to strengthen and revitalize the Kentucky River. I also spoke with Kentucky Department of Fish and Wildlife Resources, who noted that “these improvements should greatly improve recreational value and much-needed fishing access and KDFWR supports these efforts.”

The application was public noticed and received 0 public comments. During the review process, I spoke with and solicited comments from the following agency contacts:

- Jerry Graves, Executive Director of the Kentucky River Authority
- Stephanie Hayes, Supervisor, Kentucky Department of Natural Resources and Environmental Protection
- Joseph Zimmerman, Kentucky Department of Fish and Wildlife Resources

Records of these conversations is included in Appendix A. No agencies objected to the recertification of this Facility, and noted that the Owner has been fully compliant with all regulatory requirements. They furthermore noted that they are encouraged by the recreational enhancements proposed by the Applicant in concert with the Jessamine County Parks and Recreation Department.

IV. There have not been “material changes” at the facility that would affect recertification

In accordance with the Recertification Standards, "material changes" mean non-compliance and/or new or renewed issues of concern that are relevant to LIHI's criteria. Based on my review of materials provided, review of FERC's public records, and consultation with the noted individuals, I found that there are no areas of noncompliance or new or renewed issues of concern. This application represents a strong continued addition to the LIHI program, and meets or exceeds LIHI standards for every criterion. They have initiated *more stringent* water quality standards in the river, developed operational protocol to shut down turbine operation and aerate the water when low dissolved oxygen levels are measured, demonstrated a commitment to using their plant to promote educational opportunities to nearby schools, and to use project funds to assist Jessamine County with

recreational access to the project's vicinity.

(Please note: this project's license is due to expire in 2022, and relicensing discussions begin next year with the resource agencies. As a new license will be implemented in the last year of LIHI recertification, any operational changes will need to be considered during the next review process.)

In my opinion, the materials provided and referenced above are sufficient to make a recertification recommendation, and no further application review is needed.

V. LIHI's certification process has been revised since the previous certification

As described above, the LIHI criteria were revised for 2016 applications, which is the reason for this Stage II recertification review.

VI. Conclusion

In conclusion, I recommend Recertification of the Mother Ann Lee Hydroelectric Facility to one new, **Ten-Year Term**. Given the comments on water quality and recreational enhancements, and as part of the PLUS certification, I am recommending the following conditions:

- The facility owner shall provide LIHI with a brief annual report describing time periods when turbines are operated to increase aeration and the minimum dissolved oxygen concentrations downstream observed during those periods. This report on water quality enhancements shall be included with the annual compliance statement to LIHI. A copy of the letter report that has been sent in past years to the Kentucky Department of Natural Resources, Division of Water, will be sufficient to satisfy this condition.
- The facility owner shall continue work with Jessamine County Parks and Recreation Department to make recreational enhancements to the project area. The owner shall provide a brief summary of progress in this effort annually along with the annual compliance statement due to LIHI. The owner shall also provide LIHI with a final report on the recreational enhancements within one (1) month of their completion.

Please contact me if you have any questions.

Sincerely,



Peter R. Drown, President
Cleantech Analytics LLC

Appendix A Agency and Applicant Communications

Date: 11/18/2016

Contact Person: Jerry Graves, Executive Director

Agency: Kentucky River Authority

I spoke with Mr. Graves briefly to discuss the Mother Ann Lee project, as his agency is responsible for managing the surrounding property and operating the lock and dam. He is very comfortable with the Lock 7 project, noted they are in compliance with all flow requirements set by his agency, are good stakeholders and he has no complaints. He is also engaged in the discussions with Jessamine County on recreational enhancements proposed in the area, and is fully supportive of those discussions as an opportunity to strengthen and revitalize the Kentucky River.

Date: 11/17/2016

Contact Person: David Kinloch

Agency: Applicant

I called Mr. Kinloch to determine appropriate water resource agency contact to provide LIHI comments, as previous attempt to reach Joyce Fry was unsuccessful and contact at KY Department of Natural Resources (Stephanie Hayes) told me to submit a FOIA in order to receive a comment. Kinloch informed me that Joyce may be better reached by email. Furthermore, Kinloch updated me on the status of discussions with the City of Jessamine regarding recreational opportunities at the site. Kinloch has offered to help the town fund recreational enhancements at the site, including canoe portages, fishing pier, and potentially bathrooms. The Town is excited about the opportunity and plans to work with Kinloch and company to implement the projects.

Date: 11/17/2016

Contact Person: Stephanie Hayes, Supervisor

Agency: Kentucky Department of Natural Resources and Environmental Protection, Division of Water

I spoke with Stephanie to solicit comments on the project operations and impact on water quality. The previous contact that handled these requests was Joyce Fry, but she is currently unavailable for an undetermined amount of time. She directed me to submit a FOIA request, which I did. Upon the receipt of this request, Stephanie Hayes forward me the comment letter in Appendix C, which is a 2012 determination that the facility is in compliance with the terms of its Water Quality Certificate.

Date: 11/17/2016

Contact Person: Joseph Zimmerman

Agency: Kentucky Department of Fish and Wildlife Resources

I called and emailed Joseph Zimmerman to solicit comments, and subsequently received an official comment from his agency stating no objection to the recertification of the Mother Ann Lee Facility and furthermore noting it has no adverse impact on any riverine fish species. See Appendix B.

Appendix B. Kentucky Department of Fish and Wildlife Resources Comment Letter



**TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY DEPARTMENT OF FISH & WILDLIFE RESOURCES**

Matthew G. Bevin
Governor

#1 Sportsman's Lane
Frankfort, Kentucky 40601
Phone (502) 564-3400
1-800-858-1549
Fax (502) 564-0506
fw.ky.gov

Regina Stivers
Deputy Secretary

Don Parkinson
Secretary

Gregory K. Johnson
Commissioner

28 November 2016

Peter Drown
Cleantech Analytics, LLC
6717 Cub Run Court
Centreville, VA 20121

RE: Mother Ann Lee Hydropower Facility
Kentucky River Lock #7
Recertification Application to the Low Impact Hydropower Institute

Dear Mr. Drown:

The Kentucky Department of Fish and Wildlife Resources (KDFWR) has received your request for information pertaining to the subject project. The Kentucky Fish and Wildlife Information System does not indicate federally-listed species are known to occur within close proximity to the project, and impacts to these species from the continued operation of the facility is not anticipated. Specifically, aquatic federally-listed species are not known to occur within 10 miles of the project. Please be aware that our database system is a dynamic one that only represents our current knowledge of various species distributions.

Further, KDFWR does not believe this facility adversely impacts the sustainability of native riverine fish populations. High water events can lead to upstream and/or downstream migrations of fish, but the continued operation of this facility does not pose a threat to these species in terms of life cycle completion or access to necessary habitats for spawning and other activity. The facility is also required to be operated to maintain "run-of-river", and operation will not occur if the water level falls below the crest of Dam 7.

Lastly, KDFWR appreciates the coordination between the Kentucky River Authority and the Jessamine County Parks and Recreation Department to open up land near the facility to public use. Based on the recertification application (LIHI #24, FERC Project No. 539), a canoe portage, a fishing pier, and a walkway to gain safe fishing access to the tailwater is proposed. These improvements should greatly improve recreational value and much-needed fishing access and KDFWR supports these efforts.

I hope this information is helpful to you, and if you have questions or require additional information, please call me at (502) 564-7109 extension 4453.

Sincerely,



Dan Stoelb

Appendix C. Kentucky DEP Division of Water Comment (2012)



STEVEN L. BESHEAR
GOVERNOR

LEONARD K. PETERS
SECRETARY

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
200 FAIR OAKS LANE, 4TH FLOOR
FRANKFORT, KENTUCKY 40601
www.kentucky.gov

April 2, 2012

Mr. David Brown Kinloch
Lock 7 Hydro Partners, LLC
414 South Wenzel Street
Louisville, KY 40204

Re: WQC# 2005-0103-8
AI No: 51793, Activity ID: APE20050001
KY Lock No 7 & Dam Site
Mother Ann Lee Hydroelectric Station
FERC License No. 539
Kentucky River
Mercer County, Kentucky

Dear Mr. Kinloch:

At your request, this letter is to confirm your compliance with the conditions of Water Quality Certification (WQC) # 2005-0103-8 issued October 17, 2005 for FERC License No. 539. The Kentucky Division of Water has received or has had access to the Dissolved Oxygen (DO) data that has been monitored between June 1st and October 31st of each year since the year of 2006. The aforementioned WQC remains valid as of the date of this letter and is the most recent WQC issued by the Division of Water.

The following Kentucky River segments downstream of the Mother Ann Lee Hydroelectric Station (at approximately KRM 119.9) have been noted to have fish consumption impairments: KRMs 0.3-11.5, 53.2-66.95, 67.0-84.25, 99.1-119.9. However, there is no reason to believe that the hydro plant contributes to this impairment. For additional information, see the following website for the 2010 Integrated Report to Congress on the Condition of Water Resources in Kentucky:
<http://water.ky.gov/waterquality/Integrated%20Reports/2010IntegratedReportFinal.pdf>.

All future correspondence on this project must reference AI No. 51793. If you should have any questions concerning this letter, please contact Ms. Joyce Fry of my staff, at (502) 564-3410.

Sincerely,



Barbara Scott, Supervisor
Water Quality Certification Section
Kentucky Division of Water

BJS:JF

**Appendix C
License Amendment for Runner Upgrade**

20140123-3116 FERC PDF (Unofficial) 01/23/2014

146 FERC ¶ 62,053
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Lock 7 Hydro Partners, LLC

Project No. 539-013

ORDER AMENDING LICENSE AND REVISING ANNUAL CHARGES

(Issued January 23, 2014)

1. On September 23, 2013, and supplemented on January 13, 2014, Lock 7 Hydro Partners, LLC, the licensee for the 2040-kilowatt (kW) Mother Ann Lee Project No. 539, filed an application to amend its license. The project is located on the Kentucky River in Mercer and Jessamine Counties, Kentucky.¹

BACKGROUND

2. The project is authorized with 3 generating units with a total installed capacity of 2,040 MW and a total hydraulic capacity of 2,229 cubic feet per second (cfs). Each of the generating units has a turbine rated at 750 kW with a hydraulic capacity of 743 cfs, connected to a generator rated at 680 kW.

PROPOSED AMENDMENT

3. The licensee proposes to upgrade generating Unit 2 by replacing the turbine runner and re-rating the generator. The upgrades would increase the authorized installed capacity of the project from 2,040 kW to 2,209 kW, and the hydraulic capacity from 2,229 cfs to 2,386 cfs. In the filing, the licensee included description of the changes to generating Unit 2. The table below summarizes the project's installed capacity.

Mother Ann Lee Project						
	Licensed			Proposed per Amendment		
	Turbine Rating (kW)	Generator Rating (kW)	Controlling Unit (Generator)	Turbine Rating (kW)	Generator Rating (kW)	Controlling Unit (T or G)
Unit 1	750	680	680	750	680	680(G)
Unit 2	750	680	680	849	850	849(T)
Unit 3	750	680	680	750	680	680(G)
<i>Total AIC (kW)</i>			<i>2,040</i>			<i>2,209</i>

¹ *Kentucky Utilities Company*, 59 FERC ¶ 62,186 (1992), *Lock 7 Hydro Partners, LLC*, 113 FERC ¶ 62,150 (2005), and *Lock 7 Hydro Partners, LLC*, 130 FERC ¶ 62,085 (2010).

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CONSULTATION

4. Prior to filing its amendment application, by letters dated July 9, 2013, the Applicant sent out copies of the draft license amendment application to the consulting agencies that have been traditionally involved with FERC hydropower licensing in Kentucky: U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, U.S. National Park Service, U.S. Department of the Interior, National Marine Fisheries Service, Kentucky River Authority, Kentucky Department of Natural Resources, Kentucky Department of Fish and Wildlife Resources, Kentucky State Historic Preservation Office (Kentucky SHPO), Kentucky Department of Parks, and Salt River Electric.
5. The Kentucky SHPO, by letter dated July 23, 2013, states that the replacement of turbine runner for Unit 2 will not impact any National Register properties or sites and that consultation under section 106 of the National Historic Preservation Act has been fulfilled.
6. On November 12, 2013, we issued a public notice of the amendment application, with December 30, 2013 deadline for filing comments, motions to intervene, and protests. We received no comments.

REVIEW

Installed Capacity

7. The new turbine runner for Unit 2 would increase the installed capacity from 750 kW to 849 kW and the hydraulic capacity from 743 cfs to 900 cfs. Consequently, the project's total authorized installed capacity would increase from 2,040 kW to 2,209 kW and the annual charges under license article 201 will be revised, as shown in ordering paragraph (D) of this order.

Revised Exhibit A

8. The filing includes a description of the changes to generating Unit 2, but did not include a revised Exhibit A to reflect the changes. Ordering paragraph (C) of this order requires the licensee to file a revised Exhibit A to include the changes to Unit 2, within 30 days of the issuance date this order.

Construction

9. The proposed upgrade would not involve any changes to the project's civil works or other project features associated with replacing the Unit 2 runner. Ordering paragraph (F) of this order requires the licensee to commence and complete construction of the

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project works authorized in this order within 1 year and 2 years of the issuance date of this order, respectively.

As-Built Exhibits

10. In ordering paragraph (E) we are requiring the licensee to file, within 60 days after completion of construction, revised exhibit A, as applicable, to show and describe the project facilities as-built. This would only be required if completed construction on Unit 2 is different than authorized in this order.

Environmental Analysis

11. As stated above, prior to filing its amendment application with the Commission, the licensee provided the application to the resource agencies for review and comment. In response, the licensee received a letter from the Kentucky SHPO stating that there will be no historic properties affected by the proposed amendment. No other resource agencies commented on the application. In addition, no resource agencies responded to the Commission's public notice of the proposed amendment.

12. The proposed turbine runner replacement does not involve any ground disturbing activities. The replacement of the turbine runner and associated activities would take place within the powerhouse and therefore will not impact any terrestrial or land use resources.

13. The turbine runner replacement would not change project operations but would increase the hydraulic capacity of the project from 2,229 cfs to 2,386 cfs. Therefore, inflow between 2,229 and 2,386 cfs would pass through the powerhouse instead of spilling over the dam as it currently does. This would decrease the amount of spill over the dam, however, it would not affect flow or habitat downstream of the project and no concerns regarding aquatic resources have been identified.

CONCLUSION

14. For the reasons discussed above, the licensee's proposal to replace the turbine runner for Unit 2 would have no effect on fish and wildlife, land use, recreation resources, or cultural resources. Therefore, we conclude that issuance of this order will not constitute a major federal action significantly affecting the quality of the human environment. In ordering paragraph (B) of this order, we will revise the project description. In ordering paragraph (C) we will require the licensee to file revised Exhibit A to include the changes to Unit 2. In ordering paragraph (D) we will revise the annual charges under license article 201, effective with the issuance date of this order. In ordering paragraph (E) we will require the licensee to file after completion of construction, revised exhibit A, as applicable, to show and describe the project facilities

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as-built. In ordering paragraph (F) we will require the licensee to commence and complete construction of the project works authorized in this order within 1 year and 2 years of the issuance date of this order, respectively.

The Director orders:

(A) The license for the Mother Ann Lee Project, FERC No. 539, is amended as provided by this order, effective the day this order is issued.

(B) Item (e) under ordering paragraph (B)(2) of the license, is revised to read as follows:

(e) a 93-foot-long, 25-foot-wide and 6.5-foot-high superstructure/powerhouse located above the spillway supported by hollow concrete piers, with three generating units (2 units, each having a 750-kilowatt (kW) turbine connected to 680-kW generator, and one unit with a 849-kW turbine connected to a 850-kW generator) having a total authorized installed capacity of 2,209 kW, and a total hydraulic capacity of 2,386 cfs;

(C) Within 30 days from the issuance date of this order, the licensee shall file a revised Exhibit A to reflect the changes to Unit 2 as authorized in this order.

(D) Item (a) of Article 201 of the license is revised to read as follows:

(a) Reimbursing the United States for the cost of administration of Part I of the Federal Power Act. The authorized installed capacity for that purpose is 2,209 kilowatts, effective with the issuance date of this order.

(E) Within 60 days of completion of construction of the facilities authorized by this amendment, the licensee shall file for Commission approval, revised Exhibit A, as applicable, to reflect as-built conditions of the project; only required if completed construction on Unit 2 is different than authorized in this order. A courtesy copy shall be filed with the Commission's Division of Dam Safety and Inspections – Atlanta Regional Office. The filing shall also include a copy of nameplate photos for each of the upgraded generating units authorized in this amendment.

(F) The licensee shall commence construction of the project works authorized in this order within 1 year of the issuance date of this order and shall complete construction within 2 years of the issuance date of this order.

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(G) This order constitutes final agency action. Any party may file a request for rehearing of this order within 30 days from the date of its issuance, as provided in section 313(a) of the Federal Power Act, 16 U.S.C. § 8251 (2006), and the Commission's regulations at 18 C.F.R. § 385.713 (2013). The filing of a request for rehearing does not operate as a stay of the effective date of this order, or of any other date specified in this order. The licensee's failure to file a request for rehearing shall constitute acceptance of this order.

M. Joseph Fayyad
Engineering Resources Branch
Division of Hydropower Administration
and Compliance