



April 18, 2025

Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: Rocky Mountain Pumped Storage Hydroelectric Project  
FERC Project No. 2725-076  
Response to Additional Information Request**

Dear Secretary Reese:

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), co-licensee for the Rocky Mountain Pumped Storage Hydroelectric Project, FERC No. 2725 (Project), filed with the Federal Energy Regulatory Commission (FERC or Commission) a Final License Application (FLA) for the Project on December 6, 2024. On March 3, 2025, the Commission's Division of Hydropower Licensing issued a letter accepting the FLA for filing and requesting additional information. This submission responds to Commission staff's request.

**FERC Request**

1. Section 4.41(h)(2) of the Commission's regulations require that the map must show a project boundary enclosing all project works and other features that are to be licensed. The Exhibit G map shows 5 non-contiguous parcels along the northwest region of the project boundary labeled as tracts 2-6, respectively. These separate tracts are not shown or described in the Final License Application other than in Exhibit G. So that staff clearly understand the purpose, and management of these tracts, please describe:

- (a) why these tracts are separated from the rest of the project boundary;
- (b) what project purpose they serve; and
- (c) specifically, how they are managed.

**OPC Response**

Tracts 2-6 are dissected from the rest of the Project boundary by Big Texas Valley Road NW, which is a non-Project road owned and managed by Floyd County. OPC owns Tracts 2-6, which are mostly forested, and passively manages them as vegetation and wildlife habitat without forest thinning. Unlike the lands on the east/south side of Big Texas Valley Road NW, there are no Project works, facilities, or features on Tracts 2-6, which total approximately 48.97 acres. The tracts are not necessary for recreation, shoreline control, protection of environmental resources, or any other Project purposes. OPC does not have any ongoing license requirements on the tracts and is not proposing any Project activities on the tracts in the new license term.

Tracts 2-6 were originally acquired along with the other Project lands for construction of the Project and were separated from other lands as a result of relocation of Big Texas Valley Road

NW during construction. OPC retained Tracts 2-6 within the Project boundary for administrative convenience because they are part of the same tax map parcels as lands on the east/south side of Big Texas Valley Road NW. However, because Tracts 2-6 are no longer necessary for Project purposes, OPC now proposes to revise the Project boundary to remove them. With the removal of Tracts 2-6, the Project boundary will only include those lands with Project works, facilities, features, or lands that are needed for Project purposes in accordance with section 4.41(h)(2) of the Commission's regulations.

OPC's proposed revisions to the Project boundary are reflected in the revised Exhibit G submitted with this response. The revisions include a revised Exhibit G-1 (Project Boundary Map), and the removal from Exhibit G of the metes and bounds descriptions of Tracts 2-6 that were included in the FLA. Because Tracts 2-6 are not shown or described in the FLA other than in Exhibit G, no other changes to the FLA are required.

OPC will continue to own Tracts 2-6 and will continue to manage them as forest lands following their removal from the Project boundary. Given the modest proposed change to the Project boundary, and the fact that no agency or other entity has any ownership, management authority, or interest in the tracts, OPC determined that there was no agency or other entity with whom consultation would be necessary in the preparation of this response. OPC is providing a copy of this response to all parties on the distribution list.

Please contact Christina Barrows at (770) 270-7996 or [christina.barrows@opc.com](mailto:christina.barrows@opc.com) if you have any questions about this filing or if you need additional information.

Best regards,



Craig Jones  
Vice President, Environmental, Safety, and Regulatory Affairs

Attachment: Revised Exhibit G

cc: Suzanne Roberts, OPC  
Jeff Swartz, OPC  
Distribution List