



CITY OF ANN ARBOR, MICHIGAN

Public Services Area/Water Treatment

919 Sunset Road

Ann Arbor, Michigan 48103

Web: www.a2gov.org Printed on recycled paper

August 31, 2012

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Mail Code: DHAC, PJ-12.7
888 First Street, NE
Washington, DC 20426

**RE: Compliance with Run-of-River Operation
Barton Dam, FERC Project No. 3142**

Please find the following responses to the August 2, 2012 letter to the City regarding compliance with run-of-river operation.

- 1) Provide monthly monitoring reports for April through June 2012 as required by paragraph (B) of the Order Modifying and Approving Run-of-River Flow Compliance Plan

Since the City did not receive the October 24, 2011 Order Modifying and Approving Run-of-River Flow Compliance Plan until August 13, 2012, the City has not generated the monthly monitoring reports identified in the order and is therefore unable to provide them as this data was not being saved historically. The Order identifies providing hourly records of outflow, spillway gate openings, power generation, and head pond level. Since receipt of the Order on August 13, the City has put into place hourly data collection for outflow, power generation and head pond level, as these items are monitored in the City's SCADA system. One of the items requested to be tracked, spillway gate openings, is not available in the City's SCADA system and therefore it is not possible to provide hourly data for this item. Attached to this letter is a sample of the data that we have collected since receipt of the Order.

In review of the October 24, 2011 Order, the City has identified several components for which compliance is currently not possible. As indicated above, the City is not able to trend the gate positions. The gate position information is captured locally at the dam and processed by a PLC at the site with the newly developed calibration curves to generate a total flow number that is passing the dam. Therefore, the total flow passing the dam and the gate positions are based on the same data, just different units. Because this information is redundant, the City does not understand the need and benefit to providing both flow data and gate position. The other item from the Order for which compliance is currently not possible is the provision of real-time flow data to the public electronically. The flow data is currently totalized in the City's SCADA system which operates on a secure server. The City does not currently have the capability of allowing public access to this flow data without jeopardizing the security of the City's Water Treatment Plant's control system.

- 2) Provide monitoring reports for the period July 25 through 31, 2012 which include daily headpond and tailwater elevations, flows through the project, and turbine operations

See response to Item 1) above. We have added tailwater elevation to the data requested from the order and will be providing that information as part of future monthly reports.

- 3) Provide identification of the days and circumstances when the project was not operated in a run-of-river mode

During the period between July 23 and July 27, river flow dropped below the low flow set point for control at Barton Dam causing the pond level to drop approximately 0.15 feet below the normal pond level range. The low flow set point for Barton is 100 CFS per the City's exemption. Once determining that we were not able to operate at 100 CFS and maintain the pond within its normal limits, the City reduced the low flow set point to 50 CFS to allow the pond to recover. During this period the dam was not operating in true run-of-river mode as we were trying to recover the pond level slowly to get back into its normal range.

- 4) Provide a description of any adverse environmental impacts that you have observed or may have occurred as a result of any noncompliance during that period

We did not detect any adverse environmental impacts associated with this period where the dam was not operating in run-of-river mode.

- 5) Provide any actions that you have taken or propose to take in order to ensure future compliance with the requirement of your exemption

We reduced the low flow set point to accommodate future low flow conditions in the river.

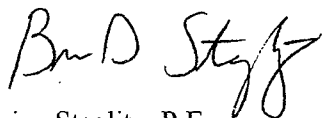
General Comments

In addition to the responses identified above, the City would like to remind FERC that it submitted its final gate calibration data and plan to FERC on January 11, 2012. The City has not received a response from FERC on this submittal indicating its acceptance of its run-of-river plan, and is still waiting for concurrence with the plan submitted. Note that as a precondition to this submittal, the plan and data was reviewed and accepted by the US Fish and Wildlife Service. The US Fish and Wildlife Service's response was attached to the January 11, 2012 submittal to FERC.

The City intends to summarize its proposed changes to the Order and share with the Michigan DNR and US Fish and Wildlife Service for their review and acceptance and then issue a request for an Amendment to the Order to FERC.

If you have any questions or require clarifications on the responses provided in this letter, please do not hesitate to contact me bsteglitz@a2gov.org or (734) 794-6426, ext. 43905.

Sincerely,



Brian Steglitz, P.E.
Sr. Utilities Engineer
City of Ann Arbor Water Treatment Plant

| TMDT | Barton Pond Elev. | Barton Dam Tail Elev. | Barton Dam CFS | Barton Hydro CFS | Barton Power (KW) |
|------------------|-------------------|-----------------------|----------------|------------------|-------------------|
| 8/21/12 11:00 AM | 797.00 | 773.16 | 0.00 | 194.93 | |
| 8/21/12 11:59 AM | 797.00 | 773.16 | 0.00 | 193.12 | |
| 8/21/12 1:00 PM | 797.01 | 773.14 | 0.00 | 213.51 | |
| 8/21/12 2:00 PM | 797.00 | 773.16 | 0.00 | 216.43 | |
| 8/21/12 3:00 PM | 797.00 | 773.17 | 0.00 | 219.34 | |
| 8/21/12 4:00 PM | 797.00 | 773.17 | 0.00 | 239.38 | |
| 8/21/12 5:00 PM | 796.99 | 773.16 | 0.00 | 202.58 | |
| 8/21/12 6:00 PM | 797.00 | 773.16 | 0.00 | 178.53 | |
| 8/21/12 7:00 PM | 797.00 | 773.16 | 0.00 | 166.50 | |
| 8/21/12 8:00 PM | 797.01 | 773.17 | 0.00 | 179.24 | |
| 8/21/12 9:00 PM | 797.01 | 773.18 | 0.00 | 235.36 | |
| 8/21/12 10:00 PM | 797.00 | 773.16 | 0.00 | 250.30 | |
| 8/21/12 11:00 PM | 797.00 | 773.17 | 0.00 | 253.97 | |
| 8/22/12 12:00 AM | 796.99 | 773.17 | 0.00 | 204.75 | |
| 8/22/12 1:00 AM | 797.00 | 773.15 | 0.00 | 170.52 | |
| 8/22/12 2:00 AM | 797.01 | 773.17 | 0.00 | 180.34 | |
| 8/22/12 3:00 AM | 797.01 | 773.17 | 0.00 | 209.49 | |
| 8/22/12 4:00 AM | 797.00 | 773.16 | 0.00 | 206.57 | |
| 8/22/12 5:00 AM | 797.00 | 773.16 | 0.00 | 207.32 | |
| 8/22/12 6:00 AM | 797.00 | 773.17 | 0.00 | 211.34 | |
| 8/22/12 7:00 AM | 797.00 | 773.18 | 0.00 | 191.27 | |
| 8/22/12 8:00 AM | 797.00 | 773.17 | 0.00 | 186.89 | |
| 8/22/12 9:00 AM | 797.00 | 773.17 | 0.00 | 185.47 | |
| 8/22/12 10:00 AM | 797.00 | 773.16 | 0.00 | 183.62 | |
| 8/22/12 11:00 AM | 797.00 | 773.17 | 0.00 | 184.36 | |
| 8/22/12 12:00 PM | 797.01 | 773.16 | 0.00 | 186.89 | |
| 8/22/12 1:00 PM | 797.01 | 773.17 | 0.00 | 194.93 | |
| 8/22/12 2:00 PM | 797.01 | 773.17 | 0.00 | 198.21 | |
| 8/22/12 3:00 PM | 797.00 | 773.20 | 0.00 | 203.29 | |
| 8/22/12 4:00 PM | 797.00 | 773.21 | 0.00 | 220.06 | |
| 8/22/12 5:00 PM | 797.00 | 773.20 | 0.00 | 195.64 | |
| 8/22/12 6:00 PM | 797.00 | 773.18 | 0.00 | 179.63 | |
| 8/22/12 7:00 PM | 797.00 | 773.20 | 0.00 | 178.17 | |
| 8/22/12 8:00 PM | 797.00 | 773.18 | 0.00 | 177.42 | |
| 8/22/12 9:00 PM | 797.01 | 773.24 | 0.00 | 176.36 | |
| 8/22/12 10:00 PM | 797.01 | 773.18 | 0.00 | 194.93 | |

| TMDT | Barton Pond Elev. | Barton Dam Tail Elev. | Barton Dam CFS | Barton Hydro CFS | Barton Power (KW) |
|------------------|-------------------|-----------------------|----------------|------------------|-------------------|
| 8/22/12 11:00 PM | 797.01 | 773.21 | 0.00 | 207.67 | |
| 8/23/12 12:00 AM | 797.01 | 773.18 | 0.00 | 208.42 | |
| 8/23/12 1:00 AM | 797.00 | 773.18 | 0.00 | 213.86 | |
| 8/23/12 2:00 AM | 797.00 | 773.18 | 0.00 | 175.61 | |
| 8/23/12 3:00 AM | 797.00 | 773.19 | 0.00 | 169.77 | |
| 8/23/12 4:00 AM | 797.00 | 773.19 | 0.00 | 176.71 | |
| 8/23/12 5:00 AM | 797.01 | 773.17 | 0.00 | 178.17 | |
| 8/23/12 6:00 AM | 797.00 | 773.18 | 0.00 | 183.26 | |
| 8/23/12 7:00 AM | 797.00 | 773.20 | 0.00 | 178.17 | |
| 8/23/12 8:00 AM | 797.00 | 773.10 | 0.00 | 178.53 | |
| 8/23/12 9:00 AM | 797.00 | 773.18 | 0.00 | 178.53 | |
| 8/23/12 10:00 AM | 797.00 | 773.14 | 0.00 | 179.63 | |
| 8/23/12 11:00 AM | 797.00 | 773.18 | 0.00 | 165.79 | |
| 8/23/12 12:00 PM | 797.00 | 773.16 | 0.00 | 172.69 | |
| 8/23/12 1:00 PM | 797.00 | 773.11 | 0.00 | 170.52 | |
| 8/23/12 2:00 PM | 797.00 | 773.13 | 0.00 | 167.60 | |
| 8/23/12 3:00 PM | 797.01 | 773.12 | 0.00 | 173.80 | |
| 8/23/12 4:00 PM | 797.01 | 773.13 | 0.00 | 171.23 | |
| 8/23/12 5:00 PM | 797.01 | 773.11 | 0.00 | 172.34 | |
| 8/23/12 6:00 PM | 797.01 | 773.14 | 0.00 | 171.59 | |
| 8/23/12 7:00 PM | 797.01 | 773.14 | 0.00 | 169.77 | |
| 8/23/12 8:00 PM | 797.00 | 773.14 | 0.00 | 173.80 | |
| 8/23/12 9:00 PM | 797.01 | 773.13 | 0.00 | 170.52 | |
| 8/23/12 10:00 PM | 797.01 | 773.14 | 0.00 | 170.52 | |
| 8/23/12 11:00 PM | 797.01 | 773.14 | 0.00 | 166.50 | |
| 8/24/12 12:00 AM | 797.01 | 773.15 | 0.00 | 167.60 | |
| 8/24/12 1:00 AM | 797.01 | 773.17 | 0.00 | 165.79 | |
| 8/24/12 2:00 AM | 797.01 | 773.15 | 0.00 | 163.58 | |
| 8/24/12 3:00 AM | 797.01 | 773.15 | 0.00 | 165.79 | |
| 8/24/12 4:00 AM | 797.01 | 773.16 | 0.00 | 164.69 | |
| 8/24/12 5:00 AM | 797.01 | 773.18 | 0.00 | 164.69 | |
| 8/24/12 6:00 AM | 797.00 | 773.22 | 0.00 | 162.48 | |
| 8/24/12 7:00 AM | 797.00 | 773.18 | 0.00 | 162.87 | |
| 8/24/12 8:00 AM | 797.00 | 773.19 | 0.00 | 193.47 | |
| 8/24/12 9:00 AM | 797.00 | 773.19 | 0.00 | 167.25 | |
| 8/24/12 10:00 AM | 797.01 | 773.19 | 0.00 | 168.32 | |

| TMDT | Barton Pond Elev. | Barton Dam Tail Elev. | Barton Dam CFS | Barton Hydro CFS | Barton Power (KW) |
|------------------|-------------------|-----------------------|----------------|------------------|-------------------|
| 8/24/12 11:00 AM | 797.01 | 773.19 | 0.00 | 186.18 | 235.00 |
| 8/24/12 12:00 PM | 797.01 | 773.20 | 0.00 | 199.67 | 243.72 |
| 8/24/12 1:00 PM | 797.01 | 773.19 | 0.00 | 163.94 | 248.23 |
| 8/24/12 2:00 PM | 797.01 | 773.20 | 0.00 | 167.60 | 255.73 |
| 8/24/12 3:00 PM | 797.01 | 773.19 | 0.00 | 173.44 | 259.87 |
| 8/24/12 4:00 PM | 797.00 | 773.18 | 0.00 | 200.38 | 252.36 |
| 8/24/12 5:00 PM | 797.01 | 773.19 | 0.00 | 165.79 | 214.50 |
| 8/24/12 6:00 PM | 797.01 | 773.20 | 0.00 | 173.80 | 217.87 |
| 8/24/12 7:00 PM | 797.01 | 773.20 | 0.00 | 174.51 | 224.97 |
| 8/24/12 8:00 PM | 797.01 | 773.19 | 0.00 | 174.51 | 223.87 |
| 8/24/12 9:00 PM | 797.02 | 773.20 | 0.00 | 197.46 | 243.72 |
| 8/24/12 10:00 PM | 797.01 | 773.19 | 0.00 | 199.67 | 248.99 |
| 8/24/12 11:00 PM | 797.01 | 773.20 | 0.00 | 166.14 | 256.47 |
| 8/25/12 12:00 AM | 797.00 | 773.20 | 0.00 | 173.80 | 248.99 |
| 8/25/12 1:00 AM | 797.01 | 773.18 | 0.00 | 159.21 | 199.11 |
| 8/25/12 2:00 AM | 797.01 | 773.19 | 0.00 | 151.55 | 199.85 |
| 8/25/12 3:00 AM | 797.01 | 773.21 | 0.00 | 138.46 | 182.96 |
| 8/25/12 4:00 AM | 797.01 | 773.21 | 0.00 | 113.66 | 154.84 |
| 8/25/12 5:00 AM | 797.01 | 773.22 | 0.00 | 126.04 | 143.23 |
| 8/25/12 6:00 AM | 797.01 | 773.21 | 0.00 | 125.33 | 138.72 |
| 8/25/12 7:00 AM | 797.01 | 773.19 | 0.00 | 126.43 | 146.23 |
| 8/25/12 8:00 AM | 797.01 | 773.25 | 0.00 | 121.31 | 134.22 |
| 8/25/12 9:00 AM | 797.01 | 772.99 | 0.00 | 100.92 | 113.60 |
| 8/25/12 10:00 AM | 796.83 | 772.94 | 0.00 | 94.73 | 104.23 |
| 8/25/12 11:00 AM | 796.86 | 772.94 | 0.00 | 89.99 | 108.73 |
| 8/25/12 12:00 PM | 797.01 | 772.96 | 0.00 | 94.73 | 106.09 |
| 8/25/12 1:00 PM | 797.01 | 772.93 | 0.00 | 94.73 | 112.87 |
| 8/25/12 2:00 PM | 797.01 | 772.91 | 0.00 | 95.44 | 108.00 |
| 8/25/12 3:00 PM | 797.01 | 772.95 | 0.00 | 97.64 | 108.73 |
| 8/25/12 4:00 PM | 797.01 | 772.92 | 0.00 | 98.71 | 116.24 |
| 8/25/12 5:00 PM | 797.02 | 772.89 | 0.00 | 98.36 | 112.87 |
| 8/25/12 6:00 PM | 797.02 | 772.90 | 0.00 | 97.64 | 106.09 |
| 8/25/12 7:00 PM | 797.02 | 772.90 | 0.00 | 98.36 | 115.47 |
| 8/25/12 8:00 PM | 797.02 | 772.85 | 0.00 | 96.54 | 114.74 |
| 8/25/12 9:00 PM | 797.02 | 772.85 | 0.00 | 124.23 | 143.60 |
| 8/25/12 10:00 PM | 796.95 | 772.85 | 0.00 | 123.16 | 134.99 |

| TMDT | Barton Pond Elev. | Barton Dam Tail Elev. | Barton Dam CFS | Barton Hydro CFS | Barton Power (KW) |
|------------------|-------------------|-----------------------|----------------|------------------|-------------------|
| 8/25/12 11:00 PM | 796.96 | 772.84 | 0.00 | 124.23 | 137.59 |
| 8/26/12 12:00 AM | 797.02 | 772.84 | 0.00 | 126.43 | 144.00 |
| 8/26/12 1:00 AM | 797.01 | 772.83 | 0.00 | 128.96 | 141.36 |
| 8/26/12 2:00 AM | 797.01 | 772.84 | 0.00 | 131.52 | 146.23 |
| 8/26/12 3:00 AM | 797.01 | 772.82 | 0.00 | 117.68 | 133.49 |
| 8/26/12 4:00 AM | 797.01 | 772.82 | 0.00 | 105.65 | 116.97 |
| 8/26/12 5:00 AM | 797.01 | 772.80 | 0.00 | 84.16 | 97.85 |
| 8/26/12 6:00 AM | 797.02 | 772.79 | 0.00 | 91.06 | 106.09 |
| 8/26/12 7:00 AM | 797.01 | 772.93 | 0.00 | 91.45 | 106.50 |
| 8/26/12 8:00 AM | 797.02 | 772.81 | 0.00 | 92.16 | 111.73 |
| 8/26/12 9:00 AM | 797.02 | 772.79 | 0.00 | 104.55 | 116.97 |
| 8/26/12 10:00 AM | 797.02 | 772.78 | 0.00 | 109.67 | 126.75 |
| 8/26/12 11:00 AM | 797.02 | 772.78 | 0.00 | 118.39 | 139.09 |
| 8/26/12 12:00 PM | 797.02 | 772.79 | 0.00 | 119.49 | 140.59 |
| 8/26/12 1:00 PM | 797.02 | 772.79 | 0.00 | 123.16 | 144.00 |
| 8/26/12 2:00 PM | 797.01 | 772.80 | 0.00 | 128.96 | 141.73 |
| 8/26/12 3:00 PM | 797.01 | 772.81 | 0.00 | 126.04 | 141.73 |
| 8/26/12 4:00 PM | 797.01 | 772.79 | 0.00 | 112.59 | 125.98 |
| 8/26/12 5:00 PM | 797.01 | 772.79 | 0.00 | 110.38 | 128.62 |
| 8/26/12 6:00 PM | 797.02 | 772.81 | 0.00 | 110.38 | 130.12 |
| 8/26/12 7:00 PM | 797.01 | 772.77 | 0.00 | 111.49 | 125.61 |
| 8/26/12 8:00 PM | 797.02 | 772.78 | 0.00 | 110.74 | 123.75 |
| 8/26/12 9:00 PM | 797.02 | 772.62 | 0.00 | 120.24 | 135.36 |
| 8/26/12 10:00 PM | 797.02 | 772.60 | 0.00 | 110.03 | 150.37 |
| 8/26/12 11:00 PM | 797.03 | 772.61 | 0.00 | 140.63 | 188.24 |
| 8/27/12 12:00 AM | 797.02 | 772.64 | 0.00 | 151.55 | 199.48 |
| 8/27/12 1:00 AM | 797.00 | 772.67 | 0.00 | 169.77 | 214.50 |
| 8/27/12 2:00 AM | 796.77 | 772.75 | 0.00 | 163.58 | 214.86 |
| 8/27/12 3:00 AM | 797.01 | 772.78 | 0.00 | 143.55 | 195.34 |
| 8/27/12 4:00 AM | 797.01 | 772.80 | 0.00 | 127.14 | 169.85 |
| 8/27/12 5:00 AM | 797.02 | 772.79 | 0.00 | 107.82 | 159.34 |
| 8/27/12 6:00 AM | 797.02 | 772.80 | 0.00 | 107.47 | 150.37 |
| 8/27/12 7:00 AM | 797.02 | 772.80 | 0.00 | 108.57 | 155.61 |
| 8/27/12 8:00 AM | 797.02 | 772.80 | 0.00 | 110.74 | 150.74 |
| 8/27/12 9:00 AM | 797.00 | 772.85 | 0.00 | 181.45 | 229.11 |
| 8/27/12 10:00 AM | 797.03 | 772.91 | 0.00 | 179.24 | 269.25 |

| TMDT | Barton Pond Elev. | Barton Dam Tail Elev. | Barton Dam CFS | Barton Hydro CFS | Barton Power (KW) |
|------------------|-------------------|-----------------------|----------------|------------------|-------------------|
| 8/27/12 11:00 AM | 797.02 | 773.00 | 0.00 | 211.69 | 299.97 |
| 8/27/12 12:00 PM | 797.01 | 772.99 | 0.00 | 197.46 | 251.59 |
| 8/27/12 1:00 PM | 797.00 | 772.98 | 0.00 | 116.58 | 160.11 |
| 8/27/12 2:00 PM | 797.01 | 772.97 | 0.00 | 121.70 | 138.72 |
| 8/27/12 3:00 PM | 797.02 | 772.93 | 0.00 | 111.49 | 131.62 |
| 8/27/12 4:00 PM | 797.03 | 772.92 | 0.00 | 112.20 | 165.35 |
| 8/27/12 5:00 PM | 797.03 | 772.91 | 0.00 | 157.39 | 203.99 |
| 8/27/12 6:00 PM | 797.03 | 772.98 | 0.00 | 172.34 | 254.96 |
| 8/27/12 7:00 PM | 797.02 | 772.99 | 0.00 | 186.18 | 236.98 |
| 8/27/12 8:00 PM | 797.01 | 772.97 | 0.00 | 139.17 | 185.60 |
| 8/27/12 9:00 PM | 797.01 | 772.95 | 0.00 | 113.66 | 163.12 |
| 8/27/12 10:00 PM | 796.97 | 773.00 | 0.00 | 125.68 | 145.87 |
| 8/27/12 11:00 PM | 797.03 | 772.98 | 0.00 | 107.11 | 148.47 |
| 8/28/12 12:00 AM | 797.03 | 773.00 | 0.00 | 133.69 | 177.36 |
| 8/28/12 1:00 AM | 797.03 | 772.98 | 0.00 | 159.56 | 203.22 |
| 8/28/12 2:00 AM | 797.00 | 772.98 | 0.00 | 160.66 | 204.72 |
| 8/28/12 3:00 AM | 796.96 | 772.97 | 0.00 | 132.27 | 180.36 |
| 8/28/12 4:00 AM | 797.02 | 772.97 | 0.00 | 126.43 | 177.36 |
| 8/28/12 5:00 AM | 796.98 | 772.98 | 0.00 | 127.14 | 173.99 |
| 8/28/12 6:00 AM | 797.00 | 772.98 | 0.00 | 128.60 | 173.99 |
| 8/28/12 7:00 AM | 796.98 | 772.97 | 0.00 | 129.35 | 178.50 |
| 8/28/12 8:00 AM | 797.02 | 772.96 | 0.00 | 125.33 | 177.36 |
| 8/28/12 9:00 AM | 797.03 | 772.96 | 0.00 | 124.23 | 173.22 |
| 8/28/12 10:00 AM | 797.03 | 772.96 | 0.00 | 128.96 | 173.59 |

Document Content(s)

Response to run of river compliance letter.PDF.....1-7