



**We Energies**  
 800 Industrial Park Drive  
 Iron Mountain, MI 49801

www.we-energies.com

December 21, 2016

Ms. Kimberly D. Bose, Secretary  
 Federal Energy Regulatory Commission  
 Division of Licensing and Compliance  
 888 First Street NE  
 Washington, DC 20426

Dear Ms. Bose:

**SUBJECT: Request for Extension of Time – 2016 Water Chemistry Sampling**

**Wilderness Shores Settlement Agreement (WSSA) Projects**

<b>Way</b>	<b>FERC P-1759</b>	<b>Article 409</b>
<b>Hemlock Falls</b>	<b>FERC P-2074</b>	<b>Article 408</b>
<b>Lower Paint</b>	<b>FERC P-2072</b>	<b>Article 407</b>
<b>Peavy Falls</b>	<b>FERC P-11830</b>	<b>Article 407</b>
<b>Michigamme Falls</b>	<b>FERC P-2073</b>	<b>Article 408</b>
<b>Twin Falls</b>	<b>FERC P-11831</b>	<b>Article 408</b>
<b>Kingsford</b>	<b>FERC P-2131</b>	<b>Article 408</b>
<b>Big Quinnesec Falls</b>	<b>FERC P-1980</b>	<b>Article 409</b>

Wisconsin Electric Power Company, dba We Energies, is hereby requesting an extension of time until December 1, 2017 to file the results of quarterly water chemistry sampling for the projects noted above. The report is due on January 1, 2017 per our licenses.

**Background:** The water quality monitoring plan for the WSSA projects has been modified several times since inception in 2001. The current version was approved by the FERC on July 26, 2004 and covers the requirement for 5 year tailrace water chemistry sampling at the 8 WSSA projects.

**History:** The last filing for this work was submitted on December 13, 2012. This was nearly a year late. The sampling work was completed on time in 2011 in accordance with our license articles, but due to an error in our compliance tracking system, the actual filing was late.

**Current Situation:** Sadly another compliance tracking system issue is the reason for our extension of time request. This time the system had a task for collecting the quarterly data and a separate one for year-end reporting of the results, however, the error was that the tasks were only assigned to me as the department manager and not to the various support staff that actually perform the field work. It is my error that I did not include the support staff on the data collection task such that the field work would have been completed. They didn't know it was due so didn't plan to complete it.

Ms. Kimberly Bose  
Page 2  
December 21, 2016

**Plan to Mitigate Error:** Instead of pushing all of the sampling work out 1 year, we are conducting the 4<sup>th</sup> quarter chemistry sampling today. We propose to complete the rest of the sampling in May, July, and October of 2017. The requested December 1, 2017 filing date allows for laboratory time to complete the chemistry analysis on samples.

**Looking Forward:** We have informally begun consultation with agency stakeholders regarding the usefulness of the data collected and the need to collect this data in the future. We will formalize this consultation in 2017 and make a decision to continue status quo, modify, or discontinue. A minor license plan amendment request will be submitted as appropriate depending on the outcome of these discussions. At a minimum, we will be requesting an extension of the filing date to March 1 of the year following sampling in order to allow laboratory processing of the December samples.

Please call me at (906) 779-4099 if you have any questions concerning this filing.

Sincerely,



Todd P. Jastremski  
Asset Manager Hydro Operations

cc: Elle Gulotty – MDNR  
Nicholas Utrup – FWS  
Cheryl Laatsch – WDNR  
John Zygaj – FERC CRO  
Mike Grisar – We Energies

Document Content(s)

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