



AN ALLETE COMPANY

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January 27, 2025

Mr. Kevin Griebenow, PE
Regional Engineer
Federal Energy Regulatory Commission
Chicago Regional Office
230 South Dearborn Street, Room 3130
Chicago, Illinois 60604

Electronically Filed

Re: Owner's Dam Safety Program (ODSP)
Blanchard Hydroelectric Project No. P-346
Winton Hydroelectric Project No. P-469
St. Louis River Hydroelectric Project No. P-2360
Prairie River Hydroelectric Project No. P-2361
Grand Rapids Hydroelectric Project No. P-2362
Sylvan Hydroelectric Project No. P-2454
Little Falls Hydroelectric Project No. P-2532
Pillager Hydroelectric Project No. P-2663
ALLETE, Inc., dba Minnesota Power (MP)

Dear Mr. Griebenow:

As requested in your letter dated March 4, 2024, Minnesota Power is submitting the Annual Review by Dam Safety Staff of our ODSP, and a revision to the Program addressing recent staff changes to the Dam Safety Organization Chart.

The results of the Annual Review were presented and discussed with senior management on January 13, 2025. They are summarized in the attached memorandum dated January 2, 2025. The memo also includes a status update on the audit recommendations from Barr Engineering's 2022 External Audit, most of the recommendations are complete.

The comments in your March 4 letter are addressed in the updated ODSP and Annual Review Memorandum. If you have any questions regarding this submittal, please contact me at (218) 355-2473.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Ryan'.

Matthew J. Ryan, PE
Chief Dam Safety Engineer

Enclosures: ODSP MP Dam Safety Staff Annual Review Memorandum (January 2025)
Minnesota Power ODSP Version 8.0 (January 2025)

cc: Bethany Owen, Minnesota Power
Josh Skelton, Minnesota Power
Nora Rosemore, Minnesota Power
Paul Undeland, Minnesota Power
Jamie Mehle, PE, Minnesota Power

MEMORANDUM

To: Dam Safety Steering Committee
Bethany Owen, Josh Skelton, Todd Simmons, Nora Rosemore, Paul Undeland, Bill Carlson,
Nicholas Peterson, Tim Melby, Kent Ogston

Date: January 2, 2025

From: Matt Ryan and Jamie Mehle

Re: Owners Dam Safety Program (ODSP)
Minnesota Power (MP) Dam Safety Staff Annual Review &
Status Report of 2022 External Audit Recommendations

Background

The FERC requires an annual review of MP's ODSP by our dam safety staff, 18 CFR § 12.64 reads:

"The Owner's Dam Safety Program, and the implementation thereof, shall be reviewed at least once annually by the licensee's dam safety staff and discussed with senior management of the Owner's organization. The licensee shall submit the results of the annual review, including findings, analysis, corrective measures, and/or revisions to the Owner's Dam Safety Program, to the Regional Engineer."

The results are summarized below, they are due to the FERC on January 31, 2025, along with a revision to the ODSP and a status report of the 2022 ODSP External Audit Recommendations.

Annual Review Results

Section 1 - Introduction:

1. The introduction, purpose, and scope of the ODSP are relevant, concise, and effectively introduce the ODSP. No changes are needed.

Section 2 – Terms and Conditions:

1. All were found to be relevant and correct. No changes are needed.

Section 3 – Dam Safety Policy, Objectives and Expectations:

1. The employees, consultants and contractors involved in MP's hydro facilities understand the importance of dam, public and personal safety, and operational compliance above all other performance goals. This understanding was confirmed by the 2022 external audit performed by Barr Engineering. It will continue to be reiterated in regular dam safety trainings and in how work is done on a daily basis.

Section 4 – Organization and Responsibilities:

1. Updates to the personnel listed in the plan and the organization chart in Appendix C have been made as part of the ODSP revision to reflect recent reorganization at MP.
2. Dam Safety and Hydro Operations personnel demonstrate a good understanding of their roles and responsibilities and continuously strive for improvement. There are new employees in Dam Safety and Hydro Operations therefore there is a renewed focus on training and mentoring.
3. The minor edits to this section recommended in the 2022 external audit were made in Version 7.0 of the ODSP. This recommendation is **complete**.
4. A recommendation from the 2022 external audit is for the Dam Safety staff to be trained on the FERC's Risk Informed Decision Making (RIDM) approach. Matt Ryan, Kyle Maher, Dave Aspie, Nora Rosemore, Tim Melby and Dan Nordling attended the Introduction to USACE SQRA & FERC L2RA Guidelines Training Course in July 2023. Additionally, MP has gained significant hands-on experience during the risk analyses for our Fish Lake Reservoir (L2RA, 2023), Pillager (L3RA, 2024) and Sylvan (L3RA, 2024) facilities. This recommendation is **complete**.

Section 5 – Dam Safety Training:

1. Dam safety training is provided regularly for Hydro Operations personnel. The trainings regularly focus on dam safety and Emergency Action Plans (EAPs) and occasionally the ODSP. Feedback from the trainings is that they continue to be effective.
2. Regular review of lessons learned from the 2012 flood was a recommendation of the 2022 external audit. They were reviewed as part of the spring 2023 dam safety training. This recommendation is **complete** and will continue to be part of future dam safety trainings.
3. Another recommendation from the audit is to provide a summary of the updated FERC regulations and the effect they have on Hydro. Other training topics took priority in 2023 and 2024, this content is planned for training in 2025 along with the ODSP. This recommendation is **in progress**.

Section 6 – Communications and Reporting:

1. The ALLETE/MP corporate culture is very conducive to the necessary communication and reporting required for Dam Safety. Communication is not restricted and flows freely between the parties that need to be aware of dam safety issues. The ODSP formalizes the process, and it is followed by those whose primary job duties are Dam Safety and Hydro operations.
2. The 2022 external audit included a recommendation to leverage the Dam Safety Steering Committee's role for greater awareness of the benefits and accomplishments of the ODSP and clarify it in the written document. An idea that came out of discussion with the Steering Committee regarding this recommendation, during the June 1, 2023, meeting, is to formalize how the steering committee gets notified and to clarify their role during EAP activations. The Dam Safety Team reviewed this recommendation during the most recent EAP updates and more discussion with the Steering Committee is necessary and planned for the January 2025 meeting. This recommendation is **in progress**.

Section 7 – Assessments and Audits:

1. The ODSP is reviewed at least annually by dam safety staff. The results of the 2022 external audit confirmed MP's commitment to Dam Safety and included recommendations which are listed, including a status update, in this annual review summary.

Section 8 – Record Keeping:

1. Record keeping requirements are well followed. Improvements to the organization and naming convention methods are continually sought for efficiency improvements. No changes to the ODSP are needed.

Section 9 – References:

1. References were reviewed and checked. All were found to be correct and included. No changes to the ODSP were needed.

Other 2022 External Audit Recommendations:

1. Work towards greater alignment between ALLETE's Security and Emergency Management (ASEM) department and Hydro's EAPs. ALLETE's Emergency Manager, David Baker, organized and lead the annual meetings with the primary Emergency Management Agencies (EMA) in 2024. David was presented as the primary point of contact for everything Emergency Management related. ASEM and Dam Safety are beginning to plan the EAP Exercises for the Thomson Development to be held by 2026. This recommendation is **complete** and will continue to be part of ALLETE's overall emergency management structure.
2. Dam Safety Surveillance and Monitoring Plan (DSSMP) updates and establish Dam Safety Surveillance and Monitoring Report (DSSMR) alignment with the updated DSSMPs. Updates for the Little Falls, Sylvan, Pillager, Grand Rapids, Fish Lake, and Scanlon DSSMPs are complete. The corresponding DSSMRs were revised subsequently to document any monitoring changes. This recommendation is **ongoing** and is expected to take several years.