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VIA ELECTRONIC FILING

Project No. 2628-065
R.L. Harris Hydroelectric Project
Transmittal of the Updated Study Report Meeting Summary

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
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. 2628-065). On April 12, 2019, FERC issued its Study Plan Determination[1] (SPD) for the Harris Project, approving Alabama Power's ten relicensing studies with FERC modifications. On May 13, 2019, Alabama Power filed Final Study Plans to incorporate FERC's modifications and posted the Final Study Plans on the Harris relicensing website at www.harrisrelicensing.com.

Pursuant to the Commission's Integrated Licensing Process (ILP) and 18 CFR § 5.15(f), Alabama Power filed the Harris Project Updated Study Report (USR) on April 12, 2021[2] and held the USR Meeting on April 27, 2021.

Stakeholders have until June 11, 2021 to file written comments with FERC on the attached USR Meeting Summary. All comments must adhere to FERC regulations at 18 CFR Section 5.15 (c)(2)-(7). Any proposal for new information gathering or studies is subject to paragraph (e) of Section 5.15 except that the proponent must demonstrate extraordinary circumstances warranting approval. Stakeholders may access the USR Meeting Summary on FERC's website (http://www.ferc.gov) by going to the "eLibrary" link and entering the docket number (P-2628). The USR Meeting Summary is also available on the Project relicensing website at https://harrisrelicensing.com.

[1] Accession No 20190412-3000.

[2] Accession No 20210412-5737.

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

Attachment – Updated Study Report Meeting Summary

cc: Harris Stakeholder List

Attachment
Updated Study Report Meeting Summary

Updated Study Report Meeting Summary
Harris Project
April 27, 2021
9:00 am – 12:00 pm
Microsoft Teams Meeting

Participants:
Angie Anderegg – Alabama Power Company (Alabama Power)
Wes Anderson – Alabama Power
Dave Anderson – Alabama Power
Jeff Baker – Alabama Power
Katie Bolton – Alabama Power
RaeLynn Butler – Muscogee (Creek) Nation
Jason Carlee – Alabama Power
Bryant Celestine – Alabama Coushatta Tribe of Texas
Keith Chandler – Alabama Power
Maria Clark – Environmental Protection Agency (EPA)
Evan Collins – United States Fish and Wildlife Service (USFWS)
Allan Creamer – Federal Energy Regulatory Commission (FERC)
Jim Crew – Alabama Power
Colin Dinken – Kleinschmidt Associates (Kleinschmidt)
Danielle Elefritz - FERC
Amanda Fleming – Alabama Power
Todd Fobian – Alabama Department of Conservation and Natural Resources (ADCNR)
Mike Godfrey – Alabama Power
Chris Goodman – Alabama Power
Stacey Graham – Alabama Power
Jim Hancock – Balch and Bingham
Jennifer Haslbauer – Alabama Department of Environmental Management (ADEM)
Martha Hunter – Alabama Rivers Alliance (ARA)
Kelly Kirven – Kleinschmidt
Carol Knight – Downstream Property Owners
Lisa Martindale – Alabama Power
Donna Matthews – Downstream Property Owner
Lydia Mayo – EPA
Amanda McBride – Alabama Historical Commission (AHC)
Rachel McNamara – FERC
Ashley McVicar – Alabama Power
Tina Mills – Alabama Power
Jason Moak - Kleinschmidt
David Moore – ADEM
Barry Morris – Lake Wedowee Property Owners' Association
Kenneth Odom – Alabama Power
Courtenay O'Mara – Georgia Power Company
Erin Padgett – USFWS
Alan Peeples – Alabama Power

Jennifer Rasberry – Alabama Power
Sarah Salazar - FERC
Kelly Schaeffer – Kleinschmidt
Robin Soweka – Muscogee (Creek) Nation
Sheila Smith – Alabama Power
Monte Terhaar - FERC
Jimmy Traylor – Downstream Property Owner
Sandra Wash – Kleinschmidt
Jack West – ARA
Ken Wills – Alabama Glade Conservation Coalition
Josh Yerby – Alabama Power

Updated Study Report (USR) Meeting Summary:

Angie Anderegg (Alabama Power Company (Alabama Power)) opened the meeting with a safety moment, reviewed Harris Relicensing milestones, and noted an upcoming (May 3, 2021) Harris Action Team (HAT) meeting on the Battery Energy Storage System (BESS) study. Angie stated the Updated Study Report (USR) meeting purpose: to present an overview of the study progress, including data collected, any variance to the study plan or schedule, and remaining activities for the Harris studies.

Dave Anderson (Alabama Power) presented the study progress, applicable variances, and remaining activities on the Operating Curve Change Feasibility Analysis study. Sarah Salazar (Federal Energy Regulatory Commission (FERC)) asked if Alabama Power would consolidate the effects on resources of the operating curve alternatives combined with proposed downstream alternatives in the Preliminary Licensing Proposal (PLP) so that stakeholders could comment on those proposed measures knowing the combined effects of both. Angie confirmed that only if Alabama Power's proposal includes both a downstream release and a change in the operating curve would those be analyzed together. Allan Creamer (FERC) noted that all existing erosion sites identified in the Erosion and Sedimentation Study appear to be located above the summer pool elevation and asked if an increase in the winter pool could cause additional wind and wave action on portions of the shoreline from a potential increase in recreation/boating. Dave agreed that the potential for that effect exists. Angie confirmed that, in general, there would be an increase in wave action with an increase in recreation. Allan recommended that this be identified as a potential effect on erosion in the *Operating Curve Change Feasibility Phase 2 Analysis Study Report*.

Sarah asked if the GIS data associated with the *Operating Curve Change Feasibility Phase 2 Analysis Study Report* had been filed. Dave replied no and noted that the GIS data will be filed with the Final License Application (FLA) in November. Sarah noted that the Project Boundary layer and the two other GIS layers filed with the *Phase 1 Project Lands Evaluation Study Report* contained differing projections and she requested that future GIS data layers use the same projection and coordinate system. Dave asked if the GIS data could be provided through the Harris Relicensing Website instead of FERC's e-Library. Sarah confirmed that the data would need to be filed on FERC's e-Library but could be added to the Harris Relicensing website as well. Donna Matthews asked for clarification on the variance related to the use of historic photos

on Lake Harris[1]. Dave stated that historical aerial photos of the identified sedimentation sites on Harris Reservoir were to be compared to 2015 high-resolution photos; however, poor resolution of the historic photos did not provide the ability to compare the photos. Jason Moak (Kleinschmidt) added that Alabama Power's historic photos of the lake were also taken during different times of the year when the lake was at different levels. Donna asked if the photographs could be overlayed using landmarks. Dave mentioned that the photos could be georeferenced and overlayed, but the resolution of the photographs are not comparable. Jimmy Traylor (Downstream Property Owner) stated there were no advantages to downstream property owners if Alabama Power increased the lake level elevation, but instead could increase flooding and erosion downstream. Jimmy asked if Alabama Power could limit flooding by pre-evacuating the reservoir. Dave stated that pre-evacuation of the reservoir is not in the current Water Control Manual (WCM) procedures that are established by the U.S. Army Corps of Engineers (USACE). Jimmy asked if that could be changed. Dave noted it potentially could with extensive studies and noted that the USACE would require a lot more data to evaluate a change in the flood control procedures compared to the information Alabama Power has gathered thus far. Angie added that would be outside of the scope of the relicensing process.

Dave presented the study progress, applicable variances, and the remaining activities on the Downstream Release Alternatives Phase 2 study. Barry Morris (Lake Wedowee Property Owner's Association (LWPOA) stated that the 300 cubic feet per second (cfs) continuous minimum flow (CMF) is double the flow that Alabama Power currently passes through the dam and inquired on how 300 CMF would not affect the reservoir level. In addition, Barry asked if there would be a rule that would cutback the CMF depending on inflows to the lake. Angie responded that 300 CMF does not affect the reservoir level as there would be less water on peak and instead would pass continuously. Angie noted that the Green Plan (current operations) has provisions for cutbacks during drought. Angie added that if a minimum flow were proposed, Alabama Power would evaluate what drought cutback is needed for the minimum flow operations and how that would be provided. Barry asked for confirmation that the only time Alabama Power would cutback the CMF is during drought operations. Angie confirmed and noted that a drought cutback is built into the HEC-ResSim model that was used in the relicensing studies. Sarah asked if the terminology of the CMF alternatives could include "plus peaking" to clarify that the CMF is not the only water that is passing through the dam. Angie noted that Alabama Power will clearly describe its operations proposal in the PLP.

Allan asked for clarification on the trend in the average daily water surface fluctuation exceedance tables and on the average wetted perimeter tables in the *Downstream Release Alternatives Phase 2 Analysis Study Report*. Dave asked Allan to submit written comments on the draft report. Jack West (Alabama Rivers Alliance (ARA) noted that the 150 CMF and 300 CMF alternatives had no effect on Harris Reservoir elevations, with 600 CMF having an adverse effect. Jack asked if anything between 300 CMF and 600 CMF were modeled and at what point the CMF begins to impact lake levels. Dave responded that Alabama Power analyzed the alternatives that were approved by FERC and did not model anything between 300 CMF and 600 CMF. Jimmy asked why Alabama Power only considered the flow from the Tallapoosa River and had not analyzed the flow from the Little Tallapoosa River. Dave stated the Heflin gage was

[1] While use of historic photos from Lake Harris was mentioned in the Operating Curve Change Analysis Study Plan, photos could not be used to assess the effects of the winter pool alternatives due to the limited resolution of the historical photos. This was noted as a variance in the Updated Study Report and is separate from the downstream historical photos submitted by Donna Matthews that were filed with FERC.

found to be more representative of flows in the basin when the Green Plan (GP) was developed. Jimmy noted that if a CMF is proposed, the flow from the Tallapoosa River and the Little Tallapoosa River should be analyzed to understand the impacts to Harris Reservoir and the Tallapoosa River downstream. Dave stated that current operations in the model are based on the Heflin gage in the Tallapoosa River[2].

Carol Knight (Downstream Property Owner) stated concerns regarding erosion downstream of Harris Dam and recommended pre-evacuation of the reservoir be further considered. Alan Peeples (Alabama Power) explained that pre-evacuation could exacerbate flooding downstream due to error in rain forecasts. In addition, the current operations are dictated by the USACE WCM. Sarah asked why the 300 CMF+GP would impact reservoir elevations while the 300 CMF does not, even though the alternatives represent the same volume of water. Dave clarified that the two alternatives are not the same volume, as the 300 CMF+GP includes GP pulses in addition to the CMF and peaking operations (while 300 CMF includes 300 cfs CMF and peaking operations). Sarah asked for clarification, in that the GP pulses are subtracted from what would be used for peaking at any given time. Angie explained that in the model there is a rule that maintains the reservoir level and any water available above that needed for the CMF is allocated for peaking. Angie noted that the amount available for peaking varies depending on inflow (i.e. there are times when there is only enough water available for the CMF) and added that the higher CMF alternatives (and the 300 CMP+GP alternative) impact reservoir levels due to outflow being greater than inflow. Regarding impacts to generation, Monte Terhaar (FERC) requested megawatt hours (MWh) be presented in the summary table in the operating reports in addition to the monetary value. Kelly confirmed this change will be made in the Final Phase 2 reports.

Tina Mills (Alabama Power) presented the study progress, applicable variances, and remaining activities for the Battery Energy Storage System (BESS) study. There were no questions.

Jason M. presented study progress, applicable variances, and remaining activities for the Water Quality study. Allan noted that Table 4-9 of the *Water Quality Study Report* provides a monthly summary of dissolved oxygen (DO) and temperature data from the continuous monitor from 2019-2020 and asked how the generation and non-generation data would compare at that monitor. Jason M. noted that the analysis was not included in the report but anecdotally, there were minimal differences between data collected at the same time at the generation monitor versus the continuous monitor. Jason M. added that the monitors are approximately one-half mile apart so there is travel time to account for. Keith Chandler (Alabama Power) explained that the continuous monitor location was chosen in consultation with Alabama Department of Environmental Management (ADEM) as a site to monitor the fishery and the generation monitor location was agreed upon with ADEM as a site that was representative of turbine discharge. Keith added that travel time or other potential influences have not been evaluated at the continuous monitor. Allan stated that he would not expect travel time to impact data with the sites being approximately one-half mile apart. Keith clarified that the intent of the continuous monitor was to monitor the fishery, not plant discharge. Allan requested the data spreadsheet include generation information for the continuous monitor in order to compare DO and temperature. Jason M. added that zero generation listed for either data set does not mean zero

[2] Alabama Power notes that while the Green Plan is based on Heflin gage flows, the model used to analyze the downstream release alternatives uses average daily basin flows from 1939-2011.

flow since there is still flow while the river reaches equilibrium following generation in addition to intervening flows.

Jason M. presented the study progress, applicable variances, and remaining activities on the Erosion and Sedimentation study. Sarah noted that erosion is an area of concern for many stakeholders and wanted to ensure stakeholders had a chance to review the report and understand the results. Donna noted she had not had a chance to review the report and noted historical photos should be on the record to draw conclusions regarding erosion. Kelly confirmed that the historical photos provided by Donna had been filed with FERC and are on the record.

Jason M. presented the study progress, applicable variances, and remaining activities on the Aquatic Resources study. Jack asked if Alabama Power was studying ways to modify temperatures to ensure a warm-water fishery. Jack added that flows and temperature should not be decoupled and that a CMF of colder water could hinder the fishery. Jason M. noted that Alabama Power is reviewing information that was submitted regarding temperature modifications at other hydropower projects. Jason M. added that the temperature regime of the Tallapoosa River has been well studied during the relicensing process and noted temperatures below Harris Dam are well within the required temperature range of target species presented in Auburn's report. Jason M. stated that the data shows the temperature regime of the river below Harris Dam is not much different from a warm-water fishery, as it averages over 20 degrees Celsius (°C) and closer to 25 °C at several locations downstream during the summer. Jason M. added that only a 2-3°C difference exists in portions of the year when compared to unregulated sites like Heflin or Newell; therefore, there does not appear to be a strong case for making a temperature modification. Jack stated that some of this information is in conflict with previous studies and ARA will file additional comments on temperature. Jimmy asked what the temperature difference is between the uppermost and lowest position of the skimmer weir. Jason M. noted that temperature at the lowest position had not been measured as the weir has been in the uppermost position since the early 2000s but speculated there would be a couple °C difference if the weir were lowered.

Jason M. presented the study progress, applicable variances, and remaining activities for the Downstream Aquatic Habitat (there were no stakeholder questions) and the Threatened and Endangered Species studies. Sarah noted that FERC requires licensees to specify timber management activities within the Project Boundary to perform their analysis on bat species. Sarah added that specific timber acreages of any tree removal activities as defined by the U.S. Fish and Wildlife Service (USFWS) are needed for the Streamlined Consultation regarding the Northern Long-eared Bat (*Myotis septentrionalis*) and asked if that information would be provided with the PLP. Angie responded that Alabama Power has been consulting with the USFWS on what is needed for consultation and is currently working on the Draft Wildlife Management Plan (WMP). Keith confirmed that timber management practices that are protective of bat species are currently being finalized with the USFWS. Angie added that the WMP will be filed in November 2021 with the FLA. Jason M. noted that the range of the Indiana Bat (*Myotis sodalist*) overlaps with the range of the Northern-Long eared Bat and the USFWS did not recommend Streamlined Consultation. Evan Collins (USFWS) suggested an additional meeting with FERC regarding Endangered Species Act (ESA) consultation. Evan noted there are three bat species likely to occur within the Project Boundary. Evan added that Streamlined Consultation is available to use for the Northern Long-eared Bat, but it would not address the effects to the Indiana Bat. Evan added that USFWS is working with Alabama Power on a more

programmatic approach to managing timber for bats, reviewing areas of timber harvest as they are proposed over time. Sarah noted that FERC's federal action is issuing the license and T&E species issues need to be addressed in the license order. Regarding Alabama Power's proposed land classifications at Lake Harris, Sarah noted that there are not any distinguishing polygons in the GIS data within the natural areas that show areas of timber management. Sarah requested that Alabama Power's timber harvest estimates need to be on the record.

Tina presented the study progress, applicable variances, and remaining activities for the Project Lands Evaluation study. Ken Wills (Alabama Glade Conservation Coalition) asked if the original 20-acre botanical inventory report at Flat Rock Park was previously filed as a final report. Tina confirmed and noted that it was filed as an appendix to the *Phase 1 Project Lands Evaluation Study Report* in October 2020. Ken asked if the WMP would be available for additional review. Tina confirmed that Alabama Power is currently working with resource agencies on details of the WMP and it would be presented to the Harris Action Team 4 (HAT) prior to being filed with FERC in November 2021. Angie confirmed the WMP would be distributed for review and Alabama Power would hold a HAT 4 meeting prior to filing the WMP. Sarah requested the draft WMP be filed with the PLP by July 3, 2021 so that stakeholder comments could be incorporated prior to the FLA.

Amanda Fleming (Alabama Power) presented the study progress, applicable variances, and remaining activities on the Recreation study. Donna stated that there is only one public swimming area/day-use park on the reservoir and asked for additional information on Alabama Power's plan regarding new recreation sites. Amanda clarified that the Recreation Evaluation Study Report did not include this information and the Protection, Mitigation, and Enhancement (PME) measures (such as new recreation sites) will be presented in the PLP. Angie confirmed that Alabama Power has identified the need for an additional day-use park on the reservoir and it will be part of Alabama Power's proposal.

Amanda presented the study progress, applicable variances, and remaining activities on the Cultural Resources study. Regarding the downstream release alternatives and the operating curve alternatives, Rachel McNamara (FERC) asked if the location of the known cultural resources (19 sites downstream and 96 on Lake Harris) would be provided to HAT 6. Amanda requested that Rachel file written comments of her request. Rachel added it would be helpful to know which cultural resources were potentially being affected. Amanda clarified that the 19 sites downstream that were determined from the Alabama State Site File and not further analyzed, but the 96 sites around Lake Harris will be presented in the eligibility assessments.

Bryant Celestine (Alabama Coushatta Tribe of Texas) apologized for not previously participating in HAT 6 meetings thus far and asked if the Traditional Cultural Properties (TCP) invitation could be extended. Amanda stated that the TCP process is near completion with the Muscogee (Creek) Nation. Bryant stated the invitation to conduct TCP should not be concluded and noted a concern that the general area may contain archaeological sites that link the Alabama Coushatta Tribe of Texas to the Muscogee (Creek) Nation. Bryant added that the Coushatta Tribe of Louisiana and the Alabama-Quassarte Tribal Town of Oklahoma would likely have an interest in participating in the TCP process. Amanda requested Bryant to submit a written comment regarding his request. Maria Clark (Environmental Protection Agency (EPA)) encouraged Alabama Power to allow the Coushatta Tribe of Texas to participate in the TCP process.

Kelly asked participants for any additional questions. Regarding pre-evacuation of the reservoir in the case of a forecasted rain, Barry asked how long it would take, and at what flow, to lower the lake one to two feet. Alabama Power was not sure and requested Barry to file a written comment. Jack asked when the HEC-RAS and HEC-ResSim models and associated outputs would be available to stakeholders. Kelly noted these would be filed with the FLA to include any additional modeling that may be required based on comments from the draft operating reports. Jack stated that the models or at least some of the outputs would be helpful to have sooner to provide comments on the draft BESS report. Kelly requested this be further discussed in the upcoming HAT 1 meeting on May 6, 2021. Jack asked for an extension of the comment period of the draft operating reports. Kelly asked if Alabama Power could get back with stakeholders on this request[3]. Ken clarified that the comment period is only related to the draft operating reports and not the final study reports. Angie confirmed and added that stakeholders will have until June 11, 2021 to comment on the USR meeting summary.

Microsoft Teams Chat Questions and Responses:

- Jimmy Traylor: What is the inflow from The Little Tallapoosa River?
    - Jason Moak: Average annual flow in Little Tallapoosa River at USGS Newell gauge is 573 cfs based on 1976-2020 period of record.

- Donna Matthews: I, too, wonder what the interaction between Army Corp and dam operations is and why they are not participating.
    - Kelly Schaeffer: The USACE has been participating in this relicensing process. They attended the HAT 1 meetings on April 1, 2021.

- Donna Matthews: How many of the original 20 Level loggers remain in place. Do they continue to generate data? Where is that data available for viewing?
    - Colin Dinken (Kleinschmidt): All of those loggers were removed after May 2020 after they had gathered one year of continuous data. *15-minute data continuously for one year.

[3] Alabama Power provided stakeholders an additional 15-day comment period with comments due on May 26, 2021 on the Draft *Downstream Release Alternatives Phase 2 Study Report*, Draft *Operating Curve Change Feasibility Analysis Phase 2 Study Report*, and Draft *Battery Energy Storage System at R.L. Harris Project Report.*