

Appendix 2 – Amended Exhibit A

**Gile Flowage Storage Reservoir Project
FERC Project No. 15055**

**Amended Exhibit A
Description of Project**

Final License Application

Prepared for

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a Wisconsin Corporation

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TABLE OF CONTENTS

	Page
1. Introduction	1
2. Description of Dam Structures	1
2.1 West Earthen Embankment	1
2.2 Concrete Spillway Section	2
2.3 East Earthen Embankment	3
3. Description of Storage Reservoir	3
4. Description of Conveyance System	3
5. Description of Powerhouse	4
6. Tailwater	4
7. Transmission Equipment	4
8. Appurtenant Equipment	4
9. Project Operation	4
10. Safe Management, Operation, and Maintenance	7
11. Average Annual Generation	7
12. River Flow Characteristics	7
13. Estimated Project Cost	8
14. Estimated Costs of Proposed Environmental Measures	8
15. Purpose of the Project	9
16. License Application Development Costs	9
17. Estimated Value of On-Peak Power and Off-Peak Power	9
18. Average Annual Increase or Decrease in Project Generation and Value of Power Due to Changes in Project Operations	9
19. Remaining Undepreciated Net Investment, or Book Value of the Project	9
20. Annual Operation and Maintenance Costs	10
21. One-Line Diagram of Electric Circuits	10
22. Lands of the United States	10
23. Public Utilities Regulatory Policy Act	10
24. Supporting Design Report	11
25. Works Cited	11

TABLES

Table A-1	Estimated Capital and Annual O&M Costs for Proposed Environmental Measures at the Gile Project.....	8
Table A-2	Annual Operation and Management Costs.....	10
Table A-3	Cost Breakdown of General O&M Expense Category (2018 to 2022)	10

FIGURE

Figure A-1	Gile Flowage Storage Reservoir Elevations for the Years 1994 to 2021	5
Figure A-2	Stage-Storage Curve for the Gile Flowage Storage Reservoir	6
Figure A-3	Stage-Area Curve for the Gile Flowage Storage Reservoir	6

APPENDICES

Appendix A-1:	Gile Flowage Storage Reservoir Project Location
Appendix A-2:	Gile Flowage Storage Reservoir Project Facilities
Appendix A-3:	Gile Flowage Storage Reservoir Flow Duration Curves

LIST OF ABBREVIATIONS

cfs.....	cubic feet per second
FERC.....	Federal Energy Regulatory Commission
FLA.....	Final License Application
NGVD.....	National Geodetic Vertical Datum of 1929
NSPW.....	Northern States Power Company, a Wisconsin corporation
O&M.....	Operation and management
Project.....	Superior Falls Hydroelectric Project
USGS.....	United States Geological Survey
WDNR.....	Wisconsin Department of Natural Resources

1. Introduction

Northern States Power Company, a Wisconsin corporation (NSPW), is the owner and operator of the Gile Flowage Storage Reservoir Project (Gile Project or Project). The Project was constructed in 1940 to store water for downstream generation at NSPW's Saxon Falls (FERC No. 2610) and Superior Falls (FERC No. 2587) hydroelectric projects. The Gile Project is currently unlicensed and no new development is proposed.

The Project is located on the West Fork of the Montreal River approximately 8 river miles upstream of the confluence with the main branch of the Montreal River and approximately 20 miles upstream of the Saxon Falls Hydroelectric Project. The Project is located within the Towns of Pence and Carey, Iron County, Wisconsin and approximately 2.5 miles southwest of the neighboring Cities of Hurley, Wisconsin and Ironwood, Michigan and approximately 33 miles southeast of the City of Ashland, Wisconsin. The watershed above the Gile Dam is approximately 70 square miles.¹ **Appendix A-1** of this application includes a map illustrating the general location of the Project.

Appendix A-2 includes an aerial photograph depicting the Project's primary structures and facilities. The Project works consist of (1) a 32.5-foot-high² and 903-foot long earthen and concrete dam that includes a west earthen embankment, a concrete spillway section, an east earthen embankment; (2) a storage reservoir with a maximum surface area of 3,325 acres³ and a maximum gross storage capacity of approximately 32,713 acre-feet⁴ at an elevation of 1490.0 feet National Geodetic Vertical Datum of 1929 (NGVD);⁵ and (3) appurtenant facilities.

A detailed description of each structure is provided in the following paragraphs. The Project boundary is provided in Exhibit G of this application.

2. Description of Dam Structures

The multi-section dam has a total length of 903 feet, a maximum height of 32.5 feet⁶ and a maximum cross-sectional width at the base of the concrete spillway section of 144 feet.⁷ The different sections, from left to right looking downstream, consist of a west earthen embankment, a concrete spillway section, an east earthen embankment, and appurtenant facilities.

2.1 West Earthen Embankment

The west earthen embankment is approximately 300 feet long with a maximum height of 32.5 feet⁸ and a crest elevation of 1495.0 feet NGVD. It has a 10-foot-wide crest with 3:1 (H:V) upstream slope and 2.5:1 downstream slope. The east side of the west embankment is connected to the concrete spillway section

¹ Unless otherwise noted, all information in was derived from the 2016 Consultant Safety Inspection Report for Gile Reservoir Dam-WDNR Field File No. 26.09 completed by Ayres Associates (Ayres Associates, 2016).

² From the bottom of the cutoff key to the top of the operator's deck as shown in Exhibit F.

³ Excludes 29.0 acres of islands currently owned in fee by NSPW that were originally included in the proposed project boundary as part of the reservoir. NSPW is now seeking to transfer ownership of the islands to Iron County; therefore, the reservoir acreage was recalculated in 2024 using GIS and the most current LiDAR information to exclude all islands above elevation 1490.0 feet NGVD. The recalculated acreage results in a less than one percent change in reservoir size and is insignificant with respect to the stage-storage curves and flow routing model results. Therefore, the stage-storage curves and model runs, and the analyses derived therefrom, have not been updated with the revised reservoir acreage.

⁴ Calculation was derived from the updated bathymetric map included as Figure 10 of the Aquatic and Terrestrial Invasive Species Study Report (GAI Consultants, 2022).

⁵ NGVD is assumed to be the same datum as mean sea level.

⁶ From the bottom of the cutoff key to the top of the operator's deck as shown in Exhibit F.

⁷ From the upstream face of the upstream wing wall to the downstream face of the downstream wing wall.

⁸ From the bottom of the cutoff key to the top of the operator's deck as shown in Exhibit F.

by the west concrete abutment. The abutment is comprised of three sections, the upstream wing wall, the spillway abutment, and the downstream wing wall. The upstream wing wall is approximately 54 feet long and 21 inches wide. The spillway abutment is approximately 58 feet long and 21 inches wide. The downstream wing wall is 13 feet long and 15 inches wide and is supported by buttresses. The maximum cross-sectional width at the base along the west side of the concrete spillway section is approximately 144 feet.⁹ Beginning at the west side of the concrete spillway, the earthen embankment contains a steel sheet pile cutoff wall with a top elevation of 1493.0 feet NGVD that extends approximately 200 feet to the west. The upstream side of the embankment is protected by riprap on filter fabric to elevation 1493.0 feet NGVD. The downstream portion of the embankment near the tailwater is also protected with riprap. A drain system consisting of a 4-inch diameter vitrified clay header pipe and transverse laterals spaced 14 feet on center extends from the sheet pile cutoff wall to the downstream toe. A drainage ditch collects water from the drains and conveys it to the tailwater.

2.2 Concrete Spillway Section

The 27.6-foot-long¹⁰ concrete spillway section, with a maximum height of 32.5 feet¹¹, is a reinforced concrete gravity structure with a left (west) abutment, a sluiceway bay (with a 6-foot wide by 6-foot high slide gate and a rectangular outlet approximately 35 feet long, 6 feet wide and 5 feet high with an invert elevation of 1465.5 feet NGVD), a radial gate bay, and a right (east) abutment. A steel sheet pile cutoff wall is located under the structure along the upstream side of the radial gate spillway. Much of the structure is founded on wood piles. A concrete operator's bridge spans the structure at a top elevation of 1495.0 feet NGVD. The maximum discharge capacity of the gated spillway is 2,200 cfs.

The sluiceway bay normally acts as a minimum flow release structure; however, it also serves to pass water downstream during periods of high flow and during winter conditions. It is separated from the gated spillway by a pier with a length and width of 42 feet and 2 feet respectively. The sluiceway is 37 feet long and features a trash rack with a clear spacing of 2.625 inches¹² and has the ability to pass a maximum flow of approximately 1,000 cfs.¹³ The trashracks are typically raked once or twice per year.

The radial gate bay is a hollow structure with foundation drains and a crest elevation of 1478.0 feet NGVD. The steel radial gate is 16 feet wide and 12 feet high and is operated with an electric hoist located inside the gatehouse. The top of the closed radial gate has an elevation of 1490.0 feet NGVD.

A concrete slab supports the rollway and downstream walls and forms the bottom of the stilling basin. The upstream wing walls and downstream wing walls are constructed at a 15-degree flare and 12-degree flare, respectively, to the centerline of the water flow. The wing walls vary in height to match the embankment cross-section. Buttresses are located on the outside of the wing walls and concrete strut beams brace the downstream walls. Weep holes are located at various locations through the wing walls.

⁹ From the upstream face of the upstream wing wall to the downstream face of the downstream wing wall.

¹⁰ As shown in Exhibit F.

¹¹ From the bottom of the cutoff key to the top of the operator's deck as shown in Exhibit F.

¹² Specifications for the bars and spacings as shown on the 1940 design drawing (NSP Drawing Nos. NH-238101-5 and 16). The top of the trash racks are sloped 20 degrees downstream from vertical, with a bar thickness of 0.375 inches. The rack is submerged at normal headwater elevation and it is supported by the dam structure on the top, one 0.75 foot-high I-beam support, and a notch in the concrete foundation at the bottom, 4 inches high. There are no other frame supports. The spacing of the bars is held in place by five horizontal, 0.875-inch diameter tie rods passing through each 0.375-inch bar and welded in place. However, only three of the horizontal tie bars restrict flow beyond the restrictions provided by the other supports. The effective vertical height of the trash rack is 16 feet minus 1.3 feet or 14.7 feet. The effective width is 6 feet minus 0.75 feet or 5.25 feet. This results in an effective opening of approximately 77 square feet. Due to the size of the spacing, the rack does not require raking.

¹³ NSPW Proposed Study Plan Clarifications eFiled with the Commission on May 3, 2021 (NSPW, 2021a; NSPW, 2021b).

The elevation of the top of stilling basin floor is 1465.5 feet NGVD. A 2.5-foot-high concrete weir approximately 30 feet long¹⁴ extends between the wing walls and is 3.25 feet wide at its base, 1.5 feet wide at its top, and has a crest elevation of 1468.0 feet NGVD.

Constructed on the operator's deck of the concrete spillway section is a 27.5-foot-wide and 11.8-foot-high gate house constructed of brick and extending approximately 10.5 feet downstream of the operator bridge.¹⁵ The gate house provides security and protection for the two electric gate hoists. The gate house dimensions are obtained from the Exhibit F Drawings.

2.3 East Earthen Embankment

The east earthen embankment is approximately 575 feet long with a maximum height of 32.5 feet¹⁶ and a crest elevation of 1495.0 feet NGVD. It has a 10-foot-wide crest with 3:1 upstream slope and 2.5:1 downstream slope. The west side of the east embankment is connected to the concrete spillway section by the west concrete abutment. The abutment is comprised of three sections, the upstream wing wall, the spillway abutment, and the downstream wing wall. The upstream wing wall is approximately 66 feet long and 15 inches wide. The spillway abutment is approximately 27 feet long and 2 feet wide. The downstream wing wall is 33.5 feet long and 15 inches wide and is supported by buttresses. which is approximately. The maximum cross-sectional width at the base along the east side of the concrete spillway section is approximately 144 feet.¹⁷ Beginning at the east side of the concrete spillway, the earthen embankment contains a steel sheet pile cutoff wall with a top elevation of 1493.0 feet NGVD that extends approximately 330 feet to the east. The upstream side of the embankment is protected by riprap on filter fabric to elevation 1493.0 feet NGVD. The downstream portion of the embankment near the tailwater is also protected with riprap. A drain system consisting of a 4-inch diameter vitrified clay header pipe and transverse laterals spaced 14 feet on center extends from the sheet pile cutoff wall to the downstream toe. A drainage ditch collects water from the drains and conveys it to the tailwater.

3. Description of Storage Reservoir

The Gile Flowage Storage Reservoir was constructed in 1940 to store water for use in downstream hydroelectric generation. It has a surface area of approximately 3,325 acres¹⁸ with a gross storage capacity of 32,713 acre-feet at an elevation of 1,490 feet NGVD. It has a maximum depth of 25 feet¹⁹ and an average depth of 9.75 feet.²⁰ The reservoir has a usable storage capacity of 32,031 acre-feet under the current operating range of 1,475 to 1,490 feet NVGD.

4. Description of Conveyance System

Water is released from the Project directly downstream into the West Fork of the Montreal River. There is no water conveyance system.

¹⁴ Measured at the downstream side.

¹⁵ Deck elevation is 1495.0 feet NGVD.

¹⁶ From the bottom of the cutoff key to the top of the operator's deck as shown in Exhibit F.

¹⁷ From the upstream face of the upstream wing wall to the downstream face of the downstream wing wall.

¹⁸ Excludes 29.0 acres of islands currently owned in fee by NSPW that were originally included in the proposed project boundary as part of the reservoir. NSPW is now seeking to transfer ownership of the islands to Iron County; therefore, the reservoir acreage was recalculated in 2024 using GIS and the most current LiDAR information to exclude all islands above elevation 1490.0 feet NGVD. The recalculated acreage results in a less than one percent change in reservoir size and is insignificant with respect to the stage-storage curves and flow routing model results. Therefore, the stage-storage curves and model runs, and the analyses derived therefrom, have not been updated with the revised reservoir acreage.

¹⁹ Maximum depth from WDNR Find a Lake webpage (WI Department of Natural Resources, n.d.).

²⁰ 32,713 acre-feet of volume divided by 3,354 acres of area.

5. Description of Powerhouse

There is no powerhouse or generating equipment associated with the Project.

6. Tailwater

The tailwater downstream of the dam has a maximum depth of six feet, a maximum width of approximately 135 feet, and extends downstream from the concrete apron of the dam for approximately 60 feet.²¹

7. Transmission Equipment

The Project is a storage reservoir and there is no transmission equipment associated with the Project.

8. Appurtenant Equipment

Appurtenant facilities at the Project include, but are not limited to, gate hoists and monitoring equipment.

9. Project Operation

The Project reservoir is operated between a minimum elevation and maximum elevation of 1,475 and 1,490 feet NGVD, respectively. A minimum flow of 10 cfs is released year-round. NSPW conserves water at the Project by regulating releases from the Gile Dam such that the water released, when combined with the flow in the main branch of the Montreal River, allows the downstream hydroelectric projects to operate efficiently without passing additional water (i.e., flows in excess of the hydraulic capacity of the powerhouses) over the spillway or through the radial gates.

When the volume of water released from the Gile Dam, when combined with the flow in the main branch of the Montreal River, exceeds the maximum hydraulic capacities of Saxon Falls and Superior Falls powerhouses, this excess water must be passed via the spillways or through the radial gates and is considered “over releasing”. Over releases that do not serve a Project purpose can have an adverse impact upon recreational and environmental resources at the Gile Flowage. Therefore, NSPW avoids “over releasing” through closely regulating discharge from the Gile Dam.

Water stored at the Gile Flowage is reserved for project purposes.²² NSPW restricts the typical drawdown of the reservoir to approximately 0.1 feet per day, but no more than 0.2 feet per day, to balance the needs of generation with the needs of recreation and the aquatic environment.²³ To determine inflow into Gile Flowage, NSPW monitors changes in reservoir elevation with discharges from the dam according to gate opening and storage reservoir elevation curves. This information is used to determine inflows from stage storage curves and correlation tables. NSPW then calculates the amount of discharge necessary for the most efficient generation downstream and adjusts the flows accordingly.

The annual summer drawdown begins around May 1 and the annual winter drawdown typically begins around December 1 as shown in **Figure A-1**. A review of elevation data at the Gile Project from 1994 to 2016 showed that summer drawdowns ranged from 4.2 to 7.6 feet in years with normal precipitation, 4.7 feet to 10 feet during dry years and 1.6 feet to 7.4 feet during wet years. Winter drawdowns ranged from 4.6 feet to 8 feet during years with normal precipitation, 5.8 feet to 9.5 feet during dry years, and 2.8 feet to 9.4 feet during wet years. **Figures A-2** and **A-3** show the stage-storage curve and the stage-area curve for the Gile Flowage.

²¹ Length and width of tailwater measured via Google Earth.

²² Project purposes include power generation and environmental mitigation or enhancement measures proposed in Exhibit E.

²³ Except for scheduled whitewater releases and emergencies beyond NSPW's control, which include but are not limited to preemptive reservoir drawdowns necessary for dam safety concerns or to accommodate major runoff events to reduce the risk of downstream flooding.

Figure A-1 Gile Flowage Storage Reservoir Elevations for the Years 1994 to 2021

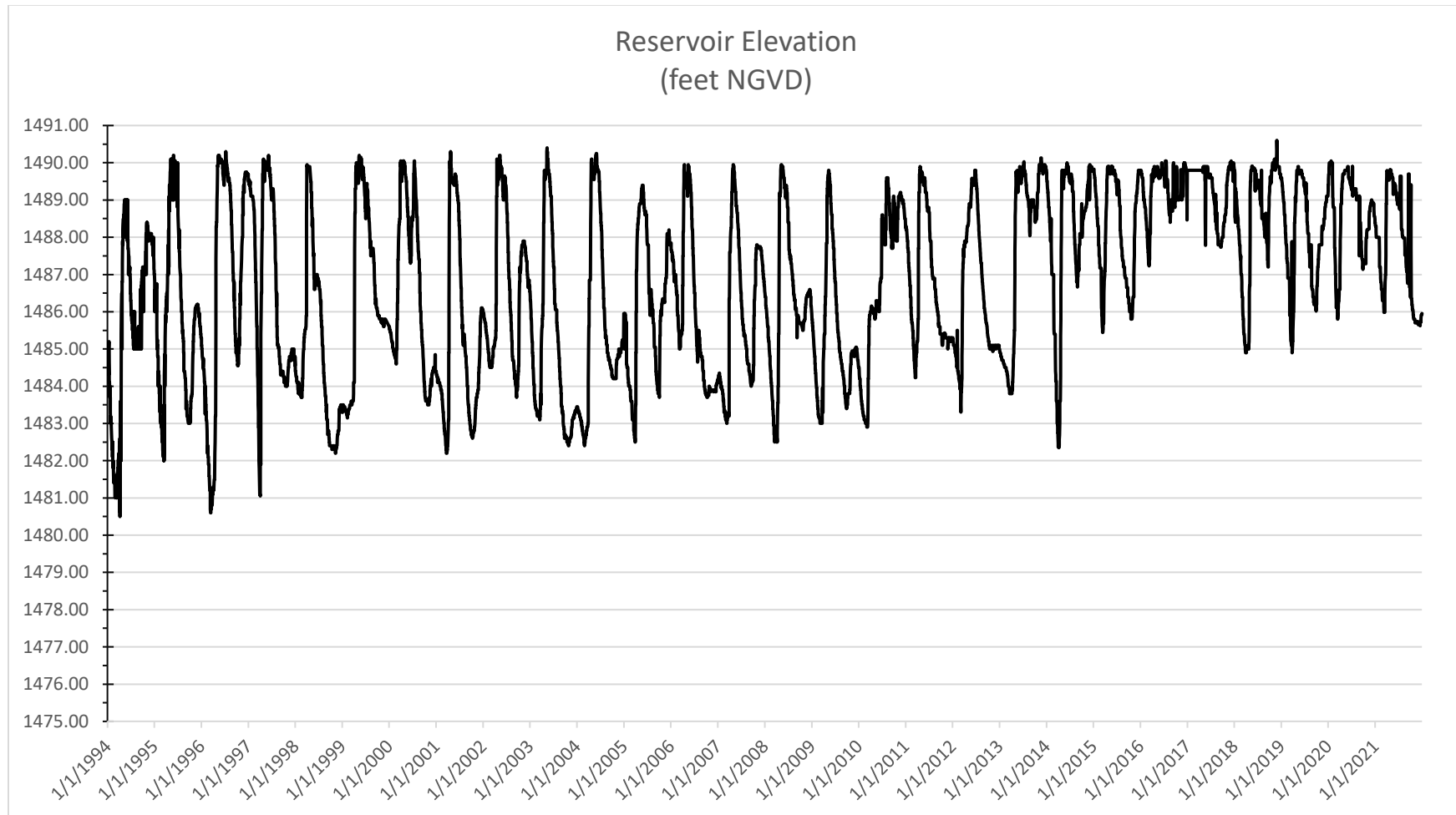


Figure A-2 Stage-Storage Curve for the Gile Flowage Storage Reservoir

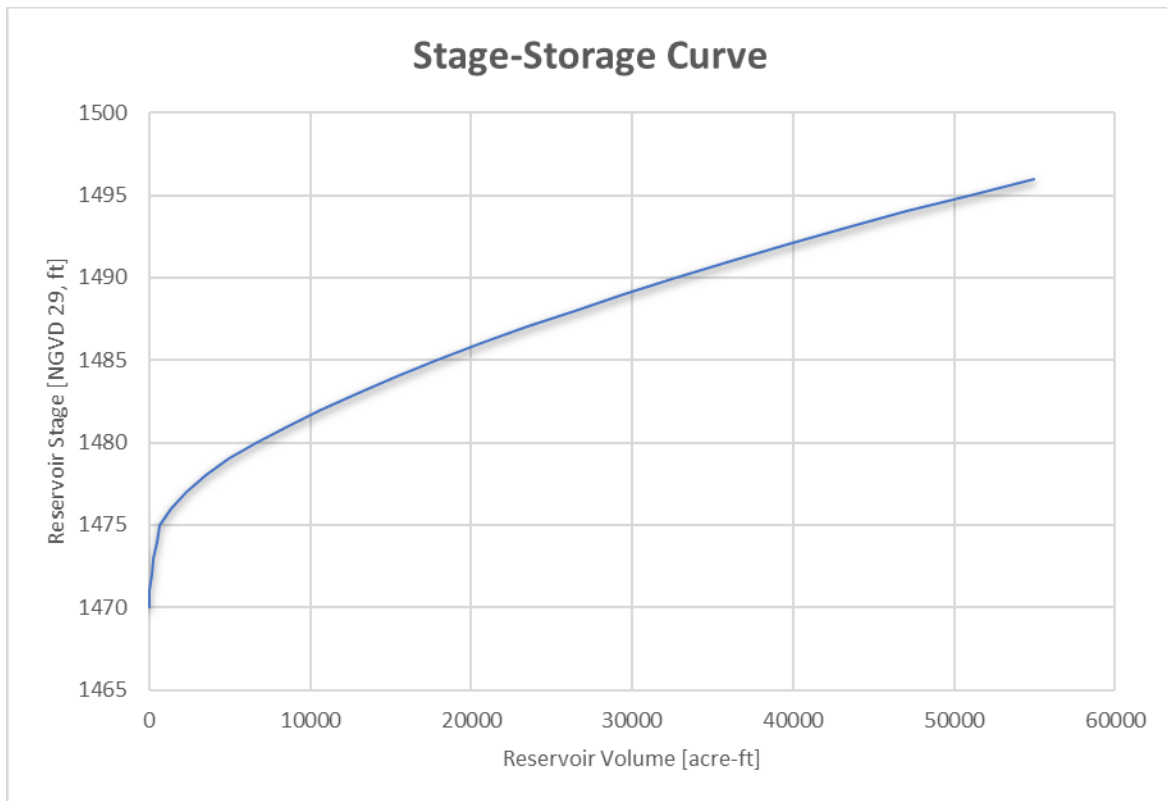
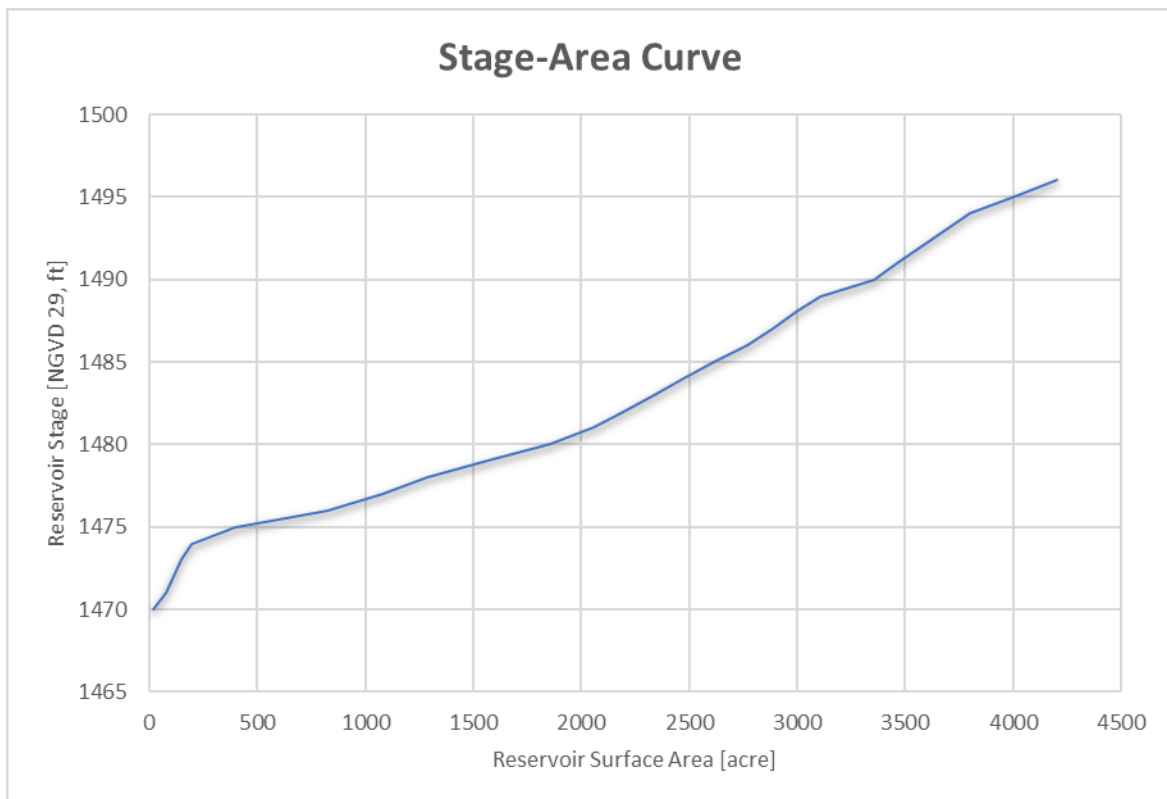


Figure A-3 Stage-Area Curve for the Gile Flowage Storage Reservoir



Two operators are assigned to oversee the daily operation and routine maintenance of the Project. An operator for the facility is available 24 hours per day, seven days per week. The Project is manually operated. NSPW is not proposing any changes to Project operations with the exception of the two proposed whitewater releases discussed below.

NSPW is proposing two water releases each year (one in June and one in September) from the Gile Dam for whitewater boating in the West Fork, and consequently, the downstream Saxon Falls Gorge. Each release would consist of a total discharge of 1,200 cfs for three hours beginning in the morning with a one-hour flow change ramp to begin and end. The radial gate will be adjusted as-needed to produce the appropriate discharge. The travel time for water released from the Gile Dam to reach Saxon Falls is approximately 10 to 12 hours; therefore, the West Fork and Saxon Falls Gorge could both be boated the same day.

10. Safe Management, Operation, and Maintenance

NSPW has a robust Owners Dam Safety Program that incorporates all inspection, monitoring, and reporting requirements for a dam with this hazard classification. It also ensures that adequate resources are allocated for the fulfillment of FERC dam safety requirements. The current Owners Dam Safety Program was revised and submitted to FERC on January 12, 2022.

NSPW developed a public safety plan (PSP) in 2022 and submitted it for FERC review and comment. The FERC determined that the PSP was satisfactory in their July 25, 2022 letter; however, it directed NSPW to evaluate the need for a boat restraining barrier, and if barrier is warranted, to submit a revised PSP to reflect the change. The PSP is reviewed on an annual basis to determine if any changes are necessary.

11. Average Annual Generation

A storage benefits report for the Gile Flowage was developed for NSPW in 2019 and e-Filed with the Commission on February 21, 2020.²⁴ The report concluded that the current operation of the Project provides a 21% increase in generation for the downstream Saxon Falls and Superior Falls hydroelectric projects. This calculates to 2,103.2 MWh for Saxon Falls and 2,401.6 MWh for Superior Falls for the five-year period ending in 2021.

12. River Flow Characteristics

As outlined in the Proposed Study Plan clarification letter dated July 14, 2021²⁵, NSPW utilized daily outflow and storage reservoir elevation data for the period 1994 to 2021 to calculate inflows to the Project and create flow duration curves. The drainage basin for the Project is 70 square miles. Based on streamflow data for the period of January 1994 to December 2021, the 10% exceedance flow at the Project was 305 cfs, the 50% exceedance flow was 58 cfs; and the 90% exceedance flow was 10 cfs.

Streamflow duration data shows the percentage of time a given flow is equaled or exceeded. Monthly flow duration curves and the annual exceedance table are based on data collected from January 1994 to December 2021 and are included in **Appendix A-3**.

²⁴ Accession No. 20200221-5033 (NSPW, 2020).

²⁵ Accession No. 20210715-5011 (NSPW, 2021b).

13. Estimated Project Cost

The net book value (net investment) of the existing facility was calculated at (\$180,918) and the gross book value was calculated at \$361,771 as of December 31, 2022. These figures include land and land rights, structures and improvements, waterway improvements, accessories, and miscellaneous equipment.

14. Estimated Costs of Proposed Environmental Measures

The additional estimated capital and estimated annual Operation and Management (O&M) costs for proposed environmental measures are outlined in **Table A-1**.

Table A-1 Estimated Capital and Annual O&M Costs for Proposed Environmental Measures²⁶ at the Gile Project

Item		Capital Cost	Annual O&M Cost
Maintain a minimum flow of 10 cfs into the West Fork for enhancement of downstream aquatic habitat.		\$0	\$0 ²⁷
Restrict the typical daily drawdown of the reservoir to approximately 0.1 feet per day, but no more than 0.2 feet per day, to balance the needs of generation with the needs of recreation and the aquatic environment.		\$0	\$0 ²⁸
Develop Aquatic and Terrestrial Species Plan and conduct biennial invasive species surveys.		\$40,000	\$35,000*
Complete shoreline erosion survey every 5 years.		\$0	\$15,000*
Develop Historic Resources Management Plan and revisit shoreline surveys every 5 years.		\$20,000	\$15,000*
Develop an Operations Monitoring Plan.		\$25,000	\$0
Comply with operations deviation reporting and consultation.		\$0	\$10,000
Provide flow release and storage reservoir elevation information via the internet.		\$50,000	\$1,000
Recreation Measures	Review and update or replace the Take-Out sign and Part 8 sign at the Canoe Portage site.	\$6,000	\$0
	Conduct routine maintenance of NSPW's FERC approved recreation site(s) (Canoe Portage Site and Trail), including signage, over the term of the license.	\$0	\$750
	Develop Whitewater Recreation Plan that also includes the Saxon Falls Hydroelectric Project.	\$15,000	\$0
	Provide 2 releases annually for downstream whitewater boating.	\$0	\$1,000 ²⁹

²⁶ All costs are estimated in 2023 dollars.

²⁷ No cost is included for the minimum flow releases because the proposed operating range is expected to provide adequate storage reserves such that the downstream generation will not be adversely impacted by the proposed environmental mitigation and enhancement measures.

²⁸ No cost is included for the typical daily drawdown of approximately 0.1 foot per day, but no more than 0.2 feet per day, restriction because the proposed operating range is expected to provide adequate storage reserves such that the downstream generation will not be adversely impacted by the proposed environmental mitigation and enhancement measures.

²⁹ The annual cost for whitewater flow releases is \$1,000 for the operators to be dispatched on a weekend to adjust the flows. The lost generation for it does not include any cost for lost generation due to lost storage because the proposed operating range is expected to provide adequate storage reserves such that the downstream generation will not be adversely impacted by the proposed environmental mitigation and enhancement measures.

Item		Capital Cost	Annual O&M Cost
	Supplement water releases as needed from the Gile Dam for enhanced aesthetics at the Saxon Falls bypass reach.	\$0	\$0 ³⁰
	Implement the Cave Bat BITP/A and Wood Turtle BITP/A for any routine vegetation maintenance activities at NSPW's FERC-approved recreation site.	\$0	\$2,000
Total Cost		\$156,000	\$NA³¹

*cost per survey event

15. Purpose of the Project

The purpose of the Project is to provide headwater storage for seasonally uniform hydroelectric generation at NSPW's downstream Saxon Falls (FERC Project No. 2610) and Superior Falls (FERC Project No. 2587) hydroelectric projects.

16. License Application Development Costs

The costs for NSPW to relicense under the Integrated Licensing Process through the filing of the Final License Application (FLA) is \$689,786.

17. Estimated Value of On-Peak Power and Off-Peak Power

Although the project operates as a storage reservoir, and has no generating facilities, it does provide downstream benefits to the Saxon Falls and Superior Falls hydroelectric projects. Based upon an average energy value of \$27.32 per MWh, the average annual gross revenue from 2017 to 2021 was \$273,618 for the Saxon Falls Project and \$312,442 for the Superior Falls Project with \$123,073 (21%) attributed to the operation of the Gile Project.³²

18. Average Annual Increase or Decrease in Project Generation and Value of Power Due to Changes in Project Operations

NSPW is not proposing any changes that will affect power generation at the two downstream hydroelectric projects. The proposed operating range is expected to provide adequate storage reserves such that the downstream generation will not be adversely impacted by the proposed environmental mitigation and enhancement measures.

19. Remaining Undepreciated Net Investment, or Book Value of the Project

The undepreciated net investment of the Project as of December 31, 2022 was (\$180,918).³³

³⁰ No cost is included for the additional aesthetic flows that could result in lost generation downstream because the proposed operating range is expected to provide adequate storage reserves such that the downstream generation will not be adversely impacted by the proposed environmental mitigation and enhancement measures.

³¹ The total O&M Costs are not listed here because not all the costs are incurred annually.

³² Calculated from replacement power value and the average annual generation figure from the FLA for the Saxon Falls and Superior Falls Hydroelectric Project Exhibit A and H, Accession No. 20221230-5395.

³³ Undepreciated net investment was calculated by subtracting the accumulated depreciation from the book cost. Accumulated depreciation was determined by combining the Life Reserve depreciation and COR Reserve depreciation. Life Reserve depreciation

20. Annual Operation and Maintenance Costs

The average annual cost to operate and maintain the Gile Project for the period 2018-2022 is estimated to be \$282,967 per year. These costs are outlined in **Table A-2** and include general O&M expenses, insurance, taxes, and depreciation. A breakdown of the individual components of the general O&M expense category is shown in **Table A-3**.

Table A-2 Annual Operation and Management Costs

Item	Cost
General O&M Expenses (5-year average)	\$39,424
Insurance ³⁴	N/A
2022 Property Taxes	\$2,582
2022 Depreciation	\$240,961
Average Annual O&M Cost	\$282,967

Table A-3 Cost Breakdown of General O&M Expense Category³⁵ (2018 to 2022)

Cost	2018	2019	2020	2021	2022	2018-2022 Mean
Employee Expenses	\$517	\$675	\$574	\$2,744	\$0	\$1,128
Labor	\$22,798	\$17,862	\$18,966	\$26,097	\$16,513	\$20,447
Materials & Commodities	\$737	\$3,142	\$4,137	\$2,985	\$0	\$2,750
Miscellaneous	\$2,144	\$0	\$0	\$0	\$0	\$2,144
Outside Services	\$6,599	\$25,354	\$28,152	\$5,028	\$12,093	\$15,445
Total General O&M Costs	\$32,796	\$47,034	\$51,829	\$36,854	\$28,606	\$39,424

21. One-Line Diagram of Electric Circuits

The Project has no generating facilities or electric circuits associated with it, therefore, there is no one-line diagram.

22. Lands of the United States

There are no federally owned lands within the Project boundary.

23. Public Utilities Regulatory Policy Act

The Licensee is not seeking benefits under the Public Utility Regulatory Policies Act (PURPA) as it pertains to the Project.

is the recovery of book cost and the COR Reserve depreciation is a supplemental recovery/reduction based off the authorized salvage percentage and related dismantling study.

³⁴ NSPW pays a lump sum for insurance costs per operating company (i.e., NSPW, NSPM), therefore there are not insurance costs specific to the Gile Project.

³⁵ Includes administrative costs.

24. Supporting Design Report

The supporting design report is considered Critical Energy Infrastructure Information and was filed as such as a separate document on December 18, 2023 (FERC Accession No. 20231218-5122).

25. Works Cited

Ayres Associates. (2016). *2016 Consultant Safety Inspection Report for the Gile Reservoir Dam-WDNR Field File No 26.09*.

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NSPW. (2021a). *Proposed Study Plan Clarifications, FERC Accession No. 20210503-5256*. May 3, 2021.

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