November 17, 2023

Via E-Filing

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Draft License Application for the Rocky Mountain Pumped Storage Hydroelectric Project (P-2725)

Dear Secretary Bose:

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), co-licensee for the existing Rocky Mountain Pumped Storage Hydroelectric Project, FERC No. 2725 (Rocky Mountain Project or Project), herein electronically files with the Federal Energy Regulatory Commission (FERC or Commission) a staff review copy of the Draft License Application for New License (DLA) for the relicensing of the Rocky Mountain Project. The original license expires December 31, 2026.

OPC has prepared this DLA according to the requirements of the Commission's regulations under the Traditional Licensing Process (TLP), which FERC approved for use by OPC on January 26, 2022. OPC is providing electronic copies of the DLA to relevant resource agencies, tribes, non-governmental organizations, and other potentially interested parties included on the attached stakeholder distribution list for review and written comment. In accordance with 18 C.F.R. § 16.8 (c)(5), written comments on the DLA are due within 90 days of the date of this filing (comments due February 15, 2024). Please direct comments on the content of the DLA to:

ATTN: Dr. Craig A. Jones
Vice President, EHS & Regulatory Affairs
Relicensing Project Manager
Craig.Jones@opc.com

The DLA will be available at FERC's eLibrary: https://elibrary.ferc.gov/eLibrary/search (reference docket number P-2725) and on the Rocky Mountain Project's relicensing website at https://opc.com/rockymountainrelicensing/. Additional electronic copies of the DLA are also available by request to Craig Jones at the email address below. Hard copies of the filing are available for inspection at OPC's Headquarters in Tucker, Georgia.

Along with this cover letter and attached distribution list, this filing consists of the following components:

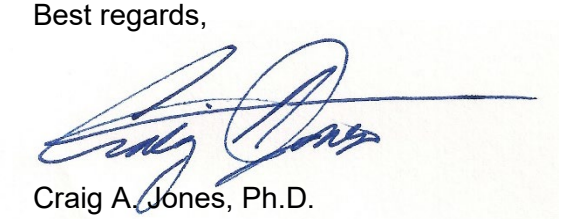
- Initial Statement
- Exhibit A – Project Description

- Exhibit B – Project Operations
- Exhibit C – Construction History
- Exhibit D – Statement of Cost and Financing
- Exhibit E – Environmental Report *(Archaeological Report and Protected Species Occurrence Map filed as Privileged)*
- Exhibit F – General Design Information *(CEII)*
- Exhibit G – Project Boundary Maps
- Exhibit H – Miscellaneous Filing Material

Due to the sensitive nature of the information contained in the Archaeological Report (included in Exhibit E), this report is being filed as privileged and is only being provided to the FERC, State and Tribal Historic Preservation Officers, and the Bureau of Indian Affairs. In addition, due to the sensitive nature of the information contained in the Protected Species Occurrence Map included in the Terrestrial and Wetlands Resources Survey Study Report, this information is only being provided to FERC, the Georgia Department of Natural Resources, and the US Fish and Wildlife Service. The information contained in Exhibit F qualifies as Critical Energy/Electric Infrastructure Information (CEII) as defined in 18 C.F.R. § 388.113(c) and has been removed from the public version of the DLA.

Please contact me at (770) 270-7348 or Craig.Jones@opc.com with any questions about this filing or if you need additional information.

Best regards,



Craig A. Jones, Ph.D.
Vice President, EHS & Regulatory Affairs

Attachment A Distribution List

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Georgia Power Company – Alan Peeples
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U.S. Bank National Association
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INITIAL STATEMENT

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION
Application for License for Major Project – Existing Dam
18 CFR §§ 4.51 and 4.32

18 CFR § 4.51(a)(1) Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) applies to the Federal Energy Regulatory Commission for a new license for the Rocky Mountain Pumped Storage Hydroelectric Project (Rocky Mountain Project), as described in the attached exhibits. The project number is P-2725.

18 CFR § 4.51(a)(2) The location of the project is:

State or territory: Georgia
County: Floyd
Township or nearby town: Rome
Stream or other waterbody: Heath Creek

18 CFR § 4.51(a)(3) The exact name and business address of the applicant are:

Oglethorpe Power Corporation (An Electric Membership Corporation)
2100 East Exchange Place
Tucker, Georgia 30084

The exact name and business address of each person authorized to act as agent for the applicant and this application are:[1]

Oglethorpe Power Corporation (An Electric Membership Corporation)
c/o Mr. Jeff Swartz
Senior Vice President of Plant Operations
2100 East Exchange Place
Tucker, Georgia 30084

18 CFR § 4.51(a)(4) The applicant is a domestic electric membership corporation and is not claiming preference under section 7(a) of the Federal Power Act.

[1] OPC, Georgia Power Company (GPC), Rocky Mountain Leasing Corporation, and U.S. Bank National Association (as owner trustee) are co-licensees for the Rocky Mountain Project. OPC owns a 74.61 percent undivided interest in the Project and GPC owns the remaining 25.39 percent undivided interest. The "Joint Participation Agreement" by and between OPC and GPC appoints OPC as agent with the sole authority and responsibility for, among other things, the planning, licensing, design, control, construction, maintenance, and disposal of the Project.

18 CFR § 4.51(a)(5)(i) The statutory or regulatory requirements of the state(s) in which the project is located that affect the project as proposed, with respect to bed and banks and to the appropriation, diversion, and use of water for power purposes, and with respect to the right to engage in the business of developing, transmitting, and distributing power and in any other business necessary to accomplish the purposes of the license under the Federal Power Act, are:

There are no special requirements in the State of Georgia pertaining to the operation of the project.

OPC has the land and water rights necessary to accomplish the purposes of the license under the Federal Power Act. Under the laws of the State of Georgia (see Georgia Code of 1933, Section 44-8-4), a corporation owning or controlling lands on both sides of any non-navigable stream as designated by the Georgia Code is authorized to construct and maintain a dam or dams, together with canals and appurtenances thereof, across the stream for the development of water power. The water rights are vested in the owner of the lands along the stream.

OPC is an electric membership corporation organized and existing under the laws of the State of Georgia and has, by its charter, the right to engage in the business of developing, transmitting, and distributing power and any other business necessary to accomplish the purposes of the license.

(ii) The steps which the applicant has taken or plans to take to comply with each of the laws cited above are:

There are no steps the applicant needs to take with regards to compliance with the Georgia Code as described above.

18 CFR § 4.51(a)(6) The applicant must provide the name and address of the owner of any existing project facilities. If the dam is federally owned or operated, provide the name of the agency.

OPC (together with Georgia Power as detailed below) owns all the project facilities at the Rocky Mountain Project. The mailing address is provided in reference to 18 CFR § 4.51(a)(3) above.

18 CFR § 4.32(a)(1) Identify every person, citizen, association of citizens, domestic corporation, municipality, or state that has or intends to obtain and will maintain any proprietary right necessary to construct, operate, or maintain the project.

OPC, Georgia Power Company (GPC), Rocky Mountain Leasing Corporation, and U.S. Bank National Association (as owner trustee) are co-licensees for the Rocky Mountain Project. OPC owns a 74.61 percent undivided interest in the Project and GPC owns the remaining 25.39 percent undivided interest. The "Joint Participation Agreement" by and between OPC and GPC appoints OPC as agent with the sole authority and responsibility for, among other things, the planning, licensing, design, control, construction, maintenance, and disposal of the Project.

18 CFR § 4.32(a)(2) Identify (providing names and mailing addresses):

(i) Every county in which any part of the project, and any Federal facilities that would be used by the project, would be located.

County	Contact	Mailing Address
Floyd County	Jamie McCord, County Manager	12 East 4th Avenue, Suite 210 Rome, GA 30161 706-291-5110 mccordj@floydcountyga.org

(ii) Every city, town, or similar local political subdivision:

(A) In which any part of the project, and any Federal facilities that would be used by the project, would be located.

The Rocky Mountain Project is not located within any city or town limits.

(B) That has a population of 5,000 or more people and is located within 15 miles of the project dam.

City/Town	Contact	Mailing Address
City of Rome (Floyd County)	Mayor Sundai Stevenson	601 Broad Street Rome, GA 30161 706-236-4400 sstevenson@romega.us
City of Summerville (Chattooga County)	Mayor Harry Harvey	120 Georgia Avenue Summerville, GA 30747 706-506-1892 hharvey@summervillega.org

(iii) Every irrigation district, drainage district, or similar special purpose political subdivision:

(A) In which any part of the project, and any Federal facilities that would be used by the project, would be located.

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(B) That owns, operates, maintains, or uses any project facilities or any Federal facilities that would be used by the project.

Political Subdivision	Contact	Mailing Address
Rocky Mountain Recreation and Public Fishing Area (PFA)	Dennis Shiley, Park Manager	Georgia Department of Natural Resources 4054 Big Texas Valley Road, NW Rome, GA 30165 706-802-5087 Dennis.Shiley@dnr.ga.gov

(iv) Every other political subdivision in the general area of the project that there is reason to believe would likely be interested in, or affected by, the application.

OPC knows of no other political subdivisions in the general area of the Rocky Mountain Project likely to be interested in, or affected by, the application.

(v) All Indian Tribes that may be affected by the project.

Note: There are no extant federally recognized tribal lands in the State of Georgia (U.S. Department of the Interior, 1993). There are, however, a number of federally recognized tribes that occupied the project region historically (Federal Register. Vol. 73, No. 66, April 4, 2008).

The following list includes Indian Tribes that may have an interest in the relicensing of the Rocky Mountain Project.

Indian Tribe	Contact	Mailing Address
Alabama-Coushatta Tribe of Texas	Tribal Council Chairwoman Cecilia Flores	Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, TX 77351
Alabama-Quassarte Tribal Town	Chief Nelson Harjo	Alabama-Quassarte Tribal Town P.O. Box 187 Wetumka, OK 74883
Cherokee Nation	Principal Chief Chuck Hoskin, Jr.	Cherokee Nation P.O. Box 948 Tahlequah, OK 74465-0948
Coushatta Tribe of Louisiana	Tribal Chairman David Sickey	Coushatta Tribe of Louisiana P.O. Box 818 Elton, LA 70532
Eastern Band of Cherokee Indians	Principal Chief Richard Sneed	Eastern Band of Cherokee Indians P.O. Box 1927 Cherokee, NC 28719
Kialegee Tribal Town	Town King Brian Givens	Kialegee Tribal Town P.O. Box 332 Wetumka, OK 74883-0332
Muscogee (Creek) Nation	Principal Chief David Hill	Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447
Seminole Nation of Oklahoma	THPO Theodore Isham	Seminole Nation of Oklahoma P.O. Box 1498 Wewoka, OK 74884
Seminole Tribe of Florida	Chairman Marcellus Osceola, Jr.	Seminole Tribe of Florida 6300 Stirling Road Hollywood, FL 33024
Thlopthlocco Tribal Town	Town King Ryan Morrow	Thlopthlocco Tribal Town P.O. Box 188 Okemah, OK 74859
United Keetoowah Band of Cherokee	Chief Joe Bunch	United Keetoowah Band of Cherokee P.O. Box 746 Tahlequah, OK 74465

18 CFR § 4.32(a)(3)(i) For a license (other than a license under section 15 of the Federal Power Act) state that the applicant has made, either at the time of or before filing the application, a good faith effort to give notification by certified mail of the filing of the application to:

> **(A)** Every property owner of record of any interest in the property within the bounds of the project, or in the case of the project without a specific boundary, each such owner of property which would underlie or be adjacent to any project works including any impoundments; and
>
> **(B)** The entities identified in paragraph (a)(2) of this section, as well as any other Federal, state, municipal or other local government agencies that there is reason to believe would likely be interested in or affected by such application.
>
> Not applicable, as this application is being provided pursuant to section 15 of the Federal Power Act.

18 CFR § 4.32(a)(4)(i) As to any facts alleged in the application or other materials filed, be subscribed and verified under oath in the form set forth in paragraph (a)(4)(ii) of this section by the person filing, an officer thereof, or other person having knowledge of the matters set forth. If the subscription and verification is by anyone other than the person filing or an officer thereof, it shall include a statement of the reasons therefore.

> Verification is provided on the following page.

VERIFICATION
(To be signed in Final Application)

18 CFR § 4.32(a)(4)(ii) This application is executed in the:

State of: Georgia
County of: Floyd
By:
Name: Mr. Jeff Swartz
Address: Oglethorpe Power Corporation (An Electric Membership Corporation)
2100 East Exchange Place
Tucker, Georgia 30084

being duly sworn, deposes and says that the contents of this application are true to the best of his knowledge or belief. The undersigned Applicant has signed the application this _____ day of _____, 2024.

(Applicant) _____

By: _____

Subscribed and sworn to before me, a Notary Public of the State of Georgia, this _____ day of _____, 2024.

/SEAL

Exhibit A

Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW

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Appendix A Project Location Map and Project Facilities Map

ACRONYMS

A	
ac-ft	acre-feet
C	
cfs	cubic feet per second
F	
FERC	Federal Energy Regulatory Commission
ft	feet
I	
ITS	Integrated Transmission System
K	
kV	kilovolt
M	
MSL	mean sea level
MW	megawatt
O	
OPC	Oglethorpe Power Corporation
Q	
Qty	Quantity

1.0 INTRODUCTION

Oglethorpe Power Corporation (OPC), Georgia Power Company (GPC), Rocky Mountain Leasing Corporation, and U.S. Bank National Association (as owner trustee) are co-licensees for the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project or Project). OPC owns a 74.61 percent undivided interest in the Project and GPC owns the remaining 25.39 percent undivided interest. The Rocky Mountain Project is in Floyd County, Georgia approximately 10 miles northwest of the city of Rome. The 904-megawatt (MW) Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on the Lower Reservoir. The Project does not occupy any federal lands.

Exhibit A was prepared in accordance with Federal Energy Regulatory Commission (FERC) regulations for a major project with existing dam at 18 CFR § 4.51(b). Appendix A of Exhibit A provides a location map and facilities map of the Project.

2.0 EXISTING STRUCTURES

2.1 Dams

2.1.1 Upper Reservoir Dam and Spillway

The Upper Reservoir Dam is a 12,895-foot-long earth and rockfill ring embankment that circumscribes the natural concave top of Rock Mountain with a maximum height of approximately 120 feet based on the terrain (Table 1). The dam is a multiple zoned embankment with a low permeability core, upstream and downstream filter zones, and outer rock fill shells. The upstream and downstream shells are separated from the core by a transition zone of clean rock and layers of filter and drain material. The internal seepage of the Upper Reservoir embankment flows to a pipe drain system located at the base of the chimney drain in the coarse filter material. Finger collector drains control seepage, while weirs placed downstream of the drains monitor the quantity of seepage. The Upper Reservoir Dam is classified as high hazard.

Table 1 Engineering Data for Upper Reservoir Dam and Spillway

Year Dam Completed	1995	Referenced Datum	NGVD29
Dam Type 1	Earth	Datum Conversion	NA
Dam Type 2	Rockfill	Storage Normal (ac-ft)	10800
Dam Height (ft)	90	Zero Freeboard Capacity (cfs)	13000
Spillway Width (ft)	140	Drainage Area (Square Miles)	0.3
Nominal Dam Crest Elevation (ft)	1401	100- Year Flood Flow (cfs)	NA
Lowest Elevation of Embankment (ft)	1397	IDF Outflow (cfs)	NA
Normal Pool Elevation (ft)	1392	PMF Outflow (cfs)	NA
Spillway Crest Elevation (ft)	1390	Flood Of Record Flow (cfs)	NA
Normal Freeboard (ft)	5	Flood Of Record Date	NA
		Foundation Type	Rock and Soil
		PGA (1:2475)	0.20g

2.1.2 Main Dam and Spillway

The Main Dam on Heath Creek is a combination of an earth and rockfill embankment type dam with an impervious core and a concrete gravity type dam that contains a gated

spillway with two Tainter gates, a 10-inch jet flow gate, a 40-inch jet flow gate, and a minimum flow outlet and a south abutment cut off structure. The Main Dam, along with Dams A and B, impound Heath Creek to form the Lower Reservoir. The Lower Reservoir backs upstream to Dams D, E, F, and G, which form the Auxiliary Pools and confine the Lower Reservoir downstream. Engineering data for the Main Dam is included in Table 2. The Main Dam is classified as high hazard.

Table 2 Engineering Data for Main Dam and Spillway

Year Dam Completed	1993	Referenced Datum	NGVD29
Dam Type 1	Gravity	Datum Conversion	NA
Dam Type 2	Concrete	Storage Normal (ac-ft)	19880
Dam Height (ft)	80	Zero Freeboard Capacity (cfs)	26500
Spillway Width (ft)	53	Drainage Area (Square Miles)	26
Nominal Dam Crest Elevation (ft)	720	100-Year Flood Flow (cfs)	2052
IDF Outflow (cfs)		24940	
Lowest Elevation of Embankment (ft)	720	PMF Outflow (cfs)	24940
Normal Pool Elevation (ft)	710.5	Flood Of Record Flow (cfs)	3542
Gated Spillway Crest Elevation (ft)	690.0	Flood Of Record Date	9/4/2022
Normal Freeboard (ft)	9.5	Foundation Type	Rock and Soil
IDF Reservoir Elevation (ft)	717.5	PGA (1:2475)	0.20g
IDF Freeboard (ft)	2.5	Gate Type (Qty)	Radial (2)

2.1.3 Dams A-G

Dams A and C are zoned embankments with a high hazard potential classification, while Dams B, D, E, F, and G are much smaller embankments with low hazard potential classifications. Dam C is a homogeneous, impervious embankment with an internal chimney drain and one finger drain near the center of the dam. Dams D, E, F, and G are multiple zoned embankments. The downstream shells, which see fluctuating reservoir elevations during operation, are constructed of well graded hard durable limestone or sandstone. Slopes of all embankments are protected by rock fill.

Engineering data for Dam A is included in Table 3. Dam B is a 10-foot-high, 690-foot-long earthfill structure.

Table 3 Engineering Data for Dam A

Year Dam Completed	1992	Referenced Datum	NGVD29
Dam Type	Earth	Datum Conversion	NA
		Storage Normal (ac-ft)	19880
Dam Height (ft)	70	Zero Freeboard Capacity (cfs)	26500
Spillway Width (ft)	NA	Drainage Area (Square Miles)	14
Nominal Dam Crest Elevation (ft)	720	100-Year Flood Flow (cfs)	1089
		IDF Outflow (cfs)	24940
Lowest Elevation of Embankment (ft)	720	PMF Outflow (cfs)	24940
Normal Pool Elevation (ft)	710.5	Flood Of Record Flow (cfs)	NA
Gated Spillway Crest Elevation (ft)	NA	Flood Of Record Date	9/4/2022
Normal Freeboard (ft)	9.5	Foundation Type	Rock and Soil
IDF Reservoir Elevation (ft)	717.5	PGA (1:2475)	0.20g
IDF Freeboard (ft)	2.5	Gate Type (Qty)	NA

Dams C, D, E, and F form Auxiliary Pool I and separate Auxiliary Pool I from the Lower Reservoir. Engineering data for Dam C is included in Table 4. Dam D is a 20-foot-high, 775-foot-long earth and rockfill structure. Dam E is a 50-foot-high, 700-foot-long earth and rockfill structure. Dam F is a 50-foot-high, 405-foot-long earth and rockfill structure. Dam G is a 30-foot-high, 335-foot-long earth and rockfill structure that forms Auxiliary Pool II.

Table 4 Engineering Data for Dam C

Year Dam Completed	1991	Referenced Datum	NGVD29
Dam Type	Earth	Datum Conversion	NA
		Storage Normal (ac-ft)	5260
Dam Height (ft)	27	Zero Freeboard Capacity (cfs)	10000
Spillway Width (ft)	NA	Drainage Area (Square Miles)	4
Nominal Dam Crest Elevation (ft)	727.5	100-Year Flood Flow (cfs)	240
		IDF Outflow (cfs)	4058
Lowest Elevation of Embankment (ft)	727.5	PMF Outflow (cfs)	4058
Normal Pool Elevation (ft)	715	Flood Of Record Flow (cfs)	209
Gated Spillway Crest Elevation (ft)	NA	Flood Of Record Date	9/4/2022
Normal Freeboard (ft)	12.5	Foundation Type	Rock and Soil
IDF Reservoir Elevation (ft)	726.2	PGA (1:2475)	0.20g
IDF Freeboard (ft)	1.3	Gate Type (Qty)	NA

2.2 Intake/Outlet Structure, Power Tunnels, and Drainage Adits

The reinforced concrete intake/outlet structure is situated in the northeast section of the Upper Reservoir. The structure has a dual purpose; it functions as an outlet when water is pumped from the plant to the Upper Reservoir and reverses to an intake structure to the power water conduit system during the generating mode. It is a morning-glory vertical shaft type structure with crest elevation at El. 1,317 feet above mean sea level (MSL) and diameter of 70 feet, tapering down to 50 feet at El. 1,304 feet, and is submerged during normal operating conditions. The crest connects to the shaft by a transition section tapering from a 50-foot diameter to a 35-foot diameter at El. 1,217.0 feet to reach acceptable flow conditions and regulate flow velocities within acceptable limits.

Three concrete floatwell structures, one near the intake and two on either side of the overflow spillway, house remote gauging equipment used for reservoir elevation verification and emergency trip sensors set to activate at EL 1,394 feet (2 feet above normal full pool).

The power water conduit system, which connects the Upper Reservoir intake/outlet structure to the powerhouse, consists of a power shaft, tunnel, and penstock system. The shaft is a 567-foot high 35-foot diameter concrete-lined shaft. Connected to the shaft is a 1,935-foot long, 35-foot diameter concrete-lined tunnel and two concrete-lined bifurcations. All concrete linings contain steel reinforcement. The three 19-foot diameter steel-lined penstocks, each of which are 470 feet long, are connected to the bifurcations by means of three 19-foot diameter concrete-lined penstock connections of varying lengths. The diameter of the shaft increases from 35-foot inside diameter to 50-foot diameter at the bottom of the intake/outlet structure. The power tunnel connects to a 90^{o} elbow connector at the bottom of the shaft and slopes at a 1.5 percent grade to within 50 feet upstream of the first bifurcation. The 40-foot-long upstream bifurcation and the 30-foot-long downstream bifurcation divide the tunnel into three parallel penstocks, which run horizontally on centerline at El. 611.0 feet. The concrete lining in these bifurcations varies in thickness from two feet to a maximum of 5 feet. The steel lining of the penstocks is 1-1/2 inches thick.

The drainage adit consists of the main adit, east and west cross adits, and the test chamber. The adits are horseshoe shaped and range in diameter from 8 to 12 feet. All of the adits have a shotcrete lining. Construction records indicate that the shotcrete is 2 to 4 inches thick. In the main adit and cross adits, rock bolts are generally installed in the

crown of the adit with no discernable pattern (i.e., "spot bolts"). The test chamber is approximately 30 feet in diameter and the rock bolts are installed on a pattern of 4-feet to 6-feet, each way, in the crown and side walls.

2.3 Powerhouse

The concrete powerhouse is 16 stories high (175 feet), 13 of which are underwater, and is located at the base of Rock Mountain below the Upper Reservoir. The powerhouse is 156 feet wide at the bottom, 244 feet wide at the top, and 348 feet long. There are three reversible Francis vertical shaft units. The concrete power tunnel from the Upper Reservoir intake runs vertically through the mountain to approximately the elevation of the turbines, where it turns approximately 90° and runs just upstream of the powerhouse. The power tunnel then trifurcates to three steel-lined penstocks leading to the generating units. This facility contains three vertical shaft, reversible Francis type pump-turbines each directly connected to a synchronous motor/generator. Both the pump-turbines and the motor-generators were manufactured by Hitachi, Ltd. Flows discharged from the powerhouse are stored in the Project's Lower Reservoir, discussed below.

2.4 Reservoirs and Auxiliary Pools

2.4.1 Upper Reservoir

The Project's Upper Reservoir is formed by a 12,895-foot-long continuous earth and rockfill dam with an impervious core, which circumscribes the natural concave top of Rock Mountain. When it is at its normal maximum operating pool elevation, 1,392 feet MSL, this impoundment is 221 acres in size and contains 10,650 acre-feet of gross storage (10,003 acre-feet of active storage). During normal operations, the Upper Reservoir water level has a 51-foot fluctuation (between elevations 1,392 feet and 1,341 feet MSL). The Upper Reservoir provides a continuous generating time of approximately 7.5 hours and it takes approximately 7 hours to pump water back to the Upper Reservoir.

2.4.2 Lower Reservoir

The Project's Lower Reservoir is formed by the Main Dam and Dams A, B, D, E, F, and G. The Lower Reservoir extends upstream on Heath Creek around the north and west sides of Rock Mountain in the valley directly at the base of the mountain. Auxiliary Pool I lies north and Auxiliary Pool II lies west of the Lower Reservoir and both pools feed into the Lower Reservoir via a control gate or an ungated spillway. The Lower Reservoir is

approximately 600 acres in area and contains 18,800 acre-feet of storage at its normal maximum elevation of 710.5 feet MSL. The Lower Reservoir has a 20-foot fluctuation (between elevations 690.5 feet and 710.5 feet).

2.4.3 Auxiliary Pools

Located adjacent to the Lower Reservoir are 400-acre and 200-acre Auxiliary Pools, each of which are normally maintained at a relatively constant elevation of 715 feet MSL. Their primary purposes are to provide: (1) a total of 5,800 acre-feet of reserve storage for drought periods; (2) high-intensity recreational opportunities, including fishing, camping, swimming, and boating; and (3) wildlife management and lower-density recreational use, including picnicking and hiking.

The larger (400-acre) Auxiliary Pool (Auxiliary Pool I [East] or Antioch Lake) is contained by an ungated spillway, Dams C, D, E, and F, and low-level outlet works. The smaller (200-acre) Auxiliary Pool (Auxiliary Pool II [West] or Heath Lake) is formed by Dam G with an ungated spillway and low-level outlet works.

2.5 Generating Equipment

The powerhouse contains three vertical shaft, reversible Francis type pump-turbines each directly connected to a synchronous motor/generator. Both the pump-turbines and the motor-generators were manufactured by Hitachi, Ltd. Each pump-turbine unit has a rated output of 352 MW at 613 feet of net head. The runners consist of a cast stainless steel crown and fabricated band welded to seven blades formed from plates. The pump-turbine distributor contains 20 stay vanes and 20 wicket gates. The Project has an installed generating capacity of 904 MW at 650 ft best-gate net head and a dependable capacity of 851 MW at 613 ft best-gate net head. The maximum hydraulic (discharge) capacity of the powerhouse in generating mode at best gate is 18,750 cubic feet per second (cfs).

2.6 Transmission Equipment

The current licensed Project includes a substation located 1.5 miles from the powerhouse and a 1.5 mile-long, 230-kilovolt (kV) transmission line.

OPC is proposing to remove from the principal project works and the project boundary the substation, which is commonly referred to as the "Switching Station" of the Project, and the three 230-kV transmission lines comprising a total of approximately 1.5 miles. The substation and transmission lines have been part of Georgia's Integrated Transmission

System (ITS) since 1994. The ITS is a 17,800+ mile network of integrated transmission assets almost exclusively located in the State of Georgia wherein each asset is individually owned, but all transmission assets are jointly planned and operated for the benefit of all of the ITS's participating transmission owners. The ITS provides its participants nearly statewide transmission access while eliminating the need for multiple private transmission contracts or access fees. Since the substation and the transmission lines are part of the ITS, all participants in the ITS have the right to utilize the substation and the transmission lines. Because the 230-kV line and the Switching Station are part of the interconnected grid and serve non-project purposes, they are not a "primary transmission line" within the Commission's jurisdiction under Part I of the Federal Power Act. These facilities should have been removed from the license in 1994 but were inadvertently allowed to remain as part of the licensed Project. Currently, the ITS begins at the high side bushing of the generator step-up transformer.

2.7 Appurtenant Facilities

Appurtenant facilities include a small building on the top level of the powerhouse that houses two backup diesel generators, a large steel-frame crane, and four transformers. Within the powerhouse is a control room that contains multiple monitors, gauges and equipment, maps, and office space essential in monitoring and controlling the various powerhouse components. The powerhouse also includes an in-house machine maintenance shop, primary and backup fire water system, governor actuator cabinets, and four in-house substations that provide power to everything inside the powerhouse, including the auxiliary equipment for the units. The fire water system is primarily used for the main transformer deluge system. It also supplies water to a hose connection for Warehouse 1, located on the fifth floor of the powerhouse.

The Main Dam includes a control building that houses a backup diesel generator and electric panels that supply power to the hydraulic power unit used to operate the water release gates, the minimum flow control valve, sump pumps and lighting panels.

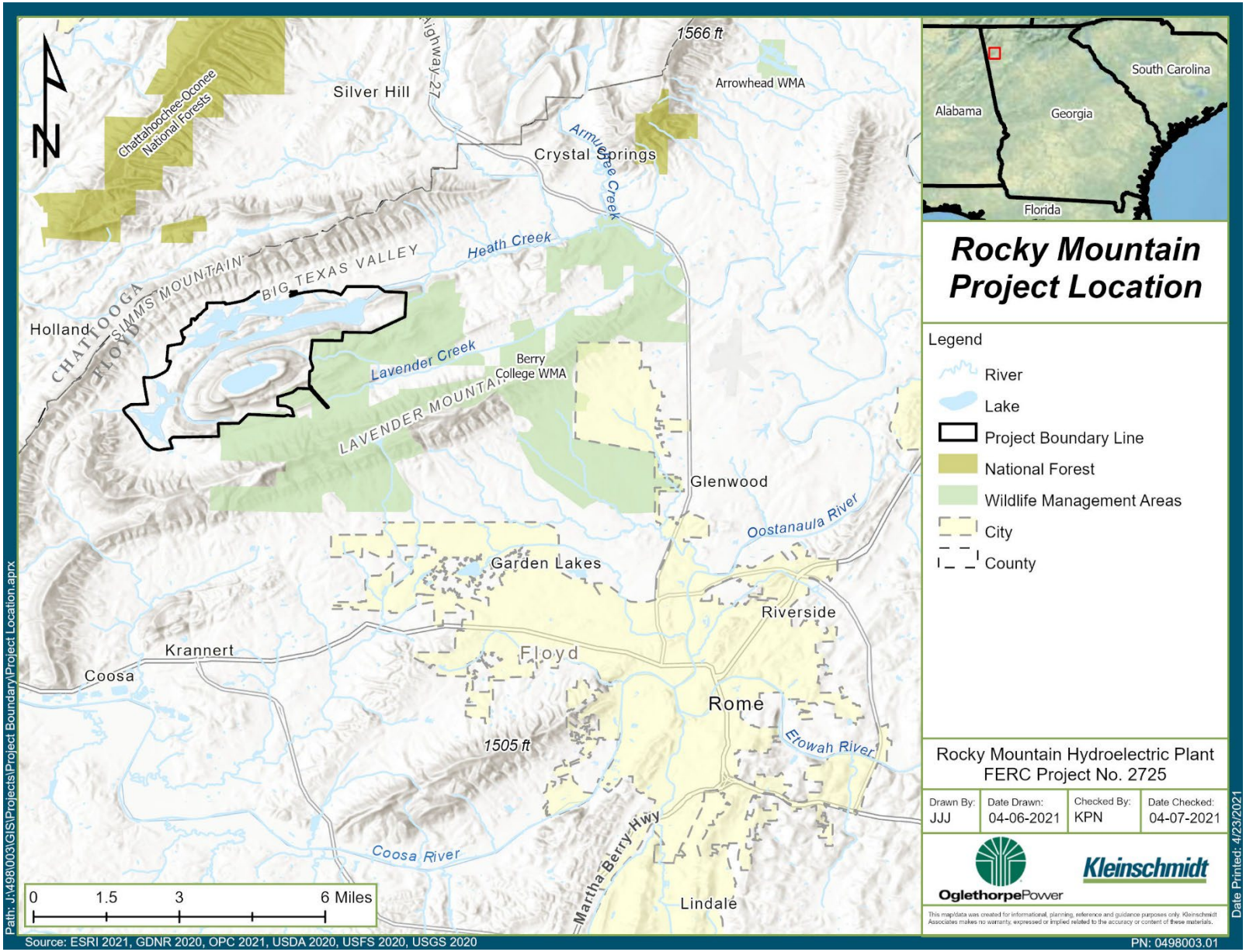
The Project also includes two communications buildings. Each building includes a back-up diesel generator and various electrical and radio equipment. Associated with each building is a radio tower. Several maintenance buildings, sheds, and warehouses used by Georgia Department of Natural Resources and OPC are located within the project boundary. A series of gravel and asphalt access roads surround the Project.

3.0 LANDS WITHIN THE UNITED STATES

There are approximately 5,000 acres of land and water within the FERC project boundary, none of which are Federal lands.

APPENDIX A

PROJECT LOCATION MAP AND PROJECT FACILITIES MAP


Silver Hill
Chattahoochee-Oconee National Forests
Highway 27
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Arrowhead WMA
Armuchee Creek
Crystal Springs
Heath Creek
BIG TEXAS VALLEY
SIMMS MOUNTAIN
CHATTOOGA
FLOYD
Holland
Lavender Creek
Berry College WMA
LAVENDER MOUNTAIN
Glenwood
Oostanaula River
Garden Lakes
Riverside
Krannert
Floyd
Coosa
Rome
1505 ft
Etowah River
Coosa River
Martha Berry Hwy
Lindale
0 1.5 3 6 Miles
Source: ESRI 2021, GDNR 2020, OPC 2021, USDA 2020, USFS 2020, USGS 2020
South Carolina
Alabama
Georgia
Florida
Rocky Mountain Project Location
Legend
River
Lake
Project Boundary Line
National Forest
Wildlife Management Areas
City
County
Rocky Mountain Hydroelectric Plant
FERC Project No. 2725
Drawn By: JJJ
Date Drawn: 04-06-2021
Checked By: KPN
Date Checked: 04-07-2021
OglethorpePower
Kleinschmidt
This map/data was created for informational, planning, reference and guidance purposes only. Kleinschmidt Associates makes no warranty, expressed or implied related to the accuracy or content of these materials.
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Date Printed: 4/23/2021
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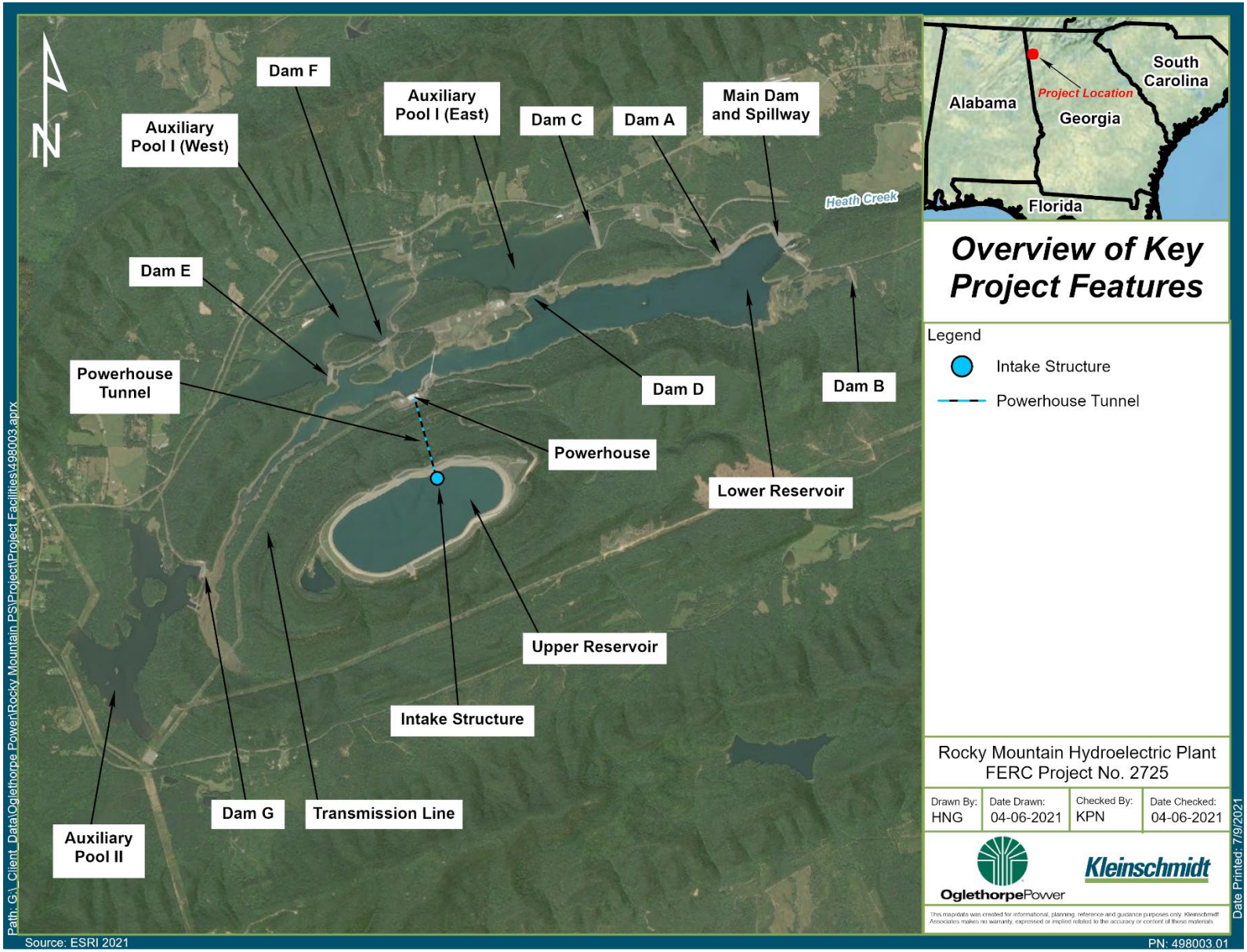
Dam F
Auxiliary Pool I (West)
Auxiliary Pool I (East)
Dam C
Dam A
Main Dam and Spillway
Heath Creek
Dam E
Powerhouse Tunnel
Dam D
Dam B
Powerhouse
Lower Reservoir
Upper Reservoir
Intake Structure
Auxiliary Pool II
Dam G
Transmission Line
South Carolina
Alabama
Project Location
Georgia
Florida
Overview of Key Project Features
Legend
Intake Structure
Powerhouse Tunnel
Rocky Mountain Hydroelectric Plant
FERC Project No. 2725
Drawn By: HNG
Date Drawn: 04-06-2021
Checked By: KPN
Date Checked: 04-06-2021
OglethorpePower
Kleinschmidt
This mapdata was created for informational, planning, reference and guidance purposes only. Kleinschmidt Associates makes no warranty, expressed or implied related to the accuracy or content of these materials.
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Exhibit B

Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW

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ACRONYMS

C	
CEII	Critical Energy Infrastructure Information
CFR	Code of Federal Regulations
cfs	cubic feet per second
F	
FERC	Federal Energy Regulatory Commission
M	
MSL	mean sea level
MW	megawatt

1.0 PROJECT OPERATION

This Exhibit B for the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project or Project) provides a statement of project operation and resource utilization and was prepared in accordance with Federal Energy Regulatory Commission (FERC) regulations for a major project with existing dam at 18 CFR § 4.51(c).

As a pumped storage project, all power produced by the Rocky Mountain Project results from generation using water in the Upper Reservoir during periods of peak electricity demand. The pumping of water from the Lower to the Upper Reservoir typically occurs at night and occasionally during daytime hours during cooler months. During the cooler months, generation occurs during the morning and evening hours. During the summer, generation occurs during the afternoon.

During normal daily operation of generation and pumping, the Upper Reservoir water level fluctuates between the normal maximum operating pool elevation of 1,392 feet MSL (elevation above mean sea level) and the normal minimum operating pool elevation of 1,341 feet MSL. The active volume of the Upper Reservoir is 10,003 acre-feet of water. At the normal minimum operating pool elevation, the Upper Reservoir contains a reserve storage capacity of 647 acre-feet.

During the generating cycle, the Lower Reservoir typically increases in elevation by 20 feet from 690.5 feet MSL to 710.5 feet MSL. Storage in the Auxiliary Pools is used to replenish the Lower Reservoir only if the elevation of the Lower Reservoir has declined to elevation 681 feet MSL. Due to potential cavitation damage to the pump/turbines, the project operations are limited when the elevation of the Lower Reservoir falls below elevation 681 feet MSL.

One of the primary benefits of the Project is its ability to provide spinning and supplemental (non-spinning) reserves. When providing spinning reserves, a unit is loaded to a part load, usually 100-135 megawatts (MW), and the differential between operating power and 100-percent capacity is treated as spinning reserve. The present units have a large, undesirable rough operating zone from 136 MW to 249 MW that is not available for running.

Supplemental (non-spinning) reserves are provided by having the units responding to dispatch such that they can be brought online in less than 5 minutes from a call. This can be done from a standing start or from the synchronous condensing mode.

Additionally, the Project utilizes excess solar power, a growing renewable resource in Georgia, when it is not needed for energy requirements to refill the Upper Reservoir. Such operations complement solar energy and help maintain a reliable electricity grid with no increase in emissions.

1.1 Manual or Automatic Operation

The Project is staffed 24 hours a day and is operated in accordance with power grid dispatch requirements to provide peaking power and spinning reserve in the generating mode. The Project uses excess power from the grid in the pumping mode. The units are started and stopped from the distributed control system by an operator in the control room.

1.2 Estimate of Plant Capacity Factor

The annual plant capacity factor (the ratio of the average load on the plant for a certain period of time to the capacity rating of the plant) for the Project is estimated to be 13.32 percent.

1.3 Proposed Operation During Adverse, Mean, and High-Water Years

OPC proposes to continue operating the Rocky Mountain Project as it is currently operated, as described below.

Adverse Years (Drought Operations): To prevent cavitation damage to the pump-turbines, the project operations are limited when the elevation of the Lower Reservoir falls below elevation 681 ft MSL. During drought conditions, storage in the Auxiliary Pools is used to replenish the Lower Reservoir only if the elevation of the Lower Reservoir has declined to elevation 681 ft MSL. OPC is proposing to continue this mode of operations during drought conditions.

Mean Years (Normal Operations): During normal daily operation of generating and pumping, the Upper Reservoir water level fluctuates between the normal maximum operating pool elevation of 1,392 ft MSL and the normal minimum operating pool

elevation of 1,341 ft MSL. The active volume of the Upper Reservoir is 10,003 acre-ft of water, which is cycled between the Lower and Upper Reservoirs. During the generating cycle, the Lower Reservoir typically increases in elevation by 20 ft from approximately 690.5 ft MSL to 710.5 ft MSL.

In accordance with Article 34 of the existing license, the Project provides a continuous minimum flow release of 1.2 cubic feet per second (cfs) from the Main Dam (Lower Reservoir) into Heath Creek.

OPC is proposing to continue the current mode of operations under mean water years in the new license term.

High-Water Years (High-Flow Operations): Given the limited nature of project inflows from the upstream drainage area of Heath Creek, which is approximately 16.6 square miles at the Main Dam, high-flow operations are not significantly different from normal operations.

2.0 GENERATION AND HYDROLOGY

2.1 Estimate of Dependable Capacity

The Project has an installed generating capacity of 904 MW at 650 ft best-gate net head and a dependable generating capacity of 851 MW at 613 ft best-gate net head.

2.2 Gross Generation

Gross generation at the project between October 1, 2018 and September 30, 2023 is included in Table 1. For the five-year period October 1, 2018 through September 30, 2023, project gross generation averaged 1,360,416,201 kilowatt-hours, pumping power averaged 1,812,719,297 kilowatt-hours, and net generation averaged -452,303,096 kilowatt-hours.

Table 1 Project Gross Generation, October 2018-September 2023

Time Period	Gross Generation (kwh)	Pumping Power (kwh)	Net Generation (kwh)
October 1, 2018 – September 30, 2019	1,479,758,800	1,962,978,320	-483,219,520
October 1, 2019 – September 30, 2020	1,545,009,200	2,057,531,933	-512,522,733
October 1, 2020 – September 30, 2021	1,183,845,504	1,579,375,233	-395,529,729
October 1, 2021 – September 30, 2022	1,303,525,067	1,740,247,133	-436,722,066
October 1, 2022 – September 30, 2023	1,289,942,434	1,723,463,864	-433,521,430
Average	**1,360,416,201**	**1,812,719,297**	**-452,303,096**

2.3 Streamflow Data and Flow Duration Curves

Inflow to the Project originates from small, headwater tributaries and drainageways of the Heath Creek system that drain toward the Auxiliary Pools and the Lower Reservoir. There are no natural watersheds or tributary streams entering the Upper Reservoir atop Rock Mountain. As a pumped storage facility, flows from Heath Creek are not directly used for generation.

Discharges from the Project occur at the Main Dam and are measured at the minimum flow release valve at the Main Dam and at the U.S. Geological Survey (USGS) Gage No. 02388320 (Heath Creek near Armuchee, GA) located about 0.3 mile downstream of the Main Dam. Flows released from the Project, as measured at the Heath Creek gage, for the past five years (2018-2022) have averaged 30 cfs. The maximum instantaneous flow recorded at the USGS gage within the past five years was 3,550 cfs, occurring on September 4, 2022. The Project releases a minimum flow to Heath Creek through a 6-inch diameter pipe/flow release valve to meet the minimum flow requirement of 1.2 cfs. OPC continuously monitors the minimum flow requirement at the Main Dam using an Annubar flow measuring device, and not the USGS gage, because of the greater accuracy of the release valve measurement. The minimum instantaneous flow recorded from the flow release valve within the past five years during normal operation was 1.36 cfs.

Daily average flow data at the USGS Gage No. 02388320 were compiled for the period January 1, 1996, through December 31, 2022. Monthly flow duration curves are included in Appendix A of this Exhibit B.

2.4 Area Capacity Curves

Area-capacity curves and a corresponding table for the Project are included in Appendix B of this Exhibit B.

At normal maximum operating pool elevation, 1,392 ft MSL, the Upper Reservoir is 221 acres, and has a gross storage capacity of 10,650 acre-ft and 10,003 acre-ft of active storage capacity. The Lower Reservoir is approximately 600 acres in area and has a gross storage of 18,800 acre-ft at its normal maximum elevation of 710.5 ft MSL.

2.5 Reservoir Guide Curves

The Rocky Mountain Project is a pumped storage project and therefore does not utilize reservoir guide or rule curves for the project reservoirs.

2.6 Estimated Hydraulic Capacity

The estimated hydraulic capacity of the powerhouse in generating mode at best gate and 650 ft. net head is approximately 18,750 cfs.

2.7 Tailwater Rating Curve

Figure 1 shows the Heath Creek Tailwater rating curve.

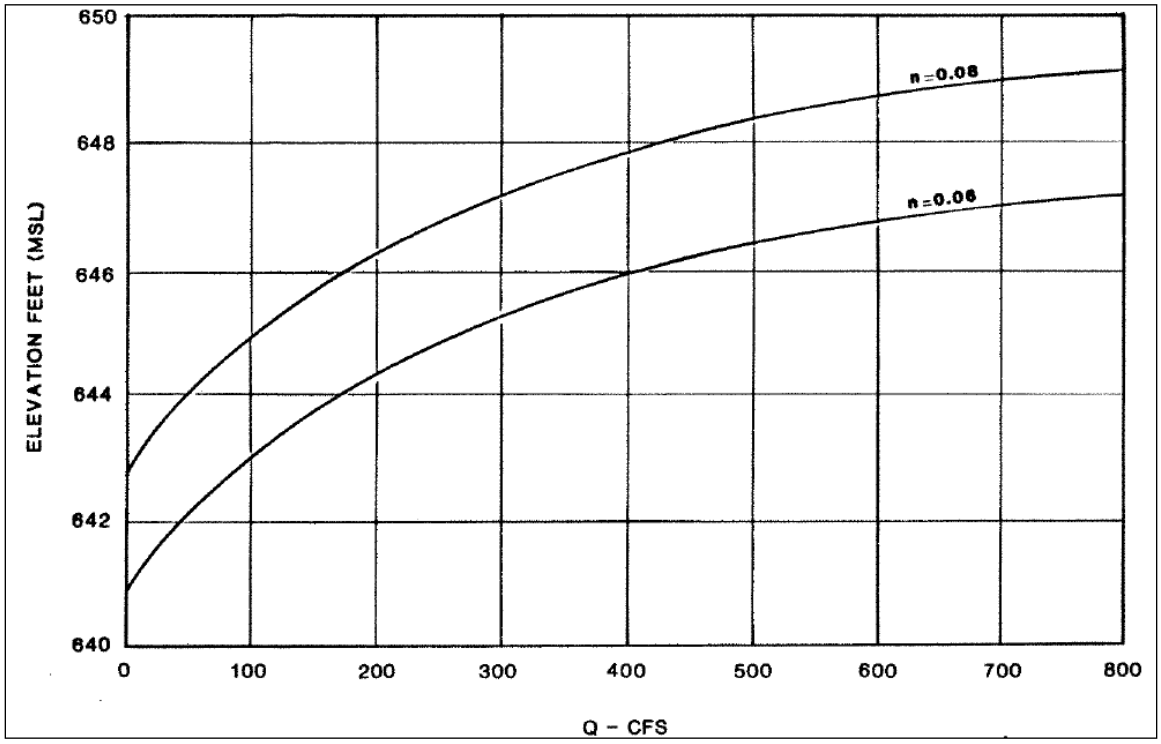


Figure 1 Heath Creek Tailwater Rating Curve

2.8 Powerplant Capability versus Head Curves

The powerplant capability versus head curves information is included in Appendix B.

3.0 POWER UTILIZATION

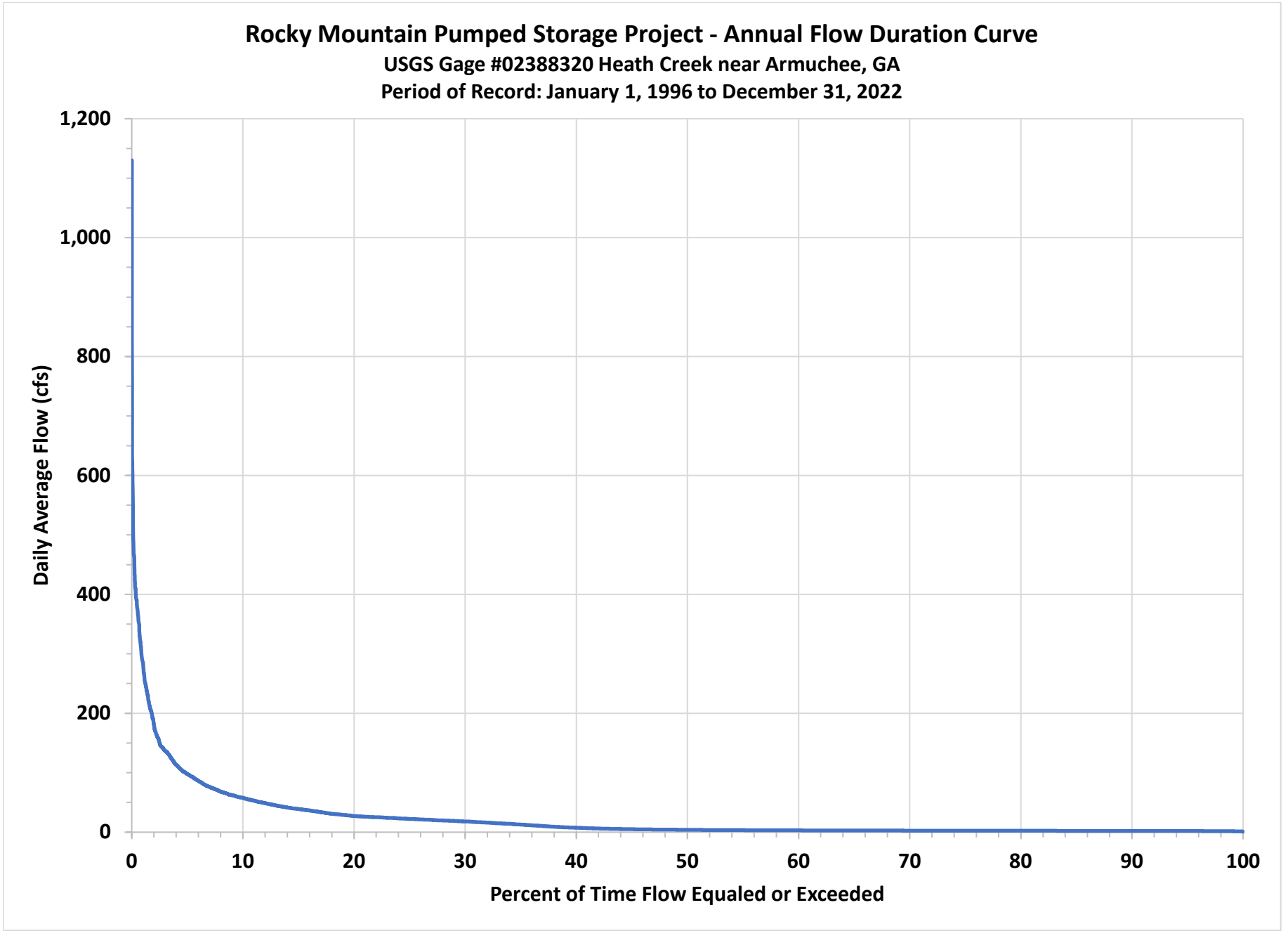
OPC is a not-for-profit electric cooperative whose principal business is providing wholesale electric services to its 38 retail electric distribution cooperative members (Members). The primary use of OPC's share of the Project is to provide Members peaking generation each day during periods of high demand. The Project also stores energy produced by baseload plants and solar power plants during off peak periods by pumping water from the Lower Reservoir into the Upper Reservoir. Of the 1.36 million MWH of average annual gross generation produced at the Project, approximately 6,300 MWH are used annually for station service. Additional information on power utilization will be provided in the Final License Application.

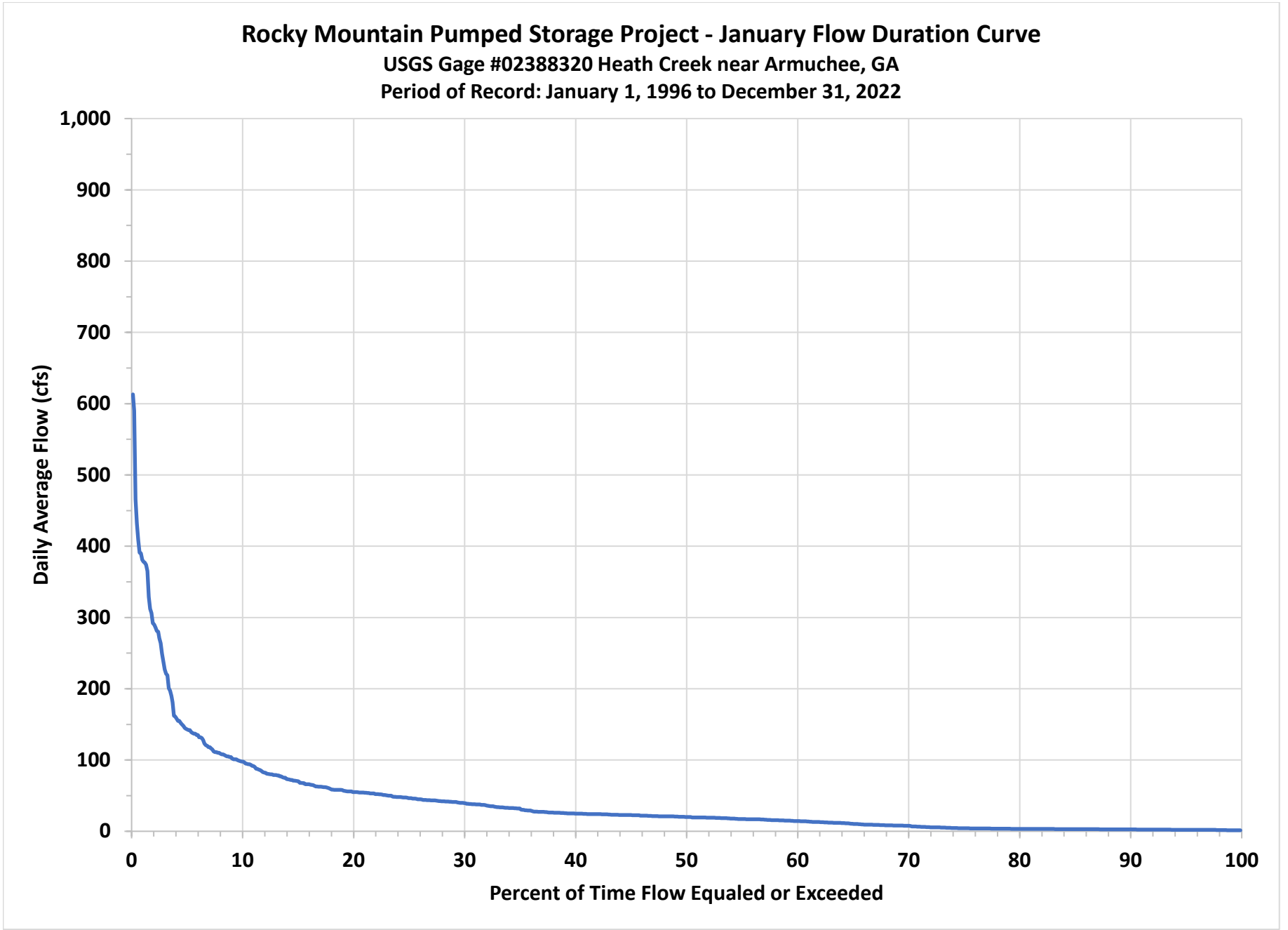
4.0 FUTURE DEVELOPMENT

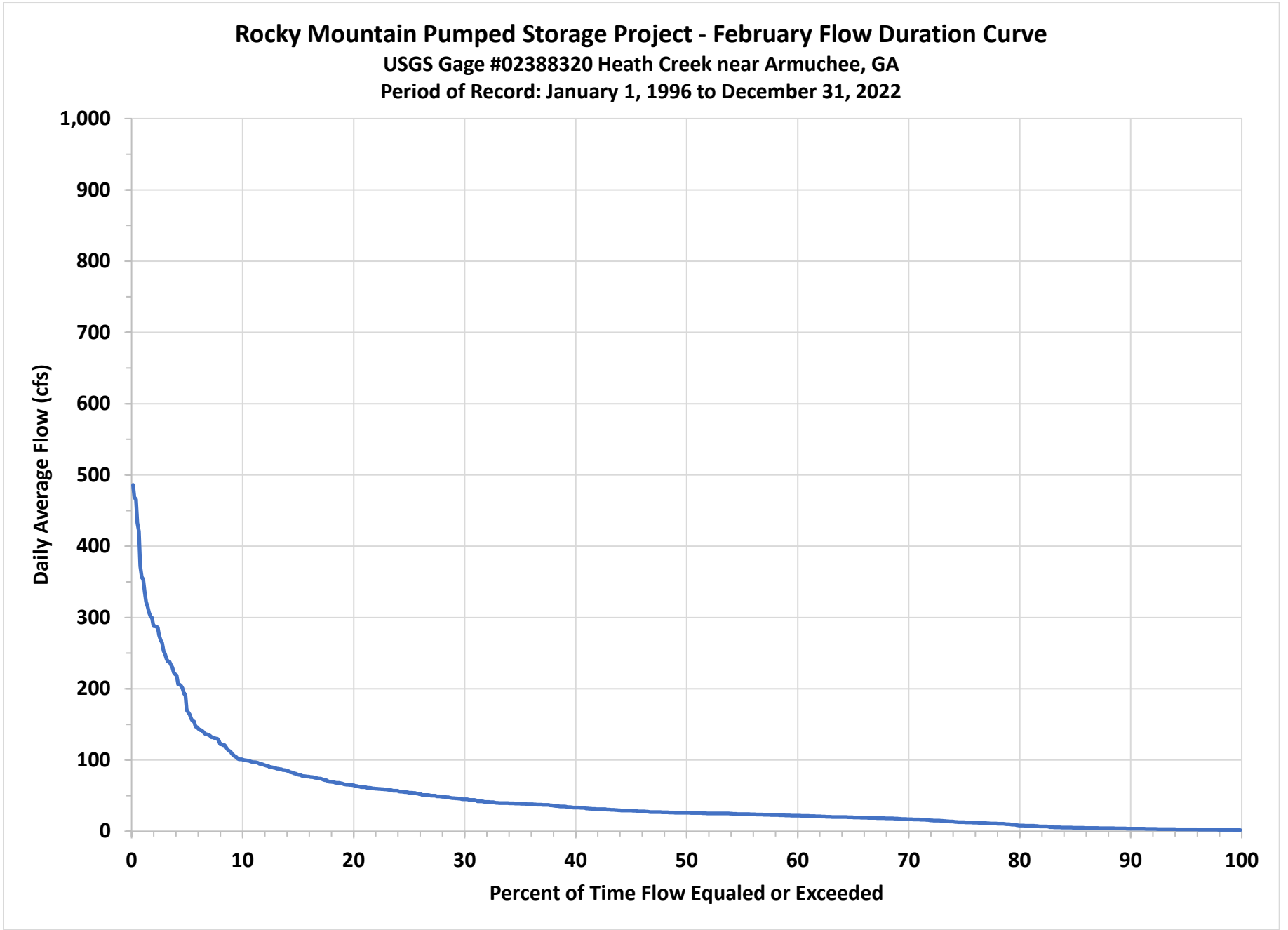
OPC does not currently have any plans for future development or capacity increases at the Project.

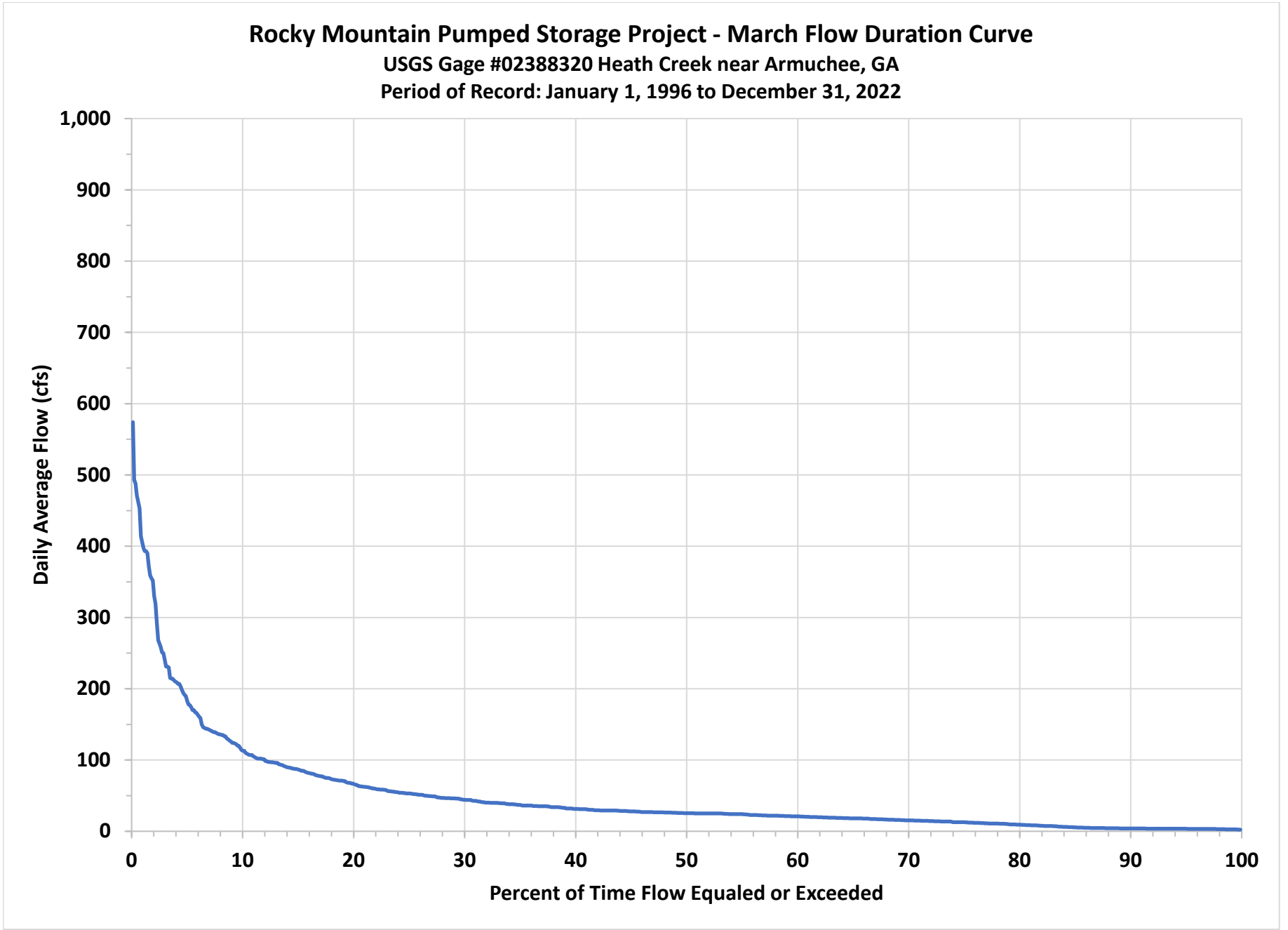
APPENDIX A

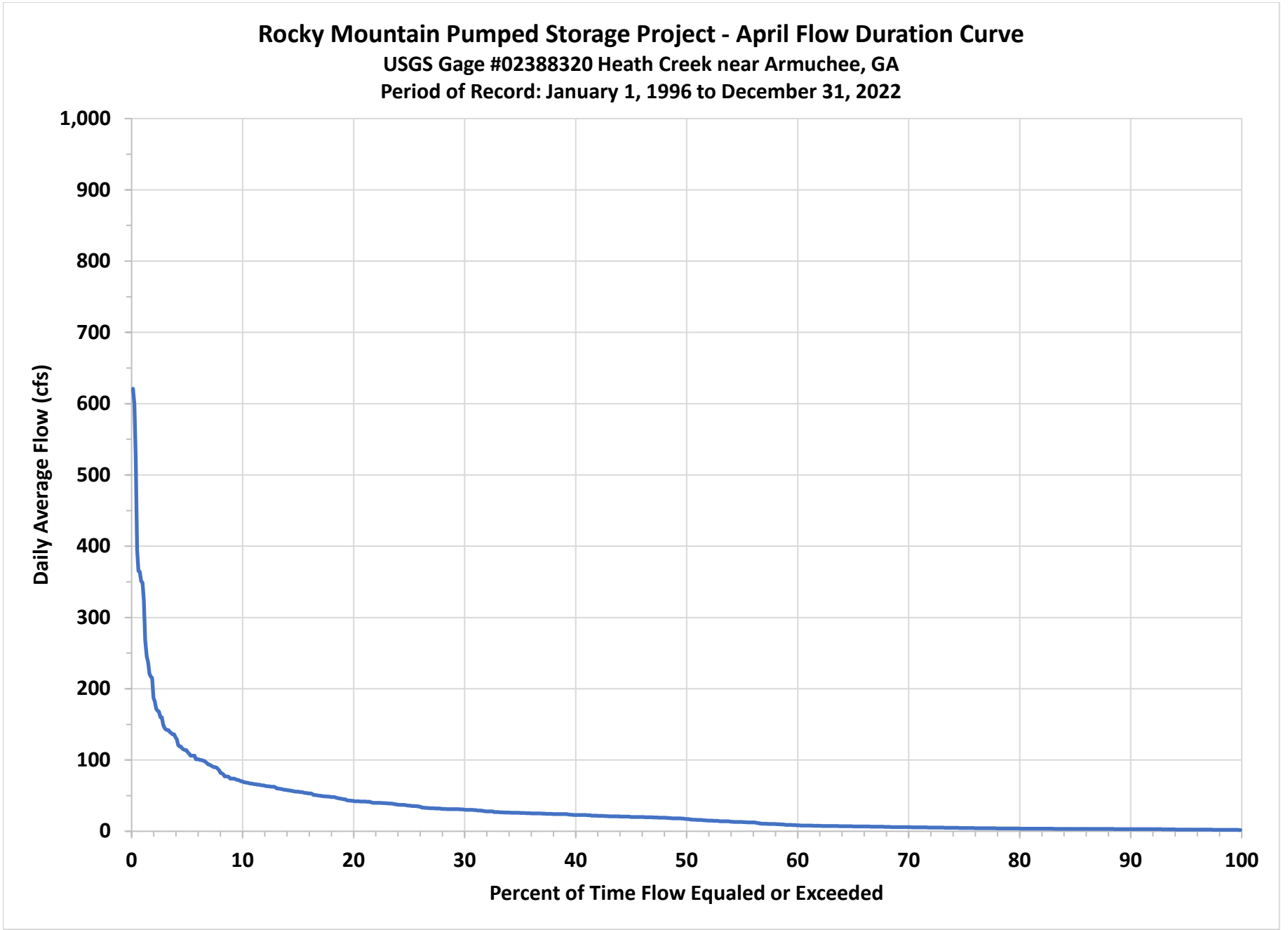
MONTHLY FLOW DURATION CURVES

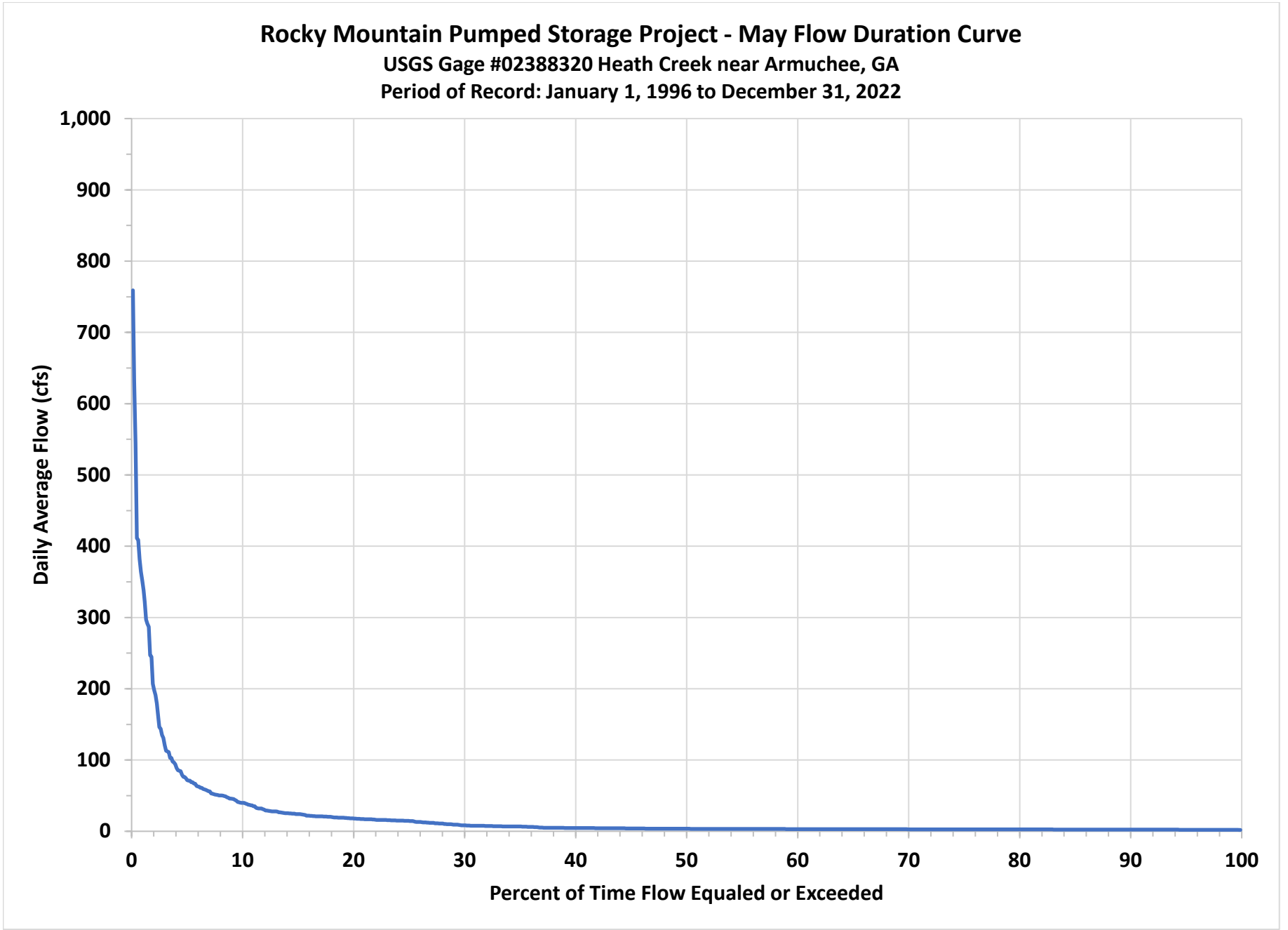

Rocky Mountain Pumped Storage Project - Annual Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,200
1,000
800
600
400
200
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

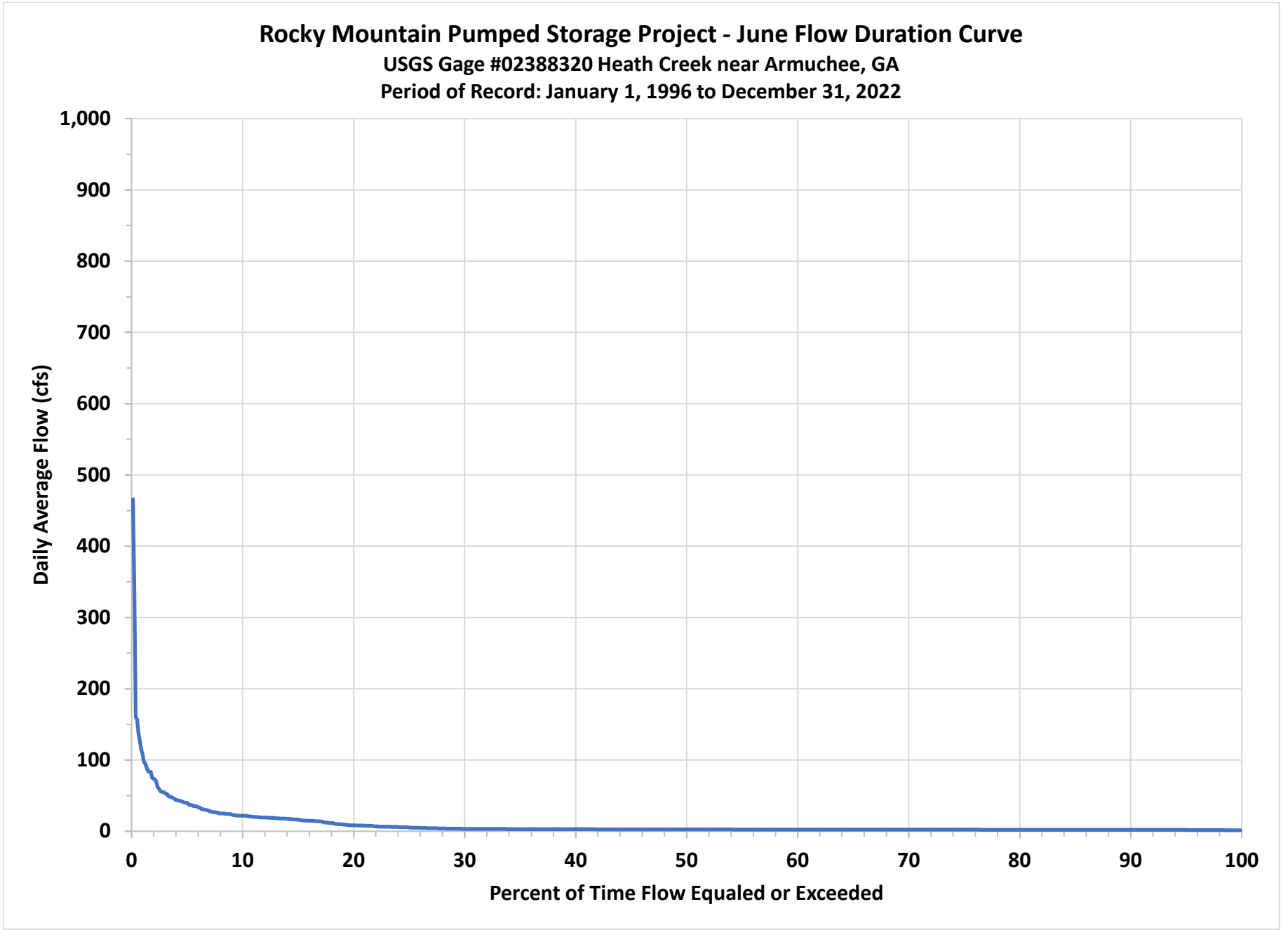

Rocky Mountain Pumped Storage Project - January Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

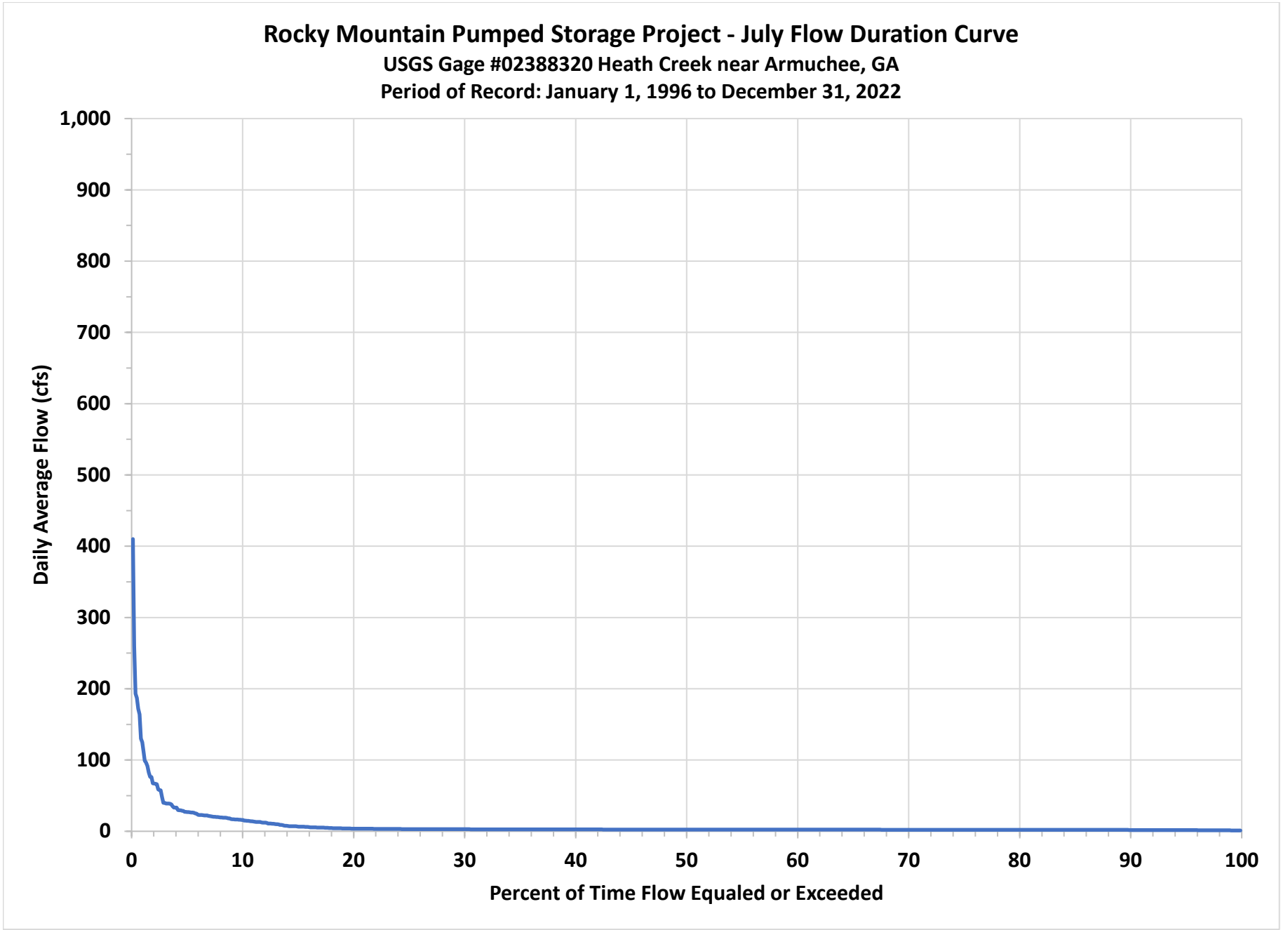

Rocky Mountain Pumped Storage Project - February Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

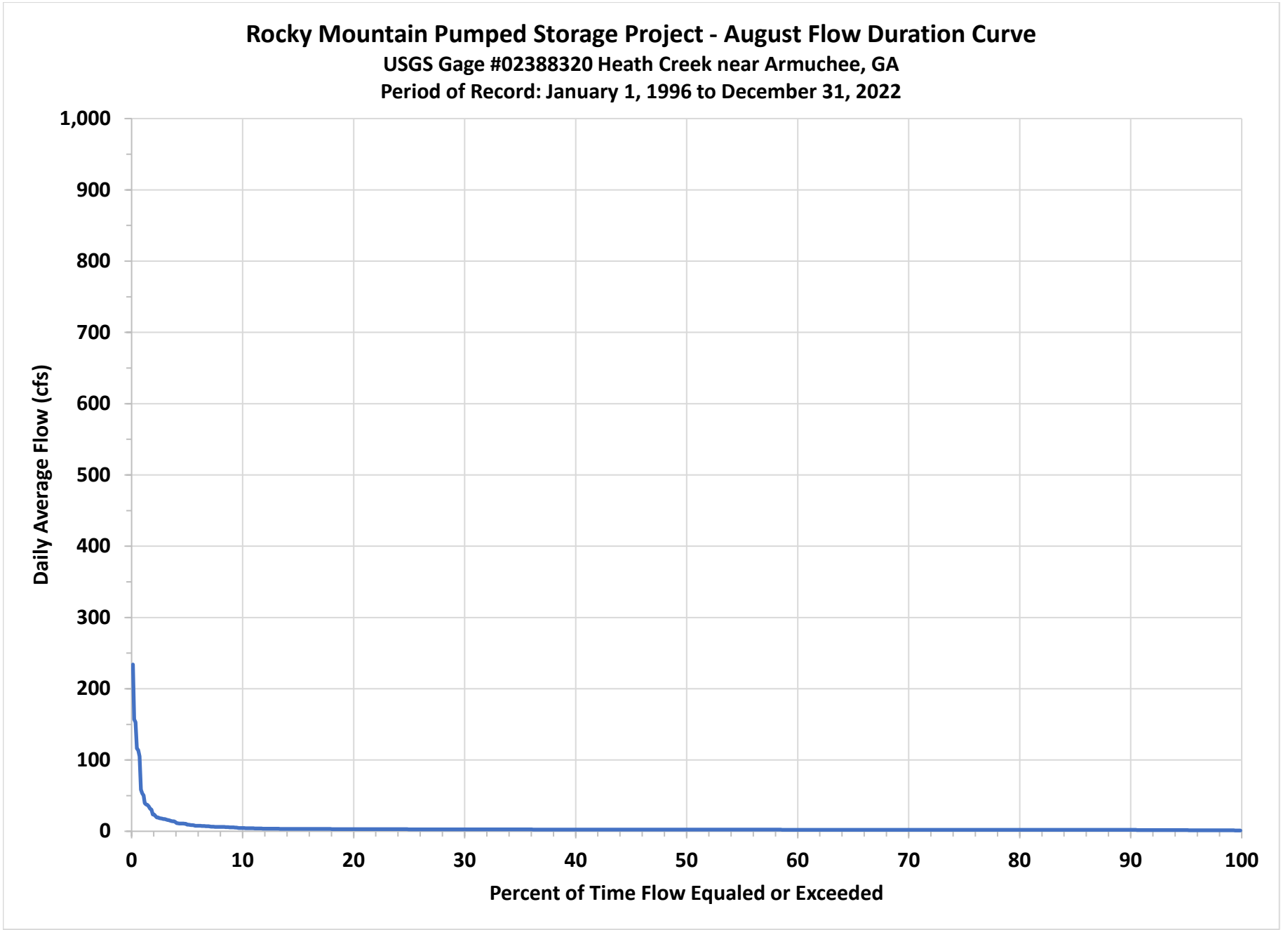

Rocky Mountain Pumped Storage Project - March Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

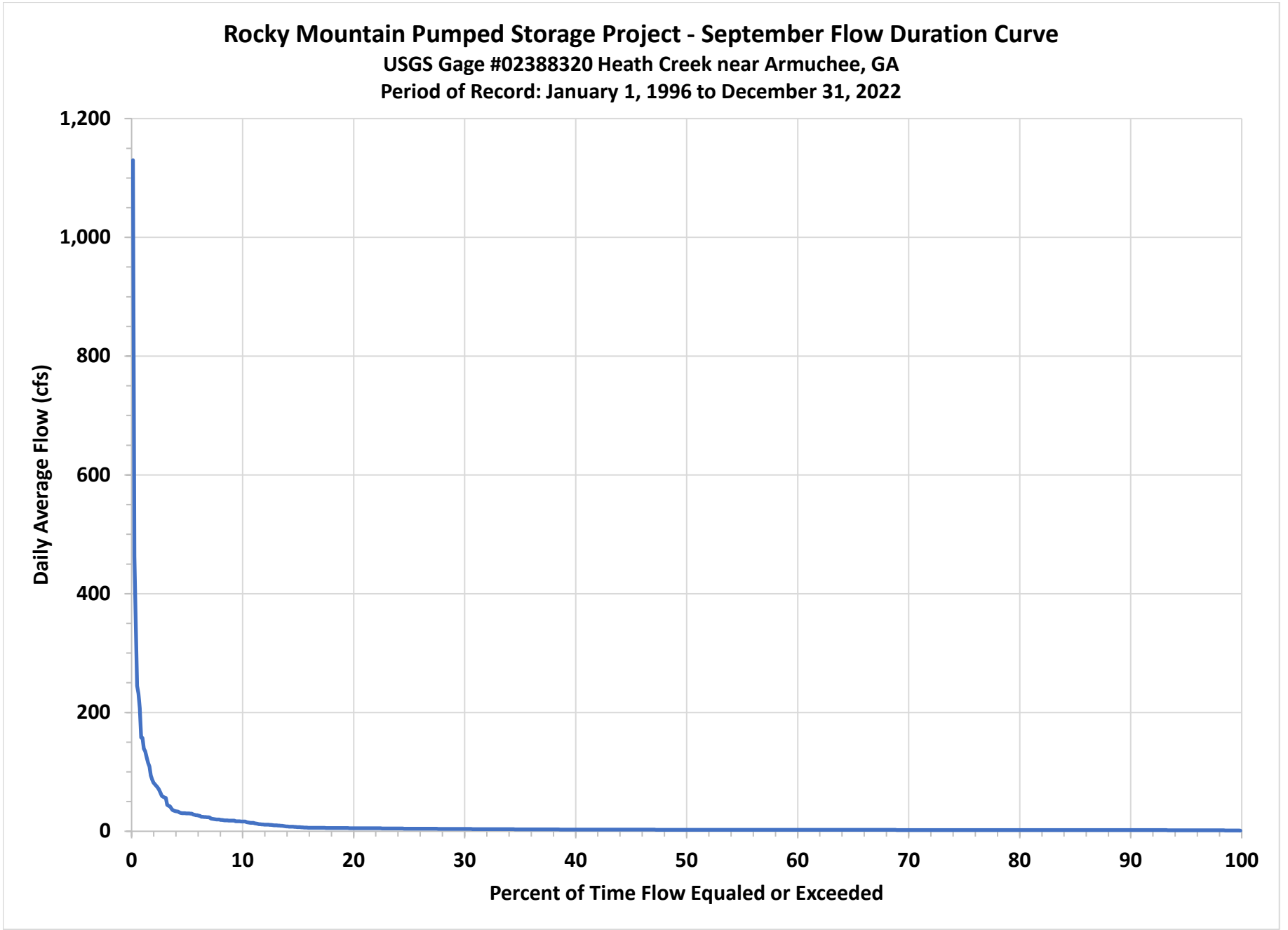

Rocky Mountain Pumped Storage Project - April Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

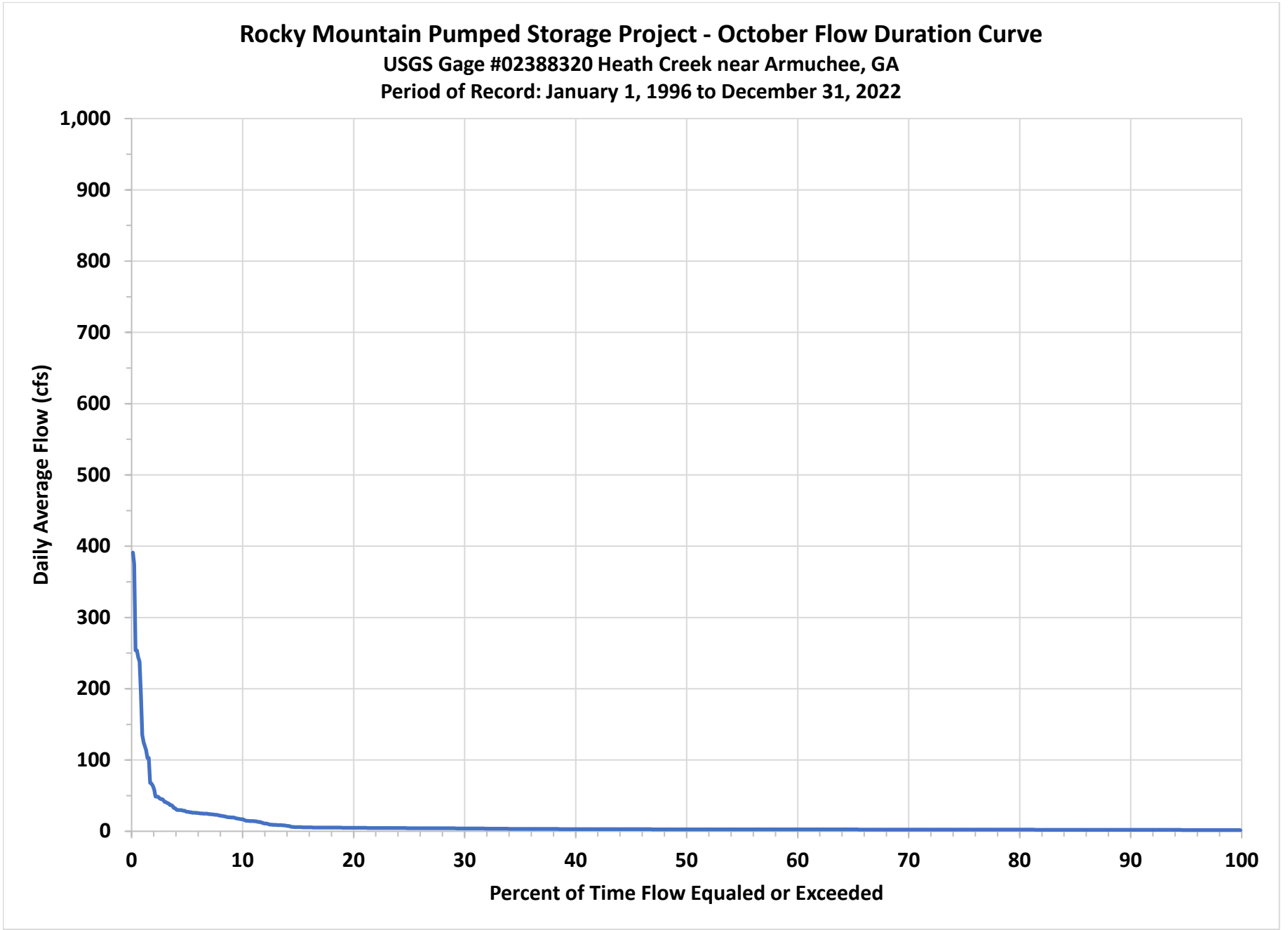

Rocky Mountain Pumped Storage Project - May Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

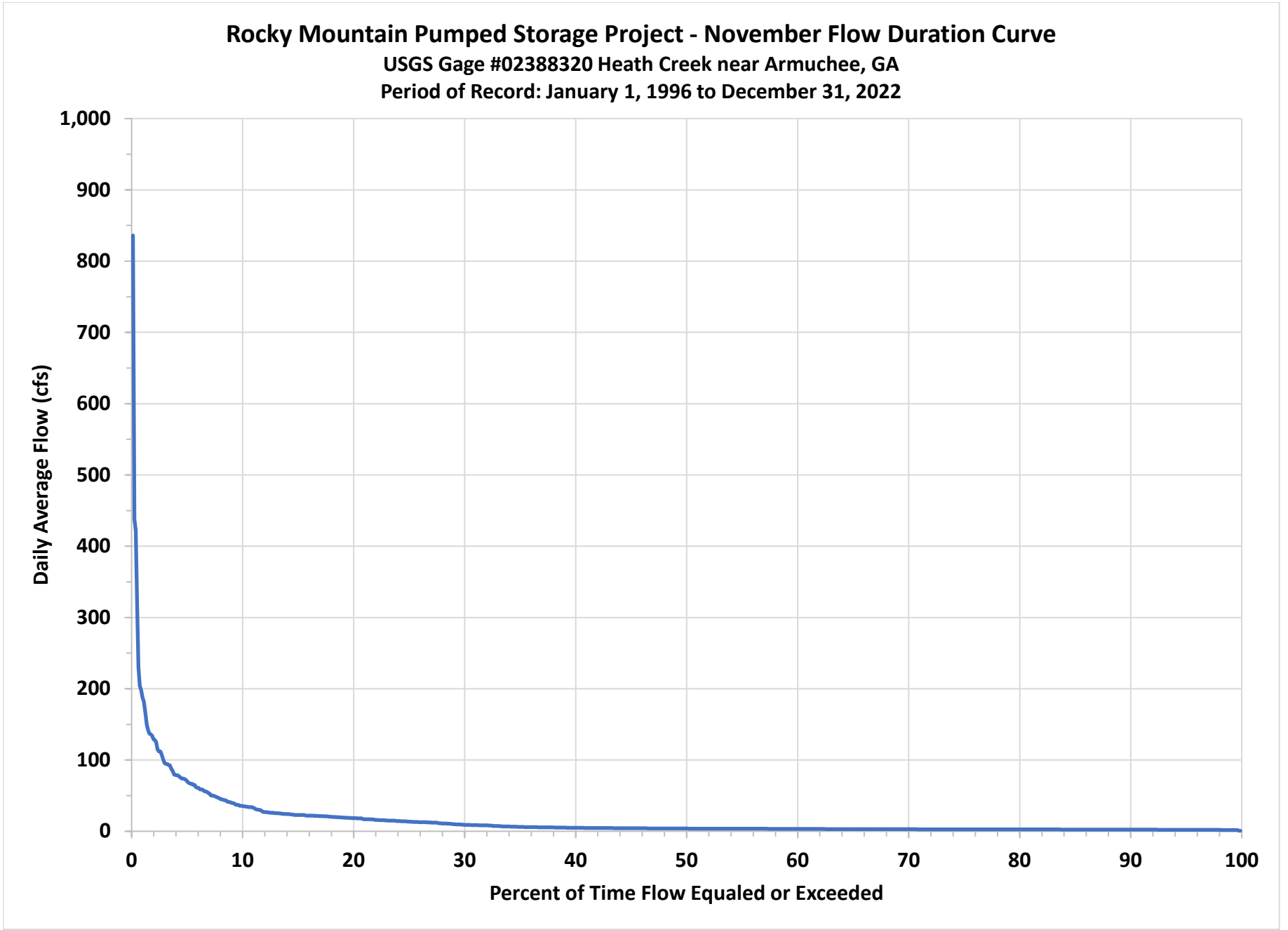

Rocky Mountain Pumped Storage Project - June Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

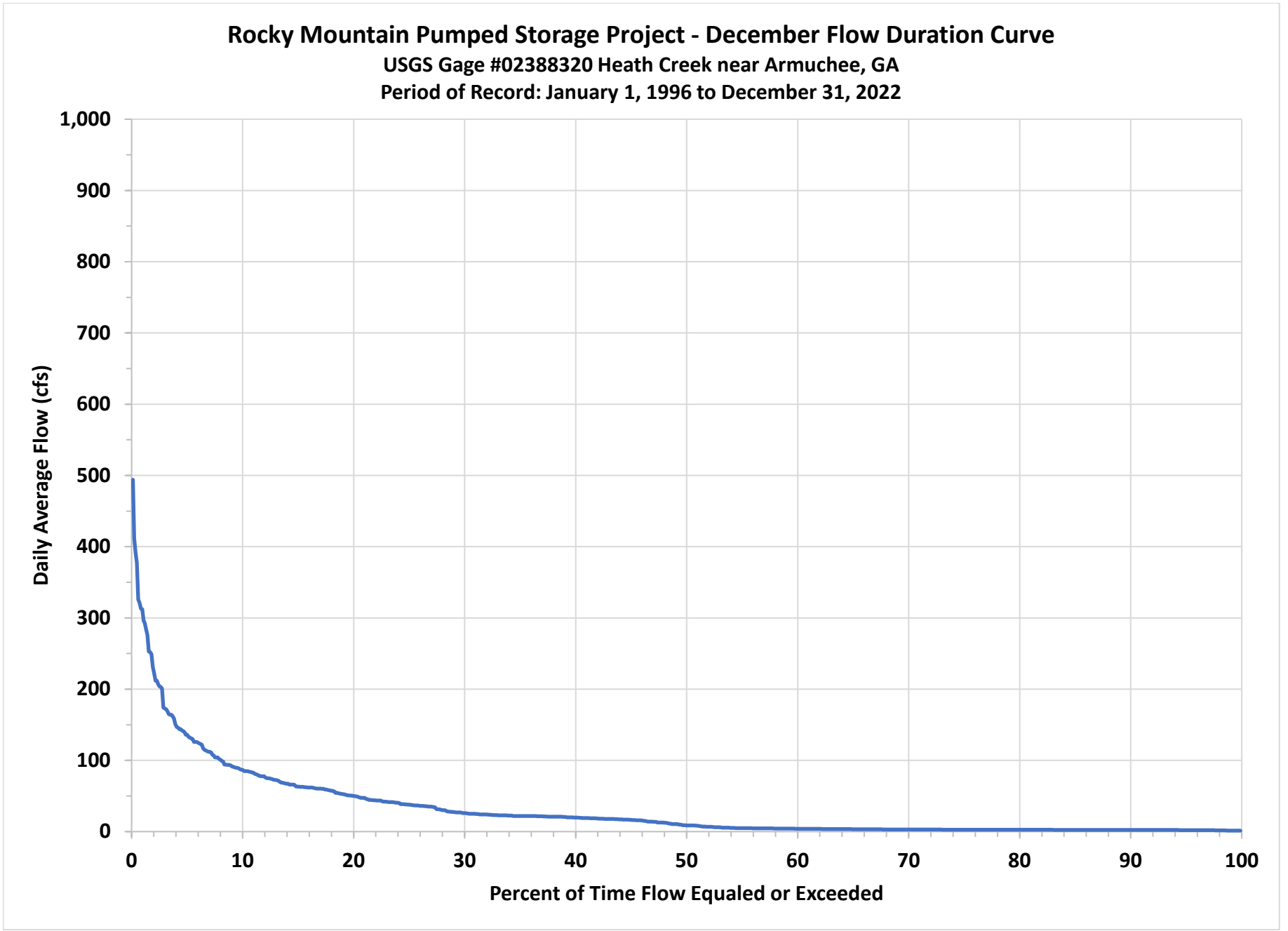

Rocky Mountain Pumped Storage Project - July Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded


Rocky Mountain Pumped Storage Project - August Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded


Rocky Mountain Pumped Storage Project - September Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,200
1,000
800
600
400
200
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded


Rocky Mountain Pumped Storage Project - October Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded


Rocky Mountain Pumped Storage Project - November Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded


Rocky Mountain Pumped Storage Project - December Flow Duration Curve
USGS Gage #02388320 Heath Creek near Armuchee, GA
Period of Record: January 1, 1996 to December 31, 2022
Daily Average Flow (cfs)
1,000
900
800
700
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
Percent of Time Flow Equaled or Exceeded

APPENDIX B

POWERPLANT CAPABILITY VERSUS HEAD CURVES

Gen Power (MW)	Net Head (ft)										
	600	610	620	630	640	650	660	670	680	690	700
0	-3.0	-3.0	-3.0	-3.0	-3.0	-3.0	-3.0	-3.0	-3.0	-3.0	-3.0
250	-2.8	-2.8	-2.8	-2.8	-2.8	-2.8	-2.8	-2.8	-2.8	-2.8	-2.8
500	-2.5	-2.5	-2.5	-2.5	-2.5	-2.5	-2.5	-2.5	-2.5	-2.5	-2.5
750	-2.6	-2.5	-2.4	-2.3	-2.1	-2.0	-1.8	-1.5	-1.3	-1.0	-0.8
1000	-2.8	-2.0	-1.3	-0.5	0.3	1.0	2.2	3.5	4.7	5.9	7.1
1250	3.3	5.6	7.8	10.0	12.2	14.5	15.8	17.2	18.5	19.9	21.2
1500	14.5	17.7	20.8	24.0	27.2	30.4	32.0	33.5	35.1	36.6	38.2
1750	26.6	30.5	34.4	38.4	42.3	46.2	48.3	50.3	52.4	54.5	56.6
2000	39.6	44.0	48.5	52.9	57.3	61.7	64.4	67.0	69.7	72.4	75.0
2250	53.3	58.0	62.7	67.5	72.2	76.9	80.1	83.3	86.4	89.6	92.7
2500	67.5	72.3	77.2	82.1	87.0	91.8	95.3	98.8	102.3	105.8	109.3
2750	82.1	86.9	91.8	96.7	101.6	106.5	110.1	113.7	117.4	121.0	124.7
3000	97.0	101.7	106.5	111.3	116.0	120.8	124.5	128.1	131.8	135.4	139.1
3250	112.0	116.6	121.2	125.8	130.4	135.0	138.6	142.1	145.7	149.2	152.8
3500	127.2	131.6	135.9	140.3	144.7	149.1	152.5	155.9	159.3	162.7	166.1
3750	142.3	146.5	150.6	154.8	159.0	163.1	166.4	169.7	173.0	176.2	179.5
4000	157.3	161.3	165.3	169.2	173.2	177.2	180.4	183.6	186.8	190.0	193.2
4250	172.2	176.0	179.8	183.6	187.4	191.2	194.5	197.7	200.9	204.1	207.3
4500	186.8	190.5	194.2	197.9	201.6	205.4	208.7	212.0	215.4	218.7	222.0
4750	201.0	204.7	208.4	212.1	215.8	219.5	223.1	226.6	230.2	233.8	237.3
5000	214.8	218.6	222.4	226.1	229.9	233.7	237.5	241.4	245.3	249.2	253.0
5250	228.1	232.1	236.0	239.9	243.8	247.7	252.0	256.2	260.4	264.6	268.9
5500	240.9	245.1	249.2	253.3	257.5	261.6	266.2	270.8	275.4	280.0	284.6
5750	253.1	257.5	261.9	266.4	270.8	275.3	280.2	285.1	289.9	294.8	299.7
6000	264.5	269.3	274.1	278.9	283.7	288.5	293.6	298.7	303.9	309.0	314.1
6250	275.3	280.5	285.7	290.8	296.0	301.2	306.4	311.7	316.9	322.2	327.4
6500	285.3	290.9	296.5	302.1	307.7	313.2	318.5	323.8	329.1	334.4	339.7
6750	294.6	300.6	306.6	312.5	318.5	324.5	329.8	335.2	340.5	345.8	351.1
7000	303.1	309.4	315.8	322.2	328.6	334.9	340.4	345.9	351.4	356.9	362.4
7250	310.8	317.5	324.3	331.0	337.7	344.4	350.5	356.5	362.5	368.6	374.6
7500	317.9	324.9	331.9	338.9	346.0	353.0	359.2	365.5	371.7	378.0	384.3
7750	324.3	331.6	338.8	346.1	353.4	360.7	367.3	373.8	380.4	387.0	393.6
8000	330.2	337.7	345.2	352.7	360.2	367.7	374.5	381.3	388.2	395.0	401.8

Flow (cfs)

Legend

xx.x	Non-Operating Upper and Lower Limits
xx.x	Non-Operating Rough Zone
xx.x	Normal Operating Zone
xx.x	Emergency Capacity Limited Operating Zone
	Smoothing Air On
	Best Efficiency

Exhibit C

Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW

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ACRONYMS II

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- 1.2 Maintenance History 3
  - 1.2.1 Unit Upgrades and Modifications 5
  - 1.2.2 Tunnel Leakage Grouting Project 5
- 1.3 Proposed Construction Schedule 6
- 1.4 References 6

LIST OF TABLES

Table 1-1 Summary of Construction History 3
Table 1-2 Significant Maintenance Items Since July 1995 3

ACRONYMS

C	
CFR	Code of Federal Regulations
F	
FERC	Federal Energy Regulatory Commission
FPC	Federal Power Commission
G	
GAB	graded aggregate base
GPC	Georgia Power Company
M	
MW	megawatt
O	
OPC	Oglethorpe Power Corporation

1.0 PROJECT CONSTRUCTION HISTORY

This Exhibit C provides a construction history for the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project or Project) and was prepared in accordance with Federal Energy Regulatory Commission (FERC) regulations for a major project with existing dam at 18 CFR § 4.51(d).

On January 2, 1974, Georgia Power Company (GPC), the Rocky Mountain Project's original applicant, filed an application to construct, maintain, and operate the Project. By order dated January 21, 1977, the Federal Power Commission (FPC; predecessor to FERC) issued a major license approving the proposed Project. The license expires in December 2026. Because of unsuitable geological conditions at the approved site of the Lower Reservoir's main dam, GPC filed an amendment to its license on November 8, 1979, requesting FERC authorization to relocate the Lower Reservoir's main dam approximately 4,400 feet downstream of the original dam site. The proposed relocation required the construction of two smaller dams and a permanent diversion channel. By order issued June 10, 1983, FERC approved the proposed amendment. GPC started construction but never completed the Project. In December 1988, GPC sold an interest in the Rocky Mountain Project to Oglethorpe Power Corporation (OPC). OPC purchased 74.61 percent of the Project, leaving GPC with the remaining 25.39 percent.

1.1 Construction History

Originally conceived in the mid-1960's, construction on the Rocky Mountain Project began in the 1970's; the project changed ownership in the mid-1980's, and was completed in July 1995, providing 848 megawatts (MW) of capacity to OPC and GPC. In May 2011, OPC completed the last of three turbine upgrades at the Rocky Mountain powerhouse, increasing the installed generating capacity to 904 MW.

The project construction was started by GPC, which filed an initial license application with FPC in 1974. This led to various studies and an environmental impact statement, and in January 1977, an order issuing a major license was issued by FPC. Design studies and construction activities began in 1978 and continued until 1985, when GPC revised its priorities and deferred the optimum date for operation of the Project. In 1986, OPC retained Harza Engineering Company to perform an evaluation of the Project and in 1988 FERC granted an "order approving transfer of license and extension of completion date."

The agreement between GPC and OPC gave responsibility for the completion of construction of the Project to OPC, which has pursued its development, operation, and maintenance since that time. At the time of the GPC/OPC agreement, portions of the Project had been completed, including the following:

- Upper Reservoir intake/outlet structure;
- Power water conduit system including the shaft, tunnel, two bifurcations, and three penstocks;
- Drainage adit above the penstocks;
- Majority of the excavation for the powerhouse and tailrace channel;
- Powerhouse access bridge across the lower reservoir; and
- Relocation of Big Texas Valley Road to allow for the planned filling of Auxiliary Pools I and II and the Lower Reservoir.

Some equipment purchases had also been made that included three pump-turbines and three spherical guard valves that were fabricated, delivered, and kept in storage.

Construction began again in August 1989 and continued until July 1995, when the project was completed. The Main Dam, spillways, intake and outlet structures, Auxiliary Pool dams and the Upper Reservoir Dam were completed with minimal problems.

Auxiliary Pool I was completely filled in December 1992; filling of Auxiliary Pool II occurred earlier, in March 1992. Filling of the Lower Reservoir occurred over a period of two years from late 1992 to December 1994. In late 1994, it took approximately 24 hours to fill the power tunnel to the level of the Lower Reservoir. Finally, the Power Shaft was filled in January 1995, and the Upper Reservoir was impounded in March 1995. Equipment was tested during the first half of 1995. The plant was placed in commercial operation in July 1995.

The construction history of the project is summarized in Table 1-1.

Table 1-1 Summary of Construction History

Date	Event
October 1978	Construction of the Rocky Mountain Project began
July 1979 – Feb 1980	Exploratory and drainage tunnel construction
June 1980 – Dec 1981	Powerhouse excavation
May 1981 – May 1982	County road relocations
Jan 1982 – Dec 1984	Tunnel, shaft, and Upper Reservoir intake/outlet construction
Sep 1982 – Aug 1983	Powerhouse access bridge construction
Sep 1985 – Sep 1987	Additional county road and water improvements
Aug 1989 – July 1995	Construction of Main Dam, spillways, Auxiliary Pool dams, and Upper Reservoir Dam
March 1992	Auxiliary Pool II filled
December 1992	Auxiliary Pool I filled
December 1994	Lower Reservoir filling complete
January 1995	Power conduits filled
Jan 1995 – July 1995	Equipment testing
March 1995	Upper Reservoir filled
July 1995	Commercial operation begins

1.2 Maintenance History

Significant maintenance items occurring after the project completion in July 1995 are outlined in Table 2.

Table 1-2 Significant Maintenance Items Since July 1995

Year	Location	Maintenance Item
1997	Upper Reservoir Dam	Erosion repair (downstream slope of dam)
1998	Upper Reservoir Dam	Erosion repair (downstream slope of dam)
	Dam A	Riprap (weir GIW-A2)
	Dam A	Rock placement (downstream slope)
	Dam A	GAB material placement (downstream edge of crest)
	Dam D	Riprap placement (upstream slope)
	Dam E	Rock placement (south end)
	Dam F	GAB material placement (downstream edge of crest)
	Dam F	GAB material placement (downstream edge of crest)
	Dam G	Rock placement (downstream edge)
	Dam G	GAB material (downstream edge of crest)
	Dam G	Roadway drainage modification and settlement repair
2000	Upper Reservoir Dam	Installed two vibrating wire and two pneumatic piezometers

Year	Location	Maintenance Item
	Ramps A, B and C	Rock placement
	Upper Reservoir	Dewatered Upper Reservoir for inspection of power tunnel and penstocks
2001	Upper Reservoir Dam	GAB material (crest roadway)
2002	Upper Reservoir Dam	Rock placement (downstream slope on the north side and south side of Ramp B)
2004	Upper Reservoir Dam	Installation of toe drain between Sta. 113+50 and 116+50
2006	Upper Reservoir Dam	Additional French drain installed at approximate station 4+75 to collect drainage from a small seep discovered while fiber-optic cable trenching was being performed.
2008	Unit 3	Turbine Upgrade
2008	Upper Reservoir Dam	Erosion repair (downstream slope of dam)
2010	Unit 1	Turbine Upgrade
2010	Upper Reservoir Dam	Erosion repair (downstream slope of dam)
2011	Unit 2	Turbine Upgrade
2011	Upper Reservoir Dam	Erosion repair (downstream slope of dam)
2011	Adit, Center Tunnel	Shotcrete the roof and walls
2012	Powerhouse Bridge	Rebuild the bridge joints
2012	Upper Access Road Ridge	Repair Shotcrete
2012	Recreation Area	Paving Project
2012	Intake Structure	Repair Intake Cap Plug Opening
2013	Powerhouse	Replace Powerhouse Roof
2013	Powerhouse and Access Roads	Paving Project
2013	Main Dam	Spillway Gate Piston Replacement
2013	All Dams, Adit, Powerhouse	Upgrade of Dam Safety Instrumentation
2015	Unit 3	Generator Rewind & Prot. Relay Upgrade
2016	Unit 1	Generator Rewind & Prot. Relay Upgrade
2016	Drainage Adit	Reamed Drain Holes
2017	Unit 2	Generator Rewind & Prot. Relay Upgrade
2018	Power Tunnel	Replaced Failed Piezometers Along Tunnel
2018	Upper Reservoir	Installed Piezometer GIP-U39A and U-39AR
2019	Main Dam Springs	Spring Remediation
2020	Upper Reservoir Dam	Erosion repair (downstream slope)
2020	Aux Spillway Aprons	Extended Riprap 25 Yards Beyond Apron
2021	Power Tunnel	Grouting Along Tunnel to Remediate Leakage
2021	Main Dam	Replaced Gallery Sump Pumps
2021	Drainage Adit	Installed Piezometer PT-19L, 19U, 20L and 20U

1.2.1 Unit Upgrades and Modifications

In 2005, OPC and GPC filed a license amendment application with FERC to upgrade the Rocky Mountain turbines. Although the plant had only been in commercial operation for 10 years by 2005, the turbines were almost 20 years old. The replacement of the turbines not only increased efficiency but also increased generating capacity by approximately 70 MW. After completing National Environmental Policy Act review of OPC's application, FERC granted approval for the license amendment. The Unit 3 turbine was upgraded in 2008, the Unit 1 turbine was upgraded in 2010, and the Unit 2 turbine was upgraded in 2011. The turbines were upgraded as noted below.

- The original 6 blade runners were replaced with a newly designed 7 blade runner.
- Design and install improved runner seals.
    a. 3-finger upper runner seal replaced 2-finger upper seal. New seals are bronze instead of stainless steel.
    b. Longer lower runner seal replaced the 2-stage lower runner seal. New seal is bronze instead of stainless steel.
- The Stay Vane profile was changed to improve flow characteristics and capacity.
- The Wicket Gates were re-profiled to change torque characteristics and improve flow characteristics.
- The Servomotors were modified to increase their stroke and flow capacity through the pump/turbine.
- The Wicket Gate Linkage was replaced to tighten up the gate mechanism. Items replaced included:
    a. Gate Arms replaced with a Gate Arm/Shear Lever design.
    b. Gate Links were replaced with a Clevis Link Bolt design.

NOTE: This removed the old Eccentric pin/Shear Pin design.

1.2.2 Tunnel Leakage Grouting Project

In 2021, OPC conducted a Tunnel Leakage Grouting Project with the goal of addressing observed increases in leakage from the power tunnel and associated increases in phreatic pressures in the rock surrounding the downstream end of the tunnel. A secondary goal of the project was to reduce rock mass pore pressures to values measured prior to the 2018 dewatering. These goals were accomplished by grouting the concrete liner of the power

tunnel and adjacent rock within and upstream of the bifurcation areas, thus reducing the leakage measured at Weir C, located in the drainage adit above the tunnel, to values measured prior to the last tunnel dewatering in late 2018. The project began in February 2021 and was completed in May 2021.

1.3 Proposed Construction Schedule

OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project.

1.4 References

HDR. 2021. Tunnel Leakage Grouting Project - Final Construction Report. July 26, 2021.

OglethorpePower

Exhibit D

Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW

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ACRONYMS

C

CEII	Critical Energy Infrastructure Information
CFR	Code of Federal Regulations
Commission	Federal Energy Regulatory Commission

D

DLA	Draft License Application

1.0 ACTUAL OR APPROXIMATE ORIGINAL COST (INITIAL LICENSE ONLY)

This application is not for an initial license.

2.0 AMOUNT PAYABLE AT TAKEOVER

2.1 Fair Value

A definition of the term "fair value" is not within the Federal Power Act (FPA). For the purpose of providing an estimate of the fair value of the Project, OPC believes the best approximation of fair value is the cost to construct and operate a comparable power generating facility. If a takeover were proposed, OPC would calculate the fair value based on then-current conditions because of the high capital costs involved with constructing new facilities, the increase in fuel costs, and variability in the building material markets.

2.2 Net Investment

The FPA broadly defines net investment as the original cost of the Project, plus similar cost of additions and betterments, minus the sum of depreciation and other amounts. The net investment of the Project will be provided with the Final License Application.

2.3 Severance Damages

Severance damages are not unequivocally defined in the FPA but are generally those reasonable damages, if any, to property of the licensee valuable, serviceable, and which is then dependent for its usefulness upon the continuance of the license but not taken in the event of a federal takeover. All Project structures, facilities, equipment, and contractual obligations or requirements are required for the successful operation of the Project. OPC believes that potential severances inflicted by a federal takeover of the Project would be significant. Therefore, given the challenges of estimating damages associated with severance, OPC is reserving the right to provide the Commission with such an estimate should the Commission consider a federal takeover of the Project.

3.0 NEW DEVELOPMENT COSTS

OPC is not proposing any new development at the Rocky Mountain Project.

4.0 ESTIMATED AVERAGE ANNUAL PROJECT COSTS

Estimated average annual project costs will be included in the Final License Application.

4.1 Costs of Proposed Environmental Measures

OPC will provide a final proposal for protection, mitigation, and enhancement (PM&E) measures with the Final License Application. Any costs associated with the proposed PM&E measures will be included in the Final License Application.

5.0 ESTIMATED ANNUAL VALUE OF PROJECT POWER

The estimated annual value of project power will be included in the Final License Application.

6.0 SOURCES OF FINANCING

OPC is a not-for-profit electric cooperative whose principal business is providing wholesale electric services to its 38 retail electric distribution cooperative members (Members). Consequently, substantially all of OPC's revenues and cash flow is derived from sales to the Members pursuant to long-term, take-or-pay wholesale power contracts. These contracts obligate Members jointly and severally to pay all of OPC's costs and expenses associated with owning and operating its power supply business. To that end, OPC's existing rate structure provides for a pass-through of actual energy costs. Charges for fixed costs (including capacity, other non-energy charges, debt service obligations, and the margin required to meet OPC's Margin for Interest Ratio rate covenant) are carefully managed throughout the year to ensure that sufficient capacity-related revenues are produced. This rate structure provides OPC with the ability to manage its revenues to assure full recovery of its costs in rates and has resulted in a consistent record of meeting all of its financial requirements.

OPC's operations have consistently provided a sizeable contribution to its funding of capital requirements, such that internally generated funds have provided interim funding or long-term capital for nuclear reloads, general plant facilities, replacements and additions to existing facilities, expenditures for environmental compliance, and retirement of long-term debt. In the near term, OPC anticipates that it will continue to fund a portion of these types of capital requirements with funds generated from operations and, if necessary, with short-term borrowings. However, OPC is also pursuing long-term financing for these types of capital expenditures. OPC has historically obtained the majority of its long-term financing for capital requirements from loans funded by the Federal Financing Bank (FFB) and guaranteed by the Rural Utilities Service (RUS), a branch of the U. S. Department of Agriculture. In May 2023 OPC filed a $695 million loan application with the RUS to provide FFB funding for normal additions and replacements to generation facilities expected to be incurred in 2023 through 2026.

7.0 ESTIMATE OF COST TO DEVELOP LICENSE APPLICATION

An estimate of the cost to develop the license application will be included in the Final License Application.

8.0 VALUE OF PROJECT POWER

The value of project power will be included in the Final License Application.

9.0 ESTIMATED AVERAGE ANNUAL CHANGE IN GENERATION AND VALUE OF PROJECT POWER

The estimated average annual change in generation and value of project power will be included in the Final License Application.

OglethorpePower

Exhibit F

Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW

EXHIBIT F

GENERAL DESIGN DRAWINGS AND SUPPORTING DESIGN REPORT

This Material is Critical Energy Infrastructure Information (CEII).
Members of the Public may Obtain Nonpublic or Privileged Information by Submitting a Freedom of Information Act (FOIA) Request.

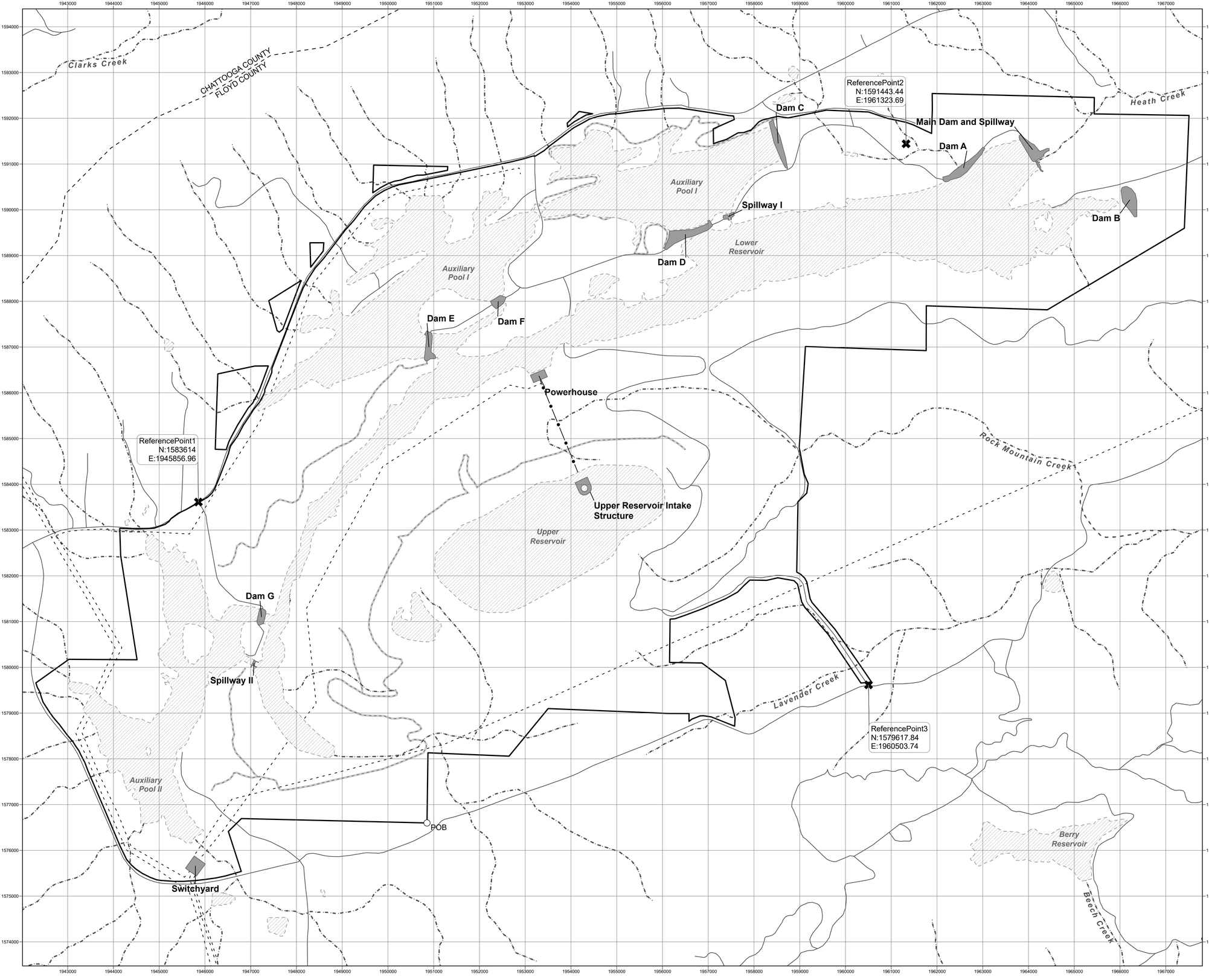
Exhibit G

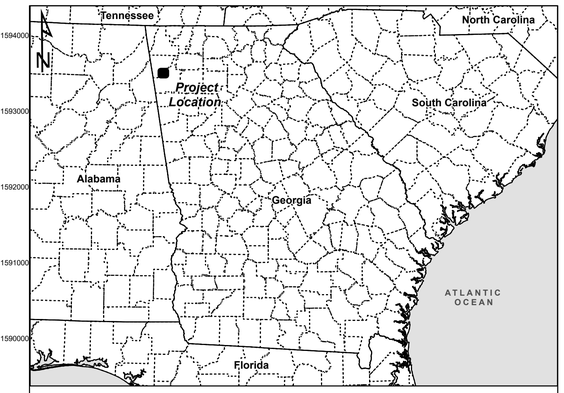
Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW





4.86°W
8/12/2022

Reference Points
POB
Hydrography
Penstock
Roads
Railroad
Transmission Line
Trail
Project Boundary
Project Features
Waterbody
County

Map notes:

1. The Rocky Mountain Project is located in the State of Georgia in Floyd County.
2. Reference Point coordinates are shown in NAD 1983 StatePlane Georgia West FIPS 1002 Ft US.
3. Licensee has acquired all flowage rights and title in fee or the right to use in perpetuity all lands necessary or appropriate for the construction, maintenance, and operation of the Project. All property records are kept on file with the licensee.
4. There are no federal lands within the Project boundary.
5. The Project boundary description, as required by 18 CFR 4.41, is represented here by a grid of Northings and Eastings around, and graticules within, the map frame. Any position in Northings and Eastings along the Project boundary can be determined using these references.
6. The Project boundary was digitized from metes and bounds described within the Project's original license.

OGLETHORPE POWER CORPORATION

ROCKY MOUNTAIN PUMPED STORAGE HYDROELECTRIC PROJECT
FERC NO. 2725
PROJECT BOUNDARY MAP

EXHIBIT G SCALE: 1" = 1,000' SHEET NO. 1 OF 1

0 500 1,000 2,000 3,000 4,000 Feet

FERC DWG. NO. 2725-

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
1-2	N88-30-14W	2540.50
2-3	N39-25-07W	1517.30
3-4	S43-01-11W	407.03
4-5	S18-27-49E	926.79
5-6	S76-56-42W	465.56
6-7	S80-52-04W R = 3755.86 ft.	514.27
7-8	S86-12-09W R = 3755.86	184.94
8-9	S89-22-24W R = 3755.86 ft.	230.96
9-10	N88-51-54W	249.83
10-11	N56-09-33W R = 1095.94 ft.	1251.13
11-12	N23-27-12W	1977.40
12-13	N66-32-48E	10.00
13-14	N23-27-12W	184.22
14-15	S66-32-48W	10.00

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
15-16	N31-21-26W R = 1960.98 ft.	541.03
16-17	N39-15-40W	289.10
17-18	N50-44-20E	10.00
18-19	N39-15-40W	200.00
19-20	S50-44-20W	10.00
20-21	N39-15-40W	120.11
21-22	N32-04-46W R = 1861.64 ft.	466.70
22-23	N65-06-09E	20.00
23-24	N21-54-01W R = 1861.64 ft.	192.68
24-25	S71-05-49W	20.00
25-26	N16-10-33W R = 1861.64 ft.	177.23
26-27	N54-58-58E	885.75
27-28	S89-08-52E	1492.78
28-29	N09-06-53W	2313.86

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
29-30	N01-56-35W	603.69
30-31	S84-38-42E R = 1849.26 ft.	11.51
31-32	S84-28-00E	142.76
32-33	N05-32-00E	10.00
33-34	S84-28-00E	124.27
34-35	N89-22-25E R = 1674.23 ft.	359.97
35-36	N83-12-51E	46.79
36-37	N69-14-20E R = 802.99 ft.	391.72
37-38	N55-15-49E	28.37
38-39	N34-44-11W	17.00
39-40	N55-04-49E	341.98
40-41	S41-18-51E	18.21
41-42	N55-17-32E	13.37
42-43	N57-54-53E R = 2840.57 ft.	262.85

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
43-44	N60-33-56E	241.77
44-45	N40-21-49E R = 755.13 ft.	532.50
45-46	N20-09-43E	704.56
46-47	N24-08-50E R = 1413.89 ft.	196.70
47-48	S61-52-02E	10.00
48-49	N30-10-24E R = 1403.89 ft.	100.00
49-50	N32-12-50E	893.02
50-51	N32-09-39E R = 1940.81 ft.	3.59
51-52	S57-53-32E	25.00
52-53	N27-33-45E R = 1965.81 ft.	311.90
53-54	N66-58-58W	25.00
54-55	N22-00-20E R = 1940.81 ft.	68.54
55-56	N20-59-38E	133.17
56-57	S69-00-22E	25.00

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
57-58	N20-59-38E	350.00
58-59	N69-00-22W	25.00
59-60	N20-59-38E	750.00
60-61	S69-00-22E	25.00
61-62	N20-59-38E	150.00
62-63	S69-00-22W	25.00
63-64	N20-59-38E	1002.18
64-65	N29-43-40E R = 1381.81 ft.	421.27
65-66	N38-27-42E	1810.36
66-67	N58-19-28E R = 1382.82 ft.	958.77
67-68	N78-11-15E	2464.66
68-69	N78-11-15E	80.92
69-70	N74-58-38E R = 1960.12 ft.	219.51
70-71	N68-48-16E R = 1960.12 ft.	203.12

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
71-72	S24-09-59E	30.00
72-73	N62-05-03E R = 1990.12 ft.	260.47
73-74	N31-39-55W	30.00
74-75	N56-01-59E R = 1960.12 ft.	157.49
75-76	N53-43-52E	664.97
76-77	N68-46-41E R = 1587.48 ft.	833.81
77-78	N83-49-31E	1268.40
78-79	S88-38-15E R = 1588.25 ft.	417.87
79-80	S81-06-01E	941.22
80-81	S84-54-03E R = 788.59 ft.	104.61
81-82	S07-14-42E	93.37
82-83	S66-19-58W	162.20
83-84	S66-18-43W	328.02
84-85	S02-18-45E	332.06

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
85-86	N79-10-36E	85.10
86-87	N26-59-48E	34.74
87-88	N73-46-23E	112.50
88-89	N71-13-58E	79.86
89-90	N62-05-57E	147.09
90-91	N57-26-54E	116.15
91-92	N85-08-01E	129.13
92-93	N72-07-53E	170.26
93-94	N46-20-23E	251.03
94-95	N55-52-17E	97.75
95-96	N75-38-17E	348.21
96-97	S60-30-24E	10.56
97-98	S80-42-24E R = 326.44 ft.	230.18
98-99	N79-05-35E	843.13

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
99-100	N86-51-21E R = 914.86 ft.	247.91
100-101	S85-22-52E	417.10
101-102	N04-37-08E	10.00
102-103	S83-08-46E	65.57
103-104	S83-41-48E	242.14
104-105	S71-11-02E	370.24
105-106	S79-49-14E	282.73
106-107	S72-43-03E	291.94
107-108	S64-15-56E	471.80
108-109	N01-30-22E	525.26
109-110	N02-08-18W	359.53
110-111	S88-37-40E	2752.44
111-112	S89-07-08E	793.65
112-113	S00-22-45E	365.19

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
113-114	S88-52-26E	2076.69
114-115	S02-02-24W	2473.48
115-116	S59-11-52W	3495.40
116-117	N88-11-49W	2630.40
117-118	S00-42-36W	991.24
118-119	N87-58-22W	2639.99
119-120	S03-16-15W	2215.44
120-121	S10-10-44E	591.67
121-122	S24-29-17E	213.84
122-123	S06-34-58W	215.71
123-124	S45-22-00W	268.04
124-125	S00-54-29W	1550.56
125-126	S59-17-19E	88.73
126-127	S46-33-08E	119.23

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
127-128	S28-20-59E	90.26
128-129	S12-50-53E	377.15
129-130	S28-49-35E	100.64
130-131	S10-31-39E	762.88
131-132	S34-06-02E	910.76
132-133	S33-21-39E	492.74
133-134	S86-31-55W	230.69
134-135	N33-21-39W	376.48
135-136	N34-06-02W	898.24
136-137	N40-31-39W	772.15
137-138	N28-49-35W	149.20
138-139	N12-50-53W	378.00
139-140	N28-20-59W	31.00
140-141	N46-33-08W	64.87

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
141-142	N59-17-19W	53.38
142-143	N81-54-03W	186.19
143-144	N79-40-22W	164.36
144-145	S77-19-19W	234.80
145-146	S89-52-35W	353.61
146-147	S82-21-30W	30.71
147-148	S55-15-54W	33.25
148-149	S44-21-07W	127.88
149-150	S58-46-04W	88.22
150-151	S37-41-43W	120.42
151-152	S58-44-38W	289.09
152-153	S68-27-31W	353.83
153-154	S63-13-30W	188.81
154-155	S69-07-28W	404.28

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
155-156	S70-48-09W	241.66
156-157	S85-56-41W	99.50
157-158	S01-08-47W	946.36
158-159	S88-12-49E	700.72
159-160	S53-46-46E	626.21
160-161	S14-44-37E	849.42
161-162	S01-07-12W	176.28
162-163	N68-38-32W	541.72
163-164	N86-28-13W R = 326.53 ft.	203.20
164-165	N14-17-54W	20.00
165-166	S70-02-53W R = 346.53 ft.	68.39
166-167	S64-23-38W	156.45
167-168	S65-16-31W R = 2809.65 ft.	86.44
168-169	N01-14-28E	163.20

Metes and Bounds Tract 1 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
169-170	N88-11-56W	450.31
170-171	N87-47-06W	2638.52
171-172	S39-02-54W	1336.98
172-173	N87-46-54W	1800.64
173-1	S01-16-02W	1497.89

Metes and Bounds Tract 2 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
16(B)-T2.1	N53-20-19W	83.24
T2.1-T2.2	N87-27-25W	227.01
T2.2-T2.3	N01-57-18E	1649.25
T2.3-T2.4	N78-19-47E	826.55
T2.4-T2.5	N88-54-48E	307.77
T2.5-T2.6	S20-59-38W	524.17
T2.6-T2.7	S22-45-47W R = 1840.81 ft.	113.68
T2.7-T2.8	N65-28-04W	25.00
T2.8-T2.9	S28-19-12W R = 1815.81 ft.	240.08
T2.9-T2.10	S57-53-32E	25.00
T2.10-T2.11	S32-09-39W R = 1840.81 ft.	3.41
T2.11-T2.12	S32-12-50W	146.50
T2.12-T2.13	N53-47-10W	25.00
T2.13-T2.14	S32-12-50W	450.00

Metes and Bounds Tract 2 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
T2.14-T2.15	S57-47-10E	25.00
T2.15-T2.16	S52-12-50W	296.52
T2.16-T2.17	S30-10-24W R = 1503.89 ft.	107.12
T2.17-T2.18	S61-52-02E	10.00
T2.18-T2.1	S24-36-02W R = 1493.89 ft.	184.18

Metes and Bounds Tract 3 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
63(C)-T3.1	N69-00-22W	100.00
T3.1-T3.2	N69-00-22W	25.00
T3.2-T3.3	S20-59-38W	66.81
T3.3-T3.4	N89-32-20W	63.57
T3.4-T3.5	N15-32-22W	701.09
T3.5-T3.6	N57-37-37E	856.83
T3.6-T3.7	S24-04-28W R = 1481.81 ft.	159.34
T3.7-T3.1	S20-59-38W	1002.18

Metes and Bounds Tract 4 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
PT. D-T4.1	N00-54-06E	164.04
T4.1-T4.2	S38-27-42W	443.12
T4.2-T4.3	N01-45-54W	536.60
T4.3-T4.4	S89-05-54E	295.09
T4.4-T4.1	S00-54-06W	184.75

Metes and Bounds Tract 5 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
PT. E-T5.1	N02-38-01E	103.26
T5.1-T5.2	S78-11-15W	588.28
T5.2-T5.3	N11-48-45W	25.00
T5.3-T5.4	S78-11-15W	300.00
T5.4-T5.5	S11-48-45E	25.00
T5.5-T5.6	S78-11-15W	157.12
T5.6-T5.7	S65-03-48W R = 1482.82 ft.	679.31
T5.7-T5.8	N01-14-54E	604.98
T5.8-T5.9	S89-04-59E	1624.63
T5.9-T5.1	S02-38-01W	81.00

Metes and Bounds Tract 6 Point 1 (1,576,515.84 N, 154,247.60 E) Start Point in NAD83 Georgia StatePlane West		
Course	**Bearing**	**Distance**
76(G)-T6.1	N84-40-43W	150.65
T6.1-T6.2	N02-13-58E	88.72
T6.2-T6.3	N46-36-51E	364.71
T6.3-T6.4	S84-43-55E	301.82
T6.4-T6.5	S62-53-26W R = 1687.48 ft.	539.52
T6.5-T6.1	S53-43-52W	112.67

OglethorpePower

EXHIBIT H

Rocky Mountain Pumped Storage Hydroelectric Project

November 2023

FERC No. 2725

Application for New License for Major
Water Power Project >5MW

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ACRONYMS

C	
cfs	cubic feet per second
F	
FERC	Federal Energy Regulatory Commission
FPA	Federal Power Act
FPC	Federal Power Commission
G	
GPC	Georgia Power Company
I	
ITS	Integrated Transmission System
M	
MW	megawatts
O	
OPC	Oglethorpe Power Corporation
P	
PSP	Public Safety Plan
S	
SERC	SERC Reliability Corporation
STID	Supporting Technical Information Document

1.0 INFORMATION TO BE SUPPLIED BY ALL APPLICANTS

1.1 Plans and Ability of the Applicant to Operate and Maintain the Project

Oglethorpe Power Corporation (OPC) intends to continue to operate and maintain the Project to provide peaking generation each day during periods of high customer demand, and to store energy produced by baseload plants and solar power plants during off peak periods by pumping water from the Lower Reservoir into the Upper Reservoir.

1.1.1 Plans to Increase Capacity or Generation

In 2005, OPC filed a license amendment application to upgrade the project turbines. Federal Energy Regulatory Commission (FERC) granted approval for the license amendment and the three turbines were upgraded between 2008 and 2011. The replacement of the turbines increased efficiency and increased generating capacity by approximately 70 MW.

OPC does not currently have any plans for future development or capacity increases at the Project.

1.1.2 Plans to Coordinate the Operation of the Project with Other Water Resource Projects

OPC does not coordinate the operation of the Rocky Mountain Project with other water resource projects and plans to continue to operate the Project within its own system.

1.1.3 Plans to Coordinate the Operation of the Project with Other Electrical Systems

OPC provides electricity to the grid through Georgia's Integrated Transmission System (ITS). The ITS is a 17,800+ mile network of integrated transmission assets almost exclusively located in the State of Georgia wherein each asset is individually owned, but all transmission assets are jointly planned and operated for the benefit of all ITS participating transmission owners.

1.2 Need for the Electricity Generated by the Project

The Project's primary function is to supply peaking power and reserve generation to fulfill the system requirements of its 38 member cooperatives and regional needs as projected by the SERC Reliability Corporation (SERC).

Additional information on Project need will be provided in the Final License Application.

1.2.1 The Reasonable Costs and Availability of Alternative Sources of Power

If a new license for the Project is not granted, alternative sources of power could be obtained by purchasing power from electricity markets operated in the region. Services to the grid would need to be provided by other existing projects, or in some other means by the system operator. Power could also be supplied through the construction of new power plants.

1.2.2 Increase in Costs if the Licensee is not Granted a License

If a new license for the Project is not granted, costs of replacing services produced by the Project would be passed to the consumer. This includes costs related to reduced efficiency of other projects because they would need to modify operations to meet daily demand. Resulting loss in efficiencies caused by varying plant generation would increase fuel usage (in addition to increased emissions) and additional rate increases passed on to the customer base. This would also include costs related to procurement of alternative power, through the market or construction of new power plants.

1.2.3 Effects of Alternative Sources of Power

1.2.3.1 Effects on Licensee's Customers

The primary purpose of the Project is to supply peak demand energy, operating reserves, capacity, regulation, and other ancillary services to the region. The Project provides important energy, operating reserves, and operational flexibility to meet system operation requirements. In many periods, this significant supply of operational flexibility has avoided the commitment of many other less flexible resources to provide for a more efficient system dispatch.

This ability to meet peak demand provides rapid response power resources to the grid to assure reliable operation and prevent regional blackouts. The Project's storage capability has other significant advantages. It can store renewable carbon-free energy from nuclear, solar, and hydro generation during periods of low demand for delivery during peak demand to avoid generation from gas and coal-fired units. In addition, the region's operation of a system with significant intermittent renewables, such as solar, will require fast response resources in the same manner as the Project currently does to fill the power gap when these sources are not producing power. It is expected that these intermittent

sources will continue to grow in the future including thousands of megawatts of solar energy.

The Project provides an important source of electricity during times of peak demand and fast start and fast ramping capability to manage system ramping needs. In order to replace this important service, the system would need to modify its management of energy production. Alternative sources of power may need to throttle their production levels, which could reduce their overall efficiency.

1.2.3.2 Effect on Licensee's Operating and Load Characteristics

Replacing the Project with an alternative facility would result in a change of the system load characteristics by reducing the available offline fast start reserve, peak demand generation and generation ramping and price responsive demand (pumps). The Project provides customers and the region with peak demand energy, capacity, operating reserves, ancillary and regulation services. The above services are beneficial to the reliability, efficiency, and affordability of the electric grid. The Project also provides the region with the ability to bring units to the electric grid quickly in support of a grid disturbance such as a loss of a major unit or other change of load occurrence.

1.2.3.3 Effect on Communities Served by the Project

The loss of the license for the Project would result in the loss of electrical generation to the state of Georgia and tax revenues for Floyd County of $3.1 million annually based on 2022 payments. The governmental entities affected by this loss of revenue would ultimately have to seek a reduction in expenses or an increase in other sources of revenue. Additionally, the Project is an important local employer, employing 39 individuals on site as of May 23, 2023, not including additional support personnel located remotely to the site but within the state. The loss of the license would also likely mean that the Project's recreational facilities would no longer be available to the community.

1.3 Reasonable Cost and Availability of Alternative Sources of Power

1.3.1 Average Annual Cost of Project Power

This information will be provided with the Final License Application.

1.3.2 Projected Resources Required to Meet Capacity and Energy Requirements

This information will be provided with the Final License Application.

1.3.3 Alternative Sources of Power Total Annual Cost, Basis of Projected Annual Cost, and Merits of Each Alternative

This information will be provided with the Final License Application.

1.3.4 Effect on Direct Providers of Alternative Power

OPC does not propose to change how the Project is currently operated; therefore, there is no effect on providers of alternative sources of power.

1.4 Effect of Power on Applicant's Industrial Facility

Not applicable.

1.5 Need of the Tribe for Electricity

Not applicable.

1.6 Impacts on the Operations and Planning of the Licensee's Transmission System of Receiving or Not Receiving the License

Power produced at the Project is distributed through Georgia's ITS. If the Project did not receive a new license, the ITS would continue to operate and distribute power as it currently does.

1.7 Statement of Need for Modifications to Existing Project Facilities or Operations

OPC is not proposing to modify existing project facilities or operations.

1.8 Consistency with Comprehensive Plans

Section 10(a) of the Federal Power Act (FPA), 16 U.S.C. §803(a)(2)(A), requires FERC to consider the extent to which a project is consistent with federal or state comprehensive plans for improving, developing, or conserving a waterway or waterways affected by the Project. On April 27, 1988, FERC issued Order No. 481 – A, revising Order No. 481, issued

on October 26, 1987, establishing that FERC will accord FPA Section 10(a)(2)(A) comprehensive plan status to any federal or state plan that:

- Is a comprehensive study of one or more of the beneficial uses of a waterway or waterways;
- Specifies the standards, the data, and the methodology used; and
- Is filed with the Secretary of the Commission.

The Project's consistency with applicable comprehensive plans is included in Exhibit E of the Final License Application.

1.9 Financial and Personnel Resources

OPC is one of the nation's largest wholesale power supply cooperatives, with more than $16 billion in assets and annual revenue exceeding $1 billion. OPC is owned by 38 retail electric distribution cooperative members (Members) in the state of Georgia, each of which has a take-or-pay wholesale power supply contract with OPC, under which OPC supplies the Members with a significant portion of their annual electric energy needs. These long-term wholesale power supply contracts provide the underpinning for OPC's financial strength.

As of May 5, 2023, OPC's senior secured debt ratings are BBB+ (Standard & Poor's), Baa1 (Moody's) and BBB (Fitch).

OPC has committed significant, highly trained, and experienced staff to the physical operation and maintenance of project facilities as well as to meeting the regulatory and compliance requirements of the project license.

Additional information on Financial and Personnel Resources will be added in the Final License Application.

1.10 Project Expansion Notifications of Affected Landowners

Not applicable.

1.11 Applicant's Electricity Consumption Efficiency Improvement Program

OPC is a not-for-profit generation corporation that is owned by 38 retail rural electric distribution cooperative members in the state of Georgia. OPC does not distribute

electricity directly to the consumer and, therefore, does not implement an electricity consumption efficiency improvement program.

Additional information on efficiency programs will be added in the Final License Application.

1.12 Indian Tribes affected by the Project

See Exhibit E, Section 3.2.8 Cultural and Tribal Resources for information on Indian Tribes affected by the Project.

2.0 INFORMATION TO BE PROVIDED BY AN APPLICANT WHO IS AN EXISTING LICENSEE

2.1 Measures Planned to Insure Safe Management, Operation and Maintenance of the Project

2.1.1 Description of Operation During Flood Conditions

Given the limited nature of project inflows from the upstream drainage area of Heath Creek, which is approximately 16.6 square miles at the Main Dam, high-flow operations are not significantly different from normal operations. However, the following table is a guideline to inflow/discharge amounts and the corresponding appropriate notifications that will be made during high flows. For the purposes of this table the assumed operating volume before inflow to the property is the target number for the corresponding date, and assumed lower reservoir elevation is 700 ft MSL.

Table 1 Notification Guidelines for High Inflow Conditions

Inflow (cfs)	Operating Guidelines	Expected Impacts	Organizations to be notified
≤ 20 cfs	Normal operations of units. If necessary, open 10" jetflow gate 1 to 10 inches. 10" opening = approx. 20 cfs	None	None
> 20 ≤ 320 cfs	Normal operations of units. If necessary, open 40" jetflow gate up to 40 inches. 40" opening = approx. 320 cfs	None	None
> 320 ≤ 360cfs	Normal operation of units. Open 1 radial gate 1 foot. 1' opening equals approx. 360 cfs.	None	None
> 360 ≤ 600 cfs	Normal operations of units. Open both radial gates 1'. One foot opening with both gates = approx. 600 cfs	Minor Downstream flooding	[1]Must notify FERC May need to notify Floyd Co. 911 and NWS for advisory purposes
> 600 ≤ 4000 cfs	Normal operations of units. [2] Open both radial gates up to 7'	More significant downstream flooding of Texas Valley Rd. and low-lying areas	[1]Must notify FERC Must Notify Floyd Co. 911 and NWS to provide information for local advisories

Inflow (cfs)	Operating Guidelines	Expected Impacts	Organizations to be notified
> 4000 up to 15000 cfs	Operation of units may need to be at discretion of Plant or Operations Manager depending on other factors. Open both radial gates up to 16 feet.[3]	Major flooding of downstream roads and property	Probable activation of EAP

[1] Contact FERC Atlanta Regional office with any flows above 360 cfs at the following numbers William J. Brown, P.E., Regional Engineer Office Telephone Number: (678) 245-3070 Cell Number: (706) 201-3509 Harold J. (Jeff) Holloway, P.E., Branch Chief Office Telephone Number: (678) 245-3006 Cell Number: (706) 389-0884 and Jonathan L. Burgess, P.E., Branch Chief Office Telephone Number: (678) 245-3063 Cell Number: (404) 924-5508

[2] Full Range generation will be unavailable if operating volume of 20250-acre feet is exceeded

[3] Higher flows greater than 15000 cfs will occur if lower reservoir is above 712 ft. msl. Up to the PMF elevation of 717.5 ft. msl. (It should be noted that the Main Dam as well as the other dams at Rocky Mountain are capable of withstanding or passing the probable maximum flood).

2.1.2 Description of Warning Devices Used to Ensure Downstream Public Safety

Warning devices located at the Project to ensure downstream public safety are detailed in the Public Safety Plan. Two sirens are provided on the Rocky Mountain site. One is located on the Upper Reservoir adjacent to the communications building. It is activated when the Emergency Action Plan is tested or implemented. The second siren is located at the Main Dam. It is activated when the Main Dam Spillway gates are raised to warn of increased water discharge into Heath Creek. Both sirens are tested every five weeks.

There are 243 warning signs at the Project. In addition, buoys are located at each of the ungated spillways on the recreation lakes. There are boat barriers associated with the buoys located at each of the ungated spillways on the recreation lakes. The buoys, barriers and signs provide adequate safety features for boaters.

2.1.3 Discussion of any Proposed Changes to the Operation of the Project or Downstream Development Affecting the Emergency Action Plan

OPC is not proposing any changes to project operation and no downstream development is planned to occur that would affect the Emergency Action Plan.

2.1.4 Description of Monitoring Devices and Programs to Detect Structural Movement or Stress

A description of monitoring devices and programs at the Rocky Mountain Project used to detect structural movement or stress is included in Appendix A of the Emergency Action Plan currently on file with FERC's Atlanta Regional Office.

2.1.5 Discussion of Employee and Public Safety at the Project

OPC maintains a Public Safety Plan (PSP) for the Project, which includes warning, caution, and information signs and devices of various types and at various locations at the public access facilities at the Rocky Mountain PFA, as summarized below and in Section 2.1.2.

Adequate street lighting and area lighting is provided throughout the site. Lights are provided on all of the area roadways, at the visitor's area, at the campground area, around the site buildings, and at all of the dams and spillways. Antioch Lake spillway is lighted by four streetlights to provide sufficient lighting of the spillway area. The Low Level Outlet Works at Antioch Lake is lighted by four street lights. Heath Lake spillway is lighted by four streetlights to provide sufficient lighting of the spillway area. The Low Level Outlet Works at Heath Lake is lighted by four street lights. The Main Dam is lighted by eight streetlights to sufficiently illuminate the area. Each of the three boat ramps open to the public has an associated streetlight. Public access to the recreation lakes is not permitted after dark.

Public access to the substations, powerlines, powerhouse, and specific outdoor electrical equipment is restricted by fencing. The Rocky Mountain Substation located on Fouche Gap Road is an ITS substation. Fencing and proper signage are provided by the ITS. The Texas Valley Substation located in proximity the Plant entrance road is a Georgia Power substation. Fencing and proper signage are provided by Georgia Power. Fencing has been installed around the Main Power Transformers at the Powerhouse as added precaution for public safety by restricting access.

Life preservers are located throughout the site where it might be necessary to aid someone in the water. A life ring is mounted at the Antioch Lake Lower Level Outlet Works. One life ring is mounted at the Heath Lake Lower Level Outlet Works. Two life rings are mounted downstream of the Main Dam Spillway and two additional life rings are mounted at the top of the dam. One life ring is mounted at each of the three Upper Reservoir Float Wells.

Three boat ramps have been provided for public access the recreation lakes. The East and West Boat Ramps provide access to Antioch Lake. Heath Lake Boat Ramp provides public access to Heath Lake. These boat ramps are located in the recreational lakes and away from any unsafe areas. Informational signs are posted at the boat ramps to inform the public of boating, fishing, and park rules.

In addition, law enforcement officers are employed by Rocky Mountain through a management agreement with the GDNR. The officers provide adequate enforcement of safety rules and regulations related to the general public.

A summary of incidents involving accidental or criminal death or injury to members of the public within the Project will be provided with the Final License Application.

2.2 Description of Current Project Operation

During normal daily operation of generating and pumping, the Upper Reservoir water level fluctuates between the normal maximum operating pool elevation of 1,392 ft MSL and the normal minimum operating pool elevation of 1,341 ft MSL. The active volume of the Upper Reservoir is 10,003 acre-ft of water, which is cycled between the Lower and Upper Reservoirs. During the generating cycle, the Lower Reservoir typically increases in elevation by 20 ft from approximately 690.5 ft MSL to 710.5 ft MSL.

In accordance with Article 34 of the existing license, the Project provides a continuous minimum flow release of 1.2 cubic feet per second (cfs) from the Main Dam (Lower Reservoir) into Heath Creek.

2.3 Discussion of the History of the Project and Record of Programs to Upgrade the Operation and Maintenance of the Project

On January 2, 1974, Georgia Power Company (GPC), the Rocky Mountain Project's original applicant, filed an application to construct, maintain, and operate the Project. By order dated January 21, 1977, the Federal Power Commission (FPC; predecessor to FERC) issued a major license approving the proposed Project. The license expires in December 2026. Because of unsuitable geological conditions at the approved site of the Lower Reservoir's main dam, GPC filed an amendment to its license on November 8, 1979, requesting FERC authorization to relocate the Lower Reservoir's main dam approximately 4,400 feet downstream of the original dam site. The proposed relocation required the construction of two smaller dams and a permanent diversion channel. By order issued June 10, 1983, FERC approved the proposed amendment. In December 1988, GPC sold an interest in the Rocky Mountain Project to OPC. OPC purchased 74.61 percent of the Project, leaving GPC with the remaining 25.39 percent. Project construction was completed in July 1995, providing 848 megawatts (MW) of capacity to OPC and GPC. In May 2011, OPC completed the last of three turbine upgrades at the Rocky Mountain powerhouse, increasing the

installed generating capacity to 904 MW. A complete history of the Project is included in Exhibit C.

2.4 Lost Generation Over the Last 5 Years Due to Unscheduled Outages

A summary of unscheduled outages over the last 5 years will be provided with the Final License Application.

2.5 Licensee's Record of Compliance

OPC makes a significant effort to comply with all articles in the existing license and any directives from the Atlanta Regional Office. When necessary, OPC requests additional time to complete work in progress. A list of non-compliance or license violation citations that have been issued during the existing license term is included in the table below.

Table 2 Non-Compliance Incidents

Date	Description of Non-Compliance/License Violations	Document Accession #
September 9, 2020	Overdue Supporting Technical Information Document (STID) Update	20200909-3024
December 23, 1996	Violation of License Article 40	19970114-0245
May 22, 1995	Violation of License Article 34	19950710-0029

2.6 Actions Affecting the Public

Actions affecting the public will be provided in the Final License Application.

2.7 Ownership and Operating Expenses that would be Reduced if the License were Transferred

Ownership and operating expenses that would be reduced if the Project license were transferred will be provided in the Final License Application.

2.8 Annual Fees for Use of Federal or Native American Lands

There are no Federal or Native American lands within the Project and therefore this section is not applicable.