



September 9, 2013

**VIA ELECTRONIC FILING**

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

Response to Preliminary Permit Application Deficiencies  
Guttenberg Water Power Project (FERC No. 13567-001)

Dear Secretary Bose:

The City of Guttenberg, Iowa (City) is the successive preliminary permit applicant for the proposed Guttenberg Water Power Project (FERC No. 13567) (Project). The City was granted an initial preliminary permit to study the feasibility of the proposed Project on July 27, 2010. The successive preliminary permit application was submitted to the Federal Energy Regulatory Commission (Commission) on July 1, 2013.

On July 25, 2013, the Commission issued a deficiency letter pertaining to the City's successive preliminary permit application. On behalf of the City, we herein electronically file the enclosed information, including application revisions, to address the deficiencies outlined in the Commission's Schedule A.

If you have any questions regarding this filing, please contact me at 207.416.1295.

Sincerely,

**KLEINSCHMIDT ASSOCIATES**

A handwritten signature in black ink, appearing to read "R. Dorman".

Randall J. Dorman  
Project Manager

RJD: TMJ

Enclosures

cc: Barry Dykhuizen, City Manager  
Dr. Russell Loven, Mayor  
Julie Smith, Iowa Association of Municipal Utilities  
Tim Konnert, FERC

Response to Deficiencies  
Schedule A

Request 1: *Section 4.81(a)(4) of the Commission's regulations requires, in part, that a municipality or state claiming preference under section 7(a) of the Federal Power Act must submit copies of applicable state or local laws or any other appropriate legal authority evidencing that the municipal authority is competent under such laws to engage in the business of developing, transmitting, utilizing, or distributing power. The portions of the Guttenberg City Charter provided in Appendix A of your application does not make clear that the City is authorized under state law to perform any of the four electric power functions i.e., developing, transmitting, utilizing, or distributing power. Please revise your application to include a copy of the relevant pages of the Guttenberg City Charter evidencing that you are a competent municipality authorized under applicable state law to engage in the business of developing, transmitting, utilizing, or distributing power.*

**Response:** Within the enclosed, revised application, we have included Chapter 2 and Chapter 111 of the Guttenberg City Code, in their entirety, which specifically demonstrate that the City is a competent municipality and provides for the development and operation of the municipally owned electric system, as well as the transmission of the power produced.

Request 2: *Section 4.81(b)(1) of the Commission's regulations requires, in part and to the extent possible, a description of the proposed project that includes the composition and dimensions of project features for proposed or existing dams, spillways, penstocks, tailraces or other structures that would be part of the project. Exhibit 1 states, on page 6, that the proposed project will be placed in the unused and inoperable auxiliary lock, however the dimensions of the auxiliary lock were not given. Also, Exhibit 1 states, on page 8, that the applicant assumes the installation of a traditional powerhouse with pit-type horizontal turbines but does not provide information on the composition and dimensions of the powerhouse. Please revise Exhibit 1 to include information on the dimensions and composition of the existing unused auxiliary lock and your best estimate of the composition and dimensions of the assumed powerhouse. Also, your application states, on page 11, that you plan to pursue low-head technology options in addition to the traditional powerhouse option, please indicate whether there would be proposed intake and tailrace structures associated with the traditional powerhouse option.*

**Response:** As described in the successive preliminary permit application, the City has investigated several options for development during the initial preliminary permit period, and continues to pursue these and additional options. The current options under consideration include a traditional powerhouse option or low-head technology options. At this time the traditional powerhouse option seems the most feasible approach and is the primary option under consideration. The traditional powerhouse, then, is what the revised application considers.

Regardless of the option pursued, generating equipment will be placed entirely within the existing inoperable auxiliary lock. Auxiliary lock dimensions are 110-feet wide by 280-feet long. These dimensions have been clarified on page 6 of the revised application.

As noted, Exhibit 1, page 8, describes the installation of a traditional powerhouse with pit-type, horizontal turbines. The powerhouse is anticipated to be a concrete structure located entirely within the footprint of the unused auxiliary lock, with dimensions smaller than the auxiliary lock, 110-feet wide by 280-feet long.

Waters of the Mississippi River would flow directly into the powerhouse as they enter the auxiliary lock. Waters exiting the powerhouse would flow directly back into the Mississippi River, and no tailrace structures are anticipated at this time.

**Request 3:** *Section 4.81(b)(3) of the Commission's regulations requires, in part and to the extent possible, that a proposed project include information on the estimated number, length, voltage, interconnections, age and condition of any primary transmission line(s) whether existing or proposed. Your preliminary permit application, on page 8, references the installation of a 69kV transmission line or another line of appropriate voltage for use within the applicant's municipal system but does not include information on the length of the line or potential location(s) of interconnection points. Please revise your application to include your best estimate of this information.*

**Response:** Preliminary investigations have indicated the potential for an interconnection to be made near River Park Drive, between Main Street and Prince Street, approximately 300 feet from the dam. As such, a new 69 kV line, approximately 300 feet in length will need to be constructed from the dam to the point of interconnection. This information has been updated within the application.

**Request 4:** *Section 4.81(d) of the Commission's regulations requires, in part, an Exhibit 3 that includes a map or series of maps that sufficiently, clearly, and legibly show the location of the project, relative locations and physical interrelationships of the principal project features, and a proposed project boundary that encloses all of the principal project features identified in Exhibit 1. Your Exhibit 3 shows the proposed project boundary to include the active lock and auxiliary lock; however, the project boundary does not include project features such as the powerhouse, proposed transmission line, and associated substation and/or interconnection point, any contemplated intake or tailrace structures, etc. Please revise your Exhibit 1, accordingly, to comply with section 4.81(d) of the Commission's regulations.*

**Response:** The project maps have been revised to include the location of the powerhouse. The Project boundary has also been revised to include the proposed transmission line to the point of interconnection.