

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Ramm Power Group LLC

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Project No. 14869

**REPLY COMMENTS  
OF RAMM POWER GROUP LLC**

Pursuant to 18 C.F.R § 5.3 (2019), Ramm Power Group LLC replies to the February 14, 2020 comments of the Arizona Department of Environmental Quality (ADEQ), Elim Mining (USA) Inc., and Le Petomane XXV, Inc. (submitted in its capacity as Trustee of the ASARCO Multi-State Environmental Custodial Trust). Ramm is the developer and holder of a Preliminary Permit on the proposed 160-megawatt closed-loop Sacaton Pump Hydro Storage Project (Project No. 14869) in Pinal County, Arizona. On January 15, 2020, Ramm filed its Notice of Intent (NOI) and Pre-Application Document (PAD), together with a Letter Requesting Use of Traditional Licensing Process (TLP).

ADEQ expresses its general support of “green energy projects such as the one proposed by RAMM,” but raises concerns about the “environmental conditions at the [Sacaton] property,” (ADEQ at 1),<sup>1</sup> Elim asks the Commission to “cancel” the July 19, 2018 Preliminary Permit the Commission issued for the Sacaton Project. Elim and Petomane ask the Commission to “decline to open a licensing proceeding.” (Elim at 1, 4; Petomane at 1) All three commenters ask that Ramm be required to use the integrated licensing process (ILP) rather than the traditional licensing process (TLP). (ADEQ at 3; Petomane at 8-10; Elim at 20-21)

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<sup>1</sup> Petomane similarly recognizes that “[p]umped storage is generally an excellent, environmentally friendly renewable electric generation technology.” (Petomane at 2)

ADEQ's concerns over how Ramm will treat the acidic on-site water are important and are addressed in the PAD and will be addressed in Ramm's license application. Elim's argument for cancelling Ramm's preliminary permit fundamentally misunderstands the preliminary permit process and should be rejected. Elim's and Petomane's remaining arguments are unsupported speculation on economic and environmental issues that are premature and will be addressed fully in due course when Ramm applies for a license.

The Commission ultimately will direct whether Ramm's application will be processed using the TLP or ILP. Because of the extensive documentation on the Sacaton site that is already publicly available, including the exhaustive March 11, 2019 Tetra Tech Site Implementation Plan (SIP) for the Sacaton site, Ramm submits TLP would be more timely and efficient in this case; nevertheless, Ramm is prepared to prosecute its application using either process as the Commission determines appropriate.

**I. RAMM'S PRELIMINARY PERMIT IS VALID AND SHOULD NOT BE CANCELLED**

Elim's argument that the Commission should "cancel" the Preliminary Permit issued to Ramm fundamentally misunderstands and conflicts with the very purpose of a preliminary permit as explained in longstanding Federal Power Act precedent.

The Sacaton Project (as detailed in the Ramm's application for the Preliminary Permit, the PAD and the Letter Requesting TLP) will store clean renewable energy, available around-the-clock, generated from an adjacent solar power facility for delivery to buyers that have executed power purchase agreements, including data centers, and that have committed to rely only on clean renewable energy—known as

renewable 100% or RE100 companies. In doing so, Ramm, of necessity, will treat mine water from the Sacaton site to the very high degree of purity as required to flow through the penstocks and high-efficiency turbines of its closed-loop pump-storage Sacaton Project. *See* PAD at 11 (referencing 18 C.F.R. §5.6(d)(3)(iii)). Moreover, as explained in the PAD and accompanying documents, Ramm will line the reservoirs of the Sacaton Project so that no water used in connection with the Project will migrate into any aquifer or other groundwater repository, consistent with Ramm's Aquifer Protection Plan. *See* Letter at 15.

Ramm applied for a preliminary permit on March 1, 2018. None of the commenters nor anyone else opposed Ramm's application.<sup>2</sup> By order of July 19, 2018, the Commission granted the permit. 164 FERC ¶62,037 (2018). As the Commission has explained, its "issu[ance of] a preliminary permit . . . grants the permittee the priority to file a license application for a site (i.e., guaranteed right of first-to-file status) *while the permittee secures data on the site and prepares a license application.*" *See generally* Guidance for Applicant Seeking Licenses or Preliminary Permits for Closed-Loop Pump Storage Projects at Abandoned Mine Sites 4.2 (2019)(emphasis added).

Since issuance of its Preliminary Permit, Ramm diligently has done precisely what that Permit authorized. Consistent with 18 C.F.R. § 5.6(b)(1) (2019), Ramm has secured "existing, relevant, and reasonably available information" on the Sacaton site,

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<sup>2</sup> In *Green Energy Storage Corp.*, 150 FERC ¶61,042 (2015), the Commission explained that a "preliminary permit proceeding is contested if the intervention *opposes the grant of the permit itself*, as opposed to the construction of the project, which is outside the scope of the preliminary permit." *Id.* at P10 (citing *Robert A. Davis III and Michael P. O'Brien*, 53 FERC ¶61,040 (1990)).

including the comprehensive SIP that consulting engineer Tetra Tech performed under contract with the Trust, all of which Ramm incorporated into its PAD. That data review convinced Ramm of the environmental and economic viability of its Sacaton Project, enabling Ramm to submit to the Trust an offer to purchase the Sacaton site and to file its PAD, NOI and Letter Requesting TLP treatment.

In short, Ramm has diligently and in good faith pursued the Sacaton Project in complete compliance with the Commission's Preliminary Permit procedures.<sup>3</sup> In further compliance with the Commission's regulations, Ramm filed its PAD and NOI and Letter Requesting TLP. Accordingly, there is no basis for cancelling the Preliminary Permit.

## **II. COMMENTERS' CRITICISMS OF RAMM'S SACATON PROJECT ARE PREMATURE, SPECULATIVE, AND MOSTLY LACKING IN FOUNDATION**

Hydro licensing under Part I of the Federal Power Act is a sequential process. It begins when an application for preliminary permit is filed. Following the granting of a preliminary permit, it proceeds to the submission of a PAD and NOI; and it culminates (if at all) in the filing of a complete and fully supported license application. Depending on how the application is processed—TLP, Integrated (ILP) or Alternative (ALP)—the Commission and its expert staff begins its own evaluation, including studies required by the National Environmental Policy Act, the results from which will inform the conditions imposed on any license that is issued.

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<sup>3</sup> Consistent with the requirements of its Preliminary Permit, Ramm has submitted to the Commission semi-annual Progress Reports in Docket No. P-14869, informing the Commission and the public of progress made and progress planned six-months into the future.

Ramm's Sacaton Project has progressed beyond the Preliminary Permit, through the PAD and NOI stage. As noted earlier, the Commission's regulations require that the applicant compile in the PAD "existing, relevant, and reasonably available information," but do not require the applicant at this stage to perform new studies and analyses. Ramm has been aided substantially by publicly available monitoring documents on the Sacaton site dating from the 1970s and even more so by the exhaustive Site Implementation Plan (SIP) that Trust contractor Tetra Tech completed less than one year ago on the Sacaton site, which is included in its entirety in Ramm's PAD. Following the filing of its PAD and NOI, Ramm has received stakeholder input and diligently has been performing new studies and analyses to support its license application. Those studies, in turn, will inform Ramm's ultimate license application and address all of the issues commenters have raised.

***A. The Department of Environmental Quality's Concerns Are Premature and Will Be Addressed in Ramm's License Application***

ADEQ raises three specific concerns. Ramm intends to address each fully in collaboration with the Department. First, ADEQ asserts that Ramm's "PAD/NOI did not recognize many of the ongoing environmental conditions as they currently exist and [Ramm] did not include an in-depth engineering and hydrogeological analysis." ADEQ at 1. Actually, historical monitoring data and the Tetra Tech SIP provide an exhaustive, up-to-date report on the current environmental conditions at the Sacaton site;<sup>4</sup> Ramm has analyzed that data and the SIP in detail; and Ramm is currently

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<sup>4</sup> The Sacaton site has been under the administration of the trust since 2009, and extensive remediation of the site has been completed as ADEQ explains in its comments. ADEQ at 1. The status of the site is in no way comparable to the Anaconda site at issue in *Green Energy Storage Corp.*, 150

preparing its own in-depth engineering and hydrogeological analyses that will be submitted to the Commission as part of its license application. Ramm has no intention of investing many tens of millions of dollars in its Sacaton Project without the benefit of these analyses and is confident the Department will find them to be thorough and in-depth. ADEQ can then opine on their adequacy but doing so now is premature.

Second, ADEQ contends that Ramm “does not outline how [it] will handle, specifically treat, or otherwise direct the disposition or use of low pH acidic water in the [mine] pit that will be generated by this project.” ADEQ at 2. Ramm is not entirely sure at what this concern is directed since the Sacaton Project will not *generate* acidic water. That water already exists in the mine pit. Water at the mine site is not only acidic, but also polluted in other ways of which Ramm is thoroughly aware and will continue to study. With respect to the disposition of mine pit water, two points warrant emphasis. First, Ramm will charge and replenish its upper reservoir using purified water currently available in abundance from other sources—for example, the Casa Grande wastewater treatment plant—and will not draw water from any groundwater aquifer. Second, all reservoirs associated with the pump-storage operation will be lined with impermeable material through which acidic or otherwise polluted water will not be able to migrate into aquifers and other groundwater deposits.

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FERC ¶61,042 (2015), *cited in* Elim at 4 n.13, 12 n.26, for which the Commission rescinded a preliminary permit. The Commission did so “based on the fact that the proposed project area is a Superfund site,” designated under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). At the time of the permit rescission the *Green Energy* site was in the earliest stage of being evaluated for remediation under CERCLA—the Remedial Investigation phase—and, according to the Environmental Protection Agency would “take decades to clean up.” *Id.* at P 8. Sacaton is not a Superfund site and its remediation, according to ADEQ, is now complete.

Third, the Department wants Ramm to “specif[y] how such a large amount of water required for [its] project will be obtained and how movement of such a large amount of water can be maintained without an available water resource or negative environmental impact.” (ADEQ at 2) As noted above, purified water to charge and replenish the Sacaton Project reservoirs is currently available for the Casa Grande waste treatment plant and other sources. Moreover, the Department’s question appears to overlook an essential attribute of Ramm’s Sacaton Project: The Project is closed-loop. It continuously recycles the same water, requiring only initial fill and periodic recharges to counteract evaporation. Ramm explains this characteristic of the Sacaton Project in Ramm’s Letter Requesting TLP. Letter at 15-16.

***B. The Trust’s Criticism Are Not Well Founded and False***

Ironically, the Trust faults Ramm for failing to consult and coordinate with it. (Petomane at 4-5) To the contrary, in its haste to sell the Sacaton site and remove it from its books, it is the Trust that has refused to consult or coordinate with Ramm, not vice versa. The Trust admits this in its comments. (Petomane at 4 (Once Ramm submitted its purchase offer, the “Trust declined entering into further discussions on the Ramm purchase offer.”)) And, following the Commission’s issuance of the Preliminary Permit, the Trust denied Ramm access to the Sacaton site. Petomane at 5 (“Ramm will not be allowed to access the Sacaton Site.”)

Petomane advances other bogus arguments. It faults Ramm’s reliance on and inclusion of the Tetra Tech SIP in its PAD because, according to the Petomane, the SIP was created . . . for entirely different purposes.” Petomane at 1, 5. But that’s not true. The purposes of the SIP are not in dispute. As Tetra Tech clearly explains in

paragraph 1.2 of the SIP: “The primary objectives of the SIP” Tetra Tech instructs, “are to: 1) Mitigate Potential Human/Ecological Health Hazards; 2) Mitigate Offsite Transport of Tailings/Waste Rock Sediments and Wind-Blown Dust; and 3) Stabilize TSF [Tailing Storage Facility], WRD [Waste Rock Dump], and UMWA [Underground Mine Workings Area].” To accomplish these objectives, Tetra Tech and its sub-contractors conducted and reported in the SIP exhaustive hydrological and geological investigations of the Sacaton site. Those investigations as reported in the SIP are *site-specific*, not project specific. They equally inform all potential uses of site, including Ramm’s closed-loop pump-storage Sacaton Project.

Petomane asserts without support that the Sacaton Project might undo remediation that the Trust has to-date undertaken. Petomane at 5-6. Facts are to the contrary. Most of the tax-payer financed remediation has funded publicly available groundwater studies, including those that Tetra Tech reported in the SIP, on which Ramm has relied in the preparation of its studies in support of the Sacaton Project.

Petomane also advances untruths. It represents Ramm’s designated responsible party Mr. Rousselle as saying Ramm “would never move forward with the project as proposed. (Petomane at 5) Ramm has reviewed Mr. Rousselle’s communications with the Trust and he did not say that. What Mr. Rousselle told the Trust is that Ramm would not move forward with any project that harmed the environment or reversed any of the Trust’s remediation efforts. That Petomane misrepresented Mr. Rousselle’s communications with the Trust show that it is the one that “lacks candor,” not Ramm. (*Contra* Trust at 7).



***C. Mining Company Elim Would Revive Activities that Caused Sacaton to Become a Polluted Site Requiring Costly Remediation—Hardly a “More Beneficial Use”***

Commenter Elim contends that Ramm’s Sacaton Project is incompatible with its proposal to revive copper mining at the Sacaton site. Elim contends that in a head-to-head competition for the site, it will be the “more beneficial use” and a “better steward.” (Elim at 3, 16) No evidence is provided in support of these self-serving pronouncements. More to the point, Elim fails to explain how resumption of the very copper mining activity that polluted the Sacaton site in the first place and precipitated its costly remediation is somehow a more beneficial use than the clean renewable energy storage facility for which Ramm has obtained its Preliminary Permit. Beyond that unanswered question, Elim advances its legally and factually wrong “claim jumping” argument and makes untenable comparisons of the Sacaton site (*see* eleven site photographs, SIP at 197-208) to “the aesthetic value” of a scenic waterfall (Elim at 19) and the “important biological, sociological and economic benefits of [a] wild trout” stream. (*Id.* at 20)

The “claim jumping” that the court suggested might be objectionable in *Cooley v. FERC*, 843 F.2d 1464 (D.C. Cir. 1988) and the Commission found objectionable in *Inghams Corp*, 52 FERC ¶61,107 (1990) bears no resemblance to the facts now before the Commission. What was deemed objectionable “claim jumping” in *Inghams* was a request for a permissive hydro license under Federal Power Act § 4(e) that would have displaced an existing—that is currently operating—hydro operator of a facility that never required nor possessed a Federal Power Act license. *Inghams*, 52 FERC at p. 4 (“we conclude that no regulatory purpose would be served by entertaining a third

party's preliminary permit application for a [§]4(e) project where the application proposes *no* post-1935 construction." (emphasis added)); *cf.*, Cooley, 843 F.2d at ¶¶ 3, 20, 22, 27 (FERC has authority to issue to a third-party "volunteer" a § 4(e) license to invest in and restart a pre-1920 "idle electric power plant" over objection of the owner of adjacent riparian land). Here, in the case of Ramm, there is no existing hydro facility (operating or idle). Rather Ramm proposes new construction of a clean energy storage facility with no displacement of any existing legally operating, jurisdictional or non-jurisdictional hydro facility. To be completely clear, here there is only competition between a preliminarily permitted clean-energy pump-storage hydro project and a mining operation proposed for resuscitation.

Equally fatal to Elim's "claim jumping" contention is this overarching fact: Ramm's Preliminary Permit *precedes* Elim's claim to the Sacaton site. Elim elected to enter a still-executory purchase agreement with the Trust a full year after the Commission issued the Ramm Preliminary Permit. Elim made its purchase offer in full knowledge of Ramm's already issued Preliminary Permit and Ramm's ongoing development efforts. Elim knowingly undertook the risk that Ramm would continue to prosecute its superior right to the Sacaton site. That knowing assumption of risk is the opposite of Elim's "claim jumping" contention and provides no basis for upending the Commission's longstanding sequential licensing procedures implementing Part I of the Federal Power Act.

**III. TRADITIONAL LICENSING PROCESS WOULD PROVIDE SPEEDIER AND LESS COSTLY RESOLUTION OF OUTSTANDING SITE PURCHASE ISSUES**

Accompanying Ramm's PAD and NOI is its January 15, 2020 Letter Requesting Use of the Traditional Licensing Process. Ramm explained in the Letter that "TLP would be the most expeditious process" for its Sacaton Project because the TLP notice-and-comment process would better accommodate a negotiated settlement of the outstanding site acquisition issue than the strict schedules imposed by ILP. Letter at 1. Once the Commission rejects Elim's unfounded challenge to Ramm's Preliminary Permit and reaffirms the priority granted by the Permit, Ramm and the Trust can rapidly conclude their negotiation of the terms of purchase of the Sacaton site. As further explained in the Letter, Ramm estimates that expedited resolution made possible by TLP will save up to \$ 1 million per month by reducing the licensing time frame. Letter at 3 (citing 18 C.F.R. § 5.3(c)(1)(ii)(D)).

A wealth of currently available studies of the site inform Ramm's design of the Sacaton Project and eliminate any complex resources issues. *Id.* § 5.3(c)(1)(ii)(B). The site has been assessed, continuously monitored, and reported on since the early 1970s.<sup>5</sup> Ramm has used and made these historical reports foundational in the design of its pump-storage project. Added to this historical information is the recently completed Tetra Tech SIP, appended to Ramm's PAD, which details all available hydrological and geological data on the site. Little further analysis is required to

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<sup>5</sup> Based on this historical information, previous owner/operator of the site, Asarco, in 1987 proposed to repurpose the existing mine pit as a landfill. At that time, ADEQ stated that there were no obvious technical reasons to refuse the landfill permit that Asarco sought.

inform Ramm's Sacaton Project and make TLP the appropriate process for quickly and efficiently resolving the site acquisition issue.

In contrast, the rigid schedule of ILP is designed to generate and analyze information that, in the case of the Sacaton site, already exists and already informs the Sacaton Project. ILP is therefore unnecessary and will needlessly consume the Commission's and Ramm's time and resources. Nevertheless, if the Commission disagrees and believes Ramm should proceed using ILP, Ramm will do so.

#### **IV. CONCLUSION**

Ramm submits that its Preliminary Permit remains valid and that its continued efforts to perfect its license application for the clean energy storage Sacaton Project should not be derailed based on premature and largely unfounded comments on Ramm's PAD and NOI. Legitimate issues raised in those comments will be addressed and fully resolved in Ramm's license application.

While Ramm continues to believe that TLP offers a more timely and efficient licensing process than IRP, Ramm intends to proceed under either licensing process as the Commission deems appropriate.

Respectfully,

*/s/ Mike Werner*

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February 26, 2020

## Certificate of Service

I hereby certify that I have this 26<sup>th</sup> day of February 2020 served the foregoing documents upon each person designated below:

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For Ramm Power Group

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