



August 4, 2020

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

**RE: Au Train Hydroelectric Project – FERC #10856  
UP Hydro LLC  
Response to MDNR August 3, 2020 filing**

Dear Ms. Bose:

On behalf of UP Hydro LLC, licensee of the Au Train Project, Renewable World Energies, LLC (RWE) is submitting a response to a letter filed by the Michigan Department of Natural Resources (MDNR) on August 3, 2020.

On July 14, and July 16, 2020, RWE initiated consultation with MDNR, Michigan Department of Environment, Great Lakes and Energy (EGLE), and US Fish and Wildlife Service (USFWS), as required by the project Operations and Compliance Plan, regarding a 2-inch drawdown of the Project reservoir below licensed limits associated with RWE's proposed spillway upgrades. The consultation was requested as soon as knowledge that a drawdown would be needed and indicated that the proposed start date was August 14, or upon FERC approval of RWE's proposed spillway capacity upgrade request. RWE developed a drawdown plan and a stranded aquatic organism plan as a part of the request. On July 29, 2020 MDNR responded with comments to the plan. On July 30, 2020 RWE responded to the stakeholders that it would no longer need a drawdown beyond the licensed limits to complete the spillway upgrades and withdrew its request. In the time between July 14 and July 30, RWE has been working with a contractor to develop an efficient work plan to minimize costs of the upgrades while working within license requirements for operation and the environment. Working with the contractor determined that the need for a drawdown would no longer be required to complete the work and would eliminate the costly requirements for a 2-inch drawdown. RWE has also notified Commission staff that a 2-inch drawdown is no longer necessary.

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MDNR's concerns regarding the current water level trends are unfounded as the project operates in a modified run-of-river mode and allows the utilization of the reservoir's storage capacity. The minimum reservoir elevation per the license is 772.0 local datum. RWE has, and continues to operate the project within the license limits as described in the project Operation and Compliance Plan and will continue to do so.

A draft license surrender application was sent to stakeholders for comment on June 12, 2020 with a request for any comments by July 10, 2020. On July 17, 2020, a surrender application was filed with the Commission and addressed all comments received. The application was additionally sent to the official service list for the FERC project docket. On July 14, 2020, on behalf of RWE and UP Hydro, Ayres Associates submitted an EGLE/USACE Joint Permit Application for the requested construction activities. The permit application is currently under review.

If you have any questions concerning this submittal, please contact me at the Renewable World Energies, LLC offices @ 855-994-9376 Ext 102. I can also be reached by e-mail at [jason@rwehydro.com](mailto:jason@rwehydro.com).

Sincerely,  
**Renewable World Energies, LLC**  
**Agent for Licensee**



Mr. Jason Kreuzscher  
Vice President

CC:  
Elle Gulotty, MDNR  
Scott Hicks, USFWS  
Dan DeVaun, EGLE  
Ryan Mecone, EGLE  
Marissa Castello, EGLE  
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