

**BY ELECTRONIC FILING**

February 26, 2019

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
Mail Code: DHAC, PJ-12  
888 First Street, N.E.  
Washington, D.C. 20426

Re: **Priest Rapids Hydroelectric Project No. 2114- License Compliance Filing:**  
**Article 401(a)(19): Five Year (2019 – 2023) Total Dissolved Gas Abatement Plan**  
**Article 401(a)(23): Updated Quality Assurance Project Plan**

Dear Secretary Bose:

Please find enclosed Public Utility District No. 2 of Grant County, Washington's (Grant PUD's) five-year (2019-2023) total dissolved gas (TDG) abatement plan (GAP; 5-Year GAP). Grant PUD is also submitting, as an appendix to the 5-Year GAP, its updated Quality Assurance Project Plan (QAPP) for monitoring selected water quality parameters, including TDG, within the Priest Rapids Hydroelectric Project (Project).

On July 13, 2018 the Washington Department of Ecology (Ecology) approved Grant PUD's *Final Summary of Total Dissolved Gas Monitoring within the Priest Rapids Hydroelectric Project – Year 10 Report* (Year 10 Report; Appendix A), in which Grant PUD demonstrated that it had fully implemented the conditions of the Project's 401 Water Quality Certification (WQC) associated with TDG, and had achieved reasonable compliance with the TDG water quality standards. This triggered provisions consistent with Section 6.4.11(f) of the 401 WQC, which states that upon compliance with TDG standards an updated GAP be prepared and updated every 10 years thereafter. However, after discussions with Ecology it was agreed that more frequent updates to the GAP would be appropriate. Therefore, this compliance GAP will be updated every 5 years, and will include any applicable information on new or improved technologies and a review of any additional reasonable and feasible gas abatement options.

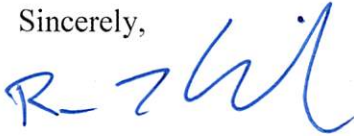
The originally required submittal date for a draft of the 5-Year GAP was October 31, 2018. This deadline was extended to December 31, 2018 per approval of Ecology (Appendix B). Grant PUD prepared and disseminated for comment a draft 5-Year GAP, as well as a draft of the updated QAPP, to Ecology, the Priest Rapids Coordinating Committee (PRCC), the National Marine Fisheries Service, and the United States Fish and Wildlife Service on December 11, 2018 for a 30 day review and comment period. Comments were received from Ecology, and a record of this consultation is included in Appendix D. The final 5-Year GAP and updated QAPP were submitted to Ecology on February 1, 2019. On February 21, 2019 Ecology approved the final 5-Year GAP and updated QAPP.

The final 5-Year GAP includes the following appendices, including:

- Appendix A: Ecology Approval Letter of Grant PUD's Final Summary of Total Dissolved Gas Monitoring within the Priest Rapids Hydroelectric Project – Year 10 Report (approved on July 13, 2018). This triggered the change from annual GAPs to 5-Year compliance GAPs.
- Appendix B: Ecology approval of Grant PUD's request for additional time to submit the draft 5-Year compliance GAP.
- Appendix C: Updated Quality Assurance Project Plan (QAPP); required under Section 6.7.1 of the 401 and Article 401(a)(23) of the Project license. The QAPP was last approved by Ecology and the Federal Energy Regulatory Commission (FERC) on January 30, 2009 and July 16, 2009<sup>1</sup>, respectively.
- Appendix D: Consultation record for the draft 5-Year GAP and updated QAPP, which includes emailed comments from Ecology and Grant PUD's responses to those comments.
- Appendix E: Ecology approval of the final 5-Year GAP and updated QAPP.

FERC staff with any questions should contact me at 509-793-1468 or rhendr1@gepud.org.

Sincerely,



Ross Hendrick  
License Compliance Manager

CC: Breean Zimmerman – Ecology  
PRCC Members  
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<sup>1</sup> 128 FERC ¶ 62,042 (2009)