

November 8, 2012

we energies



800 Industrial Park Drive
Iron Mountain, MI 49801
Tel 906.779.2400
www.we-energies.com

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

Dear Ms. Bose:

**RE: BRULE HYDROELECTRIC PROJECT (FERC NO. 2431)
ARTICLE 405 – WATER QUALITY – LICENSE AMENDMENT REQUEST**

Wisconsin Electric Power Company, doing business as We Energies, is hereby requesting to amend Article 405 for the Brule Hydroelectric Project, FERC No. 2431. Article 405 outlines the Water Quality Monitoring Plan (Plan) for this project.

Water quality for the project has been monitored per the Plan for over 15 years and no water quality issues have been found. In the interest of reducing workload and freeing up Licensee and Agency time to focus on other more critical ongoing license implementation tasks, We Energies is requesting amendment of Article 405 to discontinue all continuous water quality monitoring at the Brule project. This topic had been discussed at a variety of license implementation meetings over the past 2 years. A formal request was sent to the Agencies via email on June 5th, 2012 (see attached). The request was discussed and all agreed to discontinue water quality monitoring during a meeting at We Energies on June 27th, 2012. This agreement is documented via the attached "Consultation Completion Form". This form was developed to more succinctly capture agreement resulting from consultation.

During the June 27th, 2012, consultation meeting WDNR requested that when the project is relicensed, or if significant changes in operation at the plant were to occur, the existing water quality plan would be revisited and revised as needed to deal with these events. Until that time water quality monitoring could be discontinued. All agreed this was reasonable.

Please call me at (906) 779-4099, if you have questions on this request.

Sincerely,

A handwritten signature in blue ink that reads "Todd Jastremski".

Todd Jastremski, Manager
Hydroelectric Operations Division

Enclosures

cc: Mr. Michael Donofrio – WDNR
Ms. Cheryl Laatsch – WDNR
Mr. Kyle Kruger – MDNR
Mr. Nicholas Utrup – USFWS

Consultation Completion Form

To be filed with requests for FERC license amendments. Signature on form represents concurrence with issue proposed for amendment and the corresponding amendment of the applicable sections of the Wilderness Shores Settlement Agreement.

FERC Project No. : 2431 Date: 6-27-2012

FERC Project Name: BRULE

FERC License Article for Proposed Amendment: 405

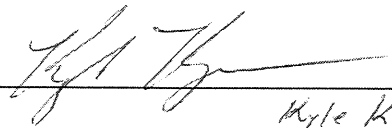
Consultation Issue: DISCONTINUE WATER QUALITY MONITORING

Consultation required with (check those that apply):

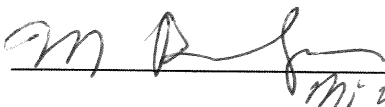
X = Consultation required per license article

✓ = Consultation desirable / supplemental

X	MDNR	X	WDNR
X	USFWS		NPS
	MHRC		RAW
	MDEQ	X	WEPCO



 Kyle Kruger
 Michigan Department of Natural Resources



 Michael Donato
 Wisconsin Department of Natural Resources



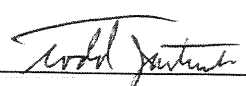
 Nicholas J. Utrup
 U.S. Fish & Wildlife Service

 National Park Service

 Michigan Hydro Relicensing Coalition

 River Alliance of Wisconsin

 Michigan Department of Environmental Quality



 Todd Jastranski
 Wisconsin Electric Power Co. dba We Energies

Gunville.Kristi

From: Jastremski.Todd
Sent: Tuesday, June 05, 2012 7:41 AM
To: 'Donofrio, Michael C - DNR'; Nick_Utrup@fws.gov; Cheryl Laatsch (Cheryl.laatsch@wisconsin.gov); 'Kruger, Kyle (DNR)'
Cc: Gunville.Kristi
Subject: Bule Hydroelectric Project FERC No. 2431 - Request for Amendment to License Article 405
Attachments: BRL.II.F.1.1.pdf; BRL.II.F.1.4.pdf; BRL.II.F.1.6.pdf; BRL.II.F.1.13.pdf; Brule 1997 1998 2002 2007 Summary.xlsm
Importance: High

We Energies is requesting the modification of Article 405 of our FERC license, which covers our Water Quality Monitoring Plan, to discontinue all continuous monitoring at the Brule project. This was discussed during the roundtable at our 7-28-2011 MEF meeting and MDNR, WDNR and USFWS were open to considering it at that time.

Justification for this request is as follows:

- 1) The intent of the testing was to show that water quality would not be affected at the Brule project as it moved from a peaking operation to a run-of-river operation. The project has been successfully operated as run-of-river for over 15 years and has not caused any water quality issues during that time.
- 2) Significant data was collected in 1990, 1993, 1994, 1995, 1997, 1998, 2002, & 2007 and shows compliance to the DO and temperature standards set for water quality.
- 3) The FERC has been strongly encouraging licensees to simplify the conditions on mature licenses. This testing was put in place to measure impacts of changes in how the project is operated. Enough data has been collected to show that the project has no undesirable water quality impacts with respect to the data collected in the original plan.
- 4) Reduce workload and allow all parties to focus on the issues that are more important for each project at this stage in the life of the license.

To support this request and to provide easy access to the background information I have attached the following:

- 1) Article 405 of our FERC license (doc.1).
- 2) We Energies' final water quality monitoring plan (doc .4).
- 3) FERC's approval of the plan and an order amending the schedule for data collection to make it concurrent with our Pine project (doc .6 & 13). Note that discontinuing continuous water quality monitoring at our Pine project has already been approved by WDNR & USFWS.
- 4) A spreadsheet that summarizes the data collected in 1997, 1998, 2002, & 2007 which is the data collected since approval of the final plan.

Please review and indicate your concurrence with my request by July 6th, 2012.

Please call or email anytime with questions or concerns.

Sincerely,

Todd Jastremski

Manager - Hydroelectric Operations
We Energies
800 Industrial Park Drive
Iron Mountain, MI 49801
Phone: (906) 779-4099

Fax: (906) 779-2488

email: todd.jastremski@we-energies.com

Kristi – Please CIMS file as “BRL.II.F.1.17 WA – Request to Agencies for Article 405 amendment”. Only the spreadsheet needs to be .pdf'd and attached to the CIMS filing.

Brule Hydro Plant - 1997, 1998, 2002 and 2007 Data Summary

Brule Tailrace - 1997 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	18.4	22.3	14.1	7.9	9.4	6.4	86	96	72
Jul	744	25.8	22.8	17.9	7.1	7.9	5.8	81	90	68
Aug	744	19.3	22.7	16.4	7.6	9.0	6.4	83	98	73
Sep	720	15.9	17.8	13.9	8.2	8.6	7.4	85	92	76

Brule Tailrace - 1998 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	17.7	23.8	13.4	7.9	9.1	6.3	84	95	73
Jul	744	22.2	24.4	20.5	6.6	7.7	5.5	78	91	66
Aug	744	21.6	22.9	20.9	7.0	7.9	5.9	81	95	68
Sep	519	19.0	21.3	17.3	7.3	8.4	5.7	82	94	62

Brule Tailrace - 2002 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	18.4	23.6	15.7	7.8	8.8	6.5	85	96	76
Jul	744	25.8	25.8	22.5	6.3	7.2	5.6	76	86	67
Aug	744	21.0	24.3	19.2	6.9	7.9	5.8	78	86	66
Sep	720	18.0	21.8	11.9	7.9	9.7	7.0	83	92	77

Brule Tailrace - 2007 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	20.8	24.4	17.7	7.1	8.0	6.3	81	89	72
Jul	744	22.4	25.2	20.2	6.9	8.0	4.81	81	94	54
Aug	744	22.3	25.7	19.7	6.6	8.2	4.98	79	94	56
Sep	720	17.9	22.3	14.7	7.7	9.1	5.9	82	98	64

D.O. dropped below 5.0 four times, all between 7/31 @2100 and 8/1 @0100. The plant did not run from 7/30 @1500 to 8/1 @1200 as the intake barrier net was being cleaned.

Brule Hydro Plant - 1997, 1998, 2002 and 2007 Data Summary

Brule Upstream (Former Gauging Station) - 1997 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	18.3	25.0	12.3	8.6	10.2	6.5	93	114	76
Jul	744	19.5	25.6	13.0	8.4	10.0	6.6	93	110	77
Aug	744	16.9	24.9	12.4	8.8	10.8	7.5	92	114	76
Sep	720	14.3	19.2	9.4	9.3	11.0	8.1	93	111	81

Brule Upstream (Former Gauging Station) - 1998 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	531	16.3	25.6	9.8	9.2	11.0	7.4	95	111	83
Jul	744	20.6	27.5	15.1	8.2	9.7	6.5	94	116	77
Aug	744	19.6	24.9	13.7	8.2	9.8	6.4	91	112	72
Sep	720	15.7	22.1	8.4	9.1	11.7	6.9	94	114	78

Brule Upstream (Former Gauging Station) - 2002 Data Summary

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	18.0	26.9	10.8	8.7	10.5	6.9	94	107	84
Jul	744	22.3	28.8	16.8	7.9	10.6	5.7	92	123	69
Aug	744	19.2	24.4	14.5	8.2	10.3	6.6	89	112	72
Sep	720	15.3	23.3	8.4	9.1	10.9	6.8	90	110	74

Brule Upstream Station (Former Gauging Station) - 2007 Data Summary (Using all data)

Month	OBS	Temperature (Degrees C)			Dissolved Oxygen			DO % Saturation		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	20.3	27.8	12.5	8.28	9.97	6.35	93	115	77
Jul	744	21.3	28.3	14.9	8.44	10.49	6.57	97	122	79
Aug	744	20.1	28.2	13.5	7.63	13.29	3.65	87	149	44
Sep	717	15.8	24.7	7.5	9.15	12.16	3.85	93	116	43

8/22 @1800 to 9/05 @1700 - During this two week deployment period, we experienced a problem with filamentous algae wrapping around the sonde stirrer, pushing it up into the O₂ membrane. It appears as if two different interferences occurred. First, wound up filamentous algae pressed against the O₂ sensor membrane, affecting readings. Secondly, the filamentous algae moved the stirrer up into the O₂ sensor membrane, scratching and eventually puncturing the membrane, also affecting the readings..

99.9% Recovery - 8/23/07 - 3 hours (1100, 1200 & 1300) of bad data deleted.

Brule Upstream Station (Former Gauging Station) - 2007 Data Summary (Excluding 8/22-9/5 data)

Month	OBS	Temperature (Degrees C)			DO % Saturation			Dissolved Oxygen		
		Mean	Max	Min	Mean	Max	Min	Mean	Max	Min
Jun	720	20.3	27.8	12.5	92.7	115.3	76.5	8.28	9.97	6.35
Jul	744	21.3	28.3	14.9	96.8	121.7	79.0	8.44	10.49	6.57
Aug	525	20.6	28.2	13.5	87.7	124.0	63.1	7.61	9.99	5.84
Sep	604	15.1	24.5	7.5	96.0	116.1	81.7	9.54	12.16	7.51

This summary table shows the Brule upstream data excluding the data between 8/22 @1800 to 9/05 @1700 when we experienced a problem with filamentous algae as noted above.

88.6% Recovery

Document Content(s)

BRL II F 1 18 (2).PDF.....1-6