

**FEDERAL ENERGY REGULATORY COMMISSION**  
**Office of Energy Projects**  
Division of Dam Safety and Inspections - Chicago Regional Office  
230 South Dearborn Street, Suite 3130  
Chicago, Illinois 60604  
312.596.4430 Office – 312.596.4460 Facsimile

In reply refer to: P-401, P-2551,  
P-2579, P-2651

September 14, 2022

VIA Electronic Mail

Mr. Gene F. Sirca, Jr., Ph.D., P.E., S.E.  
Chief Hydro Dam Safety Engineer  
American Electric Power  
gfsirca@aep.com

Re: Annual Spillway Gate Operation Certificates for Mottville, Buchanan, Twin  
Branch, and Elkhart Projects (FERC Nos. P-401, P-2551, P-2579, and P-2651)

Dear Mr. Sirca:

The FERC received the American Electric Power's (AEP's) Spillway Gate Operation Certificates for 2021 for the above-mentioned projects with a February 9, 2022 submittal.

The submittal includes the information requested in the reporting form regarding the annual requirements for complying with 18 C.F.R., Part 12, Subpart E, § 12.44, Testing spillway gates. A requirement under this regulation is that "at least once each year, each spillway gate at a project must be operated to spill water, either during regular project operation or on a test basis." The next Annual Spillway Gate Operation Certificates are due by **December 31, 2022**. We have the following comments regarding the submittal:

1. The "Date of Most Recent Detailed Inspection" column was blank for all certificates. A detailed gate inspection is required at least once every ten years for all Category 1 gates. This date should be provided in the next Annual Spillway Gate Operation Certificate. If the gates were replaced within the last ten years, this should be noted on the certificate.
2. The submittal indicates that Gate Nos. 3 through 10 for Mottville and Gate Nos. 1 through 9 for Elkhart had their last full open test in 2017. Category 1 gates are required to have a full open gate test performed at least once every five years.

The next Annual Spillway Gate Operations Certificates for these projects should include full open tests for these gates.

3. The “Purpose of Gate Discharge” column for all certificates list either “4” or “5”. Examples of what should be listed in this column are: annual test, full open test, flood passage, and maintenance.
4. According to the Twin Branch certificate, some gates were not tested due to being sealed for winter. It is a regulatory requirement that all gates be operated at least once during the year.
5. According to the certificates for Elkhart and Twin Branch, some of the gates were not operated due to issues with the concrete and side seals. We understand these gates are functional and are only to be operated if necessary. Both Elkhart and Twin Branch have repairs scheduled. We understand the gate seal and concrete issues will be addressed along with the upcoming repairs.
6. The signature and printed name of the operator conducting the test should be included on both pages in the two sections of the certificates for all projects.

To comply with 18 C.F.R., Part 12, § 12.54, spillway gates are to be operated on an annual basis. Responses to each of the above comments should be provided in the cover letter of the next Annual Spillway Gate Operation Certificate submittal, which is due by **December 31, 2022**. Note that our September 15, 2021 letter also included some of these comments.

Your submittals are to be filed with the Commission’s eFiling system at <https://www.ferc.gov/ferc-online/overview>. For all Dam Safety and Public Safety Documents, select Hydro: Regional Office and Chicago Regional Office from the eFiling menu. The cover page of the filing must indicate that the material was eFiled. For assistance with eFiling, contact FERC Online Support at [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov), (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

If you have any questions concerning this letter, you may contact Mr. Adam Christy at (312) 596-4462 ([adam.christy@ferc.gov](mailto:adam.christy@ferc.gov)) or me at (312) 596-4430.

Sincerely,

*for* Olaf Weeks, P.E.  
Acting Regional Engineer