



July 20, 2020

Via Electronic Filing

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

**Re: La Grange Hydroelectric Project, FERC Project No. 14581
Notification of Third Request for Water Quality Certification**

Dear Secretary Bose:

On July 15, 2020, Commission staff issued a letter requesting Turlock Irrigation District and Modesto Irrigation District (collectively, the “Districts”) to notify the Commission regarding the status of the Districts’ request for water quality certification to the California State Water Resources Control Board (“Board”) pursuant to Section 401 of the Clean Water Act, 33 U.S.C. § 1341, in support of the Districts’ October 11, 2017 application for an original license for the La Grange Hydroelectric Project No. 14581 (“La Grange Project”). The Commission’s letter explained that the policy set forth in *Swift River Company*, 41 FERC ¶ 61,146 (1987), would apply to the denial without prejudice letter issued by the Board on April 21, 2020,¹ and the Commission may dismiss a license application if an applicant does not inform the Commission within 90 days of the date of the Board’s denial letter of the status of water quality certification.

In response to Commission staff’s letter, the Districts are notifying the Commission that a third request for certification has been filed with the Board in support of the Districts’ October 11, 2017 license application for the La Grange Project (*see* Attachment A). The request has been filed within the 90-day period established by *Swift River Company*. The

¹ Commission staff’s July 15, 2020 letter refers to the Board’s April 20, 2020 denial-without-prejudice letter. The Districts’ clarify for the Commission that, while the letter is dated April 20, 2020, it was not electronically signed by the Board’s representative until after the Board’s close of business on April 20. The Board did not publicly publish or serve the letter until after the Commission’s close of business on April 21, 2020, when it sent a copy of the letter to the Districts and other parties via email. The Board did not file the letter with FERC until April 22, 2020.

Secretary Bose
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Districts reserve the right to petition the Commission for an order finding that the Board has waived its authority under Section 401 of the Clean Water Act to issue water quality certification.

Respectfully submitted,



Michael I. Cooke
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381
(209) 648-6819
micooke@tid.org



John B. Davids
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352
(209) 526-7564
john.davids@mid.org

Enclosure

cc: P-14581-002 Service List

Attachment A



July 20, 2020

DELIVERED VIA EMAIL; DATE STAMP REQUESTED

Eileen Sobeck, Executive Director
California State Water Resources Control Board
1001 "I" Street, 14th Floor
Sacramento, CA 95814

**Re: La Grange Hydroelectric Project, FERC Project No. 14581
Third Request for Water Quality Certification**

Dear Director Sobeck:

On January 26 2018, Turlock Irrigation District and Modesto Irrigation District (collectively, the "Districts") filed with the State Water Resources Control Board ("SWRCB") an original request for water quality certification pursuant to Section 401 of the Clean Water Act, 33 U.S.C. § 1341, in support of the Districts' October 11, 2017 application before the Federal Energy Regulatory Commission ("FERC") for an original license for the La Grange Hydroelectric Project No. 14581 ("La Grange Project") (*see* Attachment A). The request for water quality certification was filed in accordance with Title 23, Division 3, Chapter 28, Article 4, Sections 3855 and 3856 of the California Code of Regulations. The SWRCB acknowledged receipt of the Districts' request for water quality certification on February 15, 2018 (*see* Attachment A). On January 24, 2019, the SWRCB issued a letter notifying the Districts' that the request for water quality certification for the La Grange Project was denied without prejudice (*see* Attachment A).

On April 22, 2019, the Districts filed with the SWRCB a second request for water quality certification in support of the Districts' October 11, 2017 application for license (*see* Attachment B). On May 21, 2019, the SWRCB acknowledged receipt of the Districts' second request for certification (*see* Attachment B). In a letter dated April 20, 2020, the SWRCB issued a second letter notifying the Districts' that the request for water quality certification for the La Grange Project was denied without prejudice (*see* Attachment B).

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In order to ensure the Districts' October 11, 2017 license application remains in good standing before FERC, the Districts are filing with the SWRCB a third request for certification for the La Grange Project in support of the Districts' October 11, 2017 license application. If you have any questions regarding this request, please contact the undersigned. Please note that Mr. Cooke should be used as the contact for Turlock Irrigation District for all future correspondence.

Respectfully submitted,



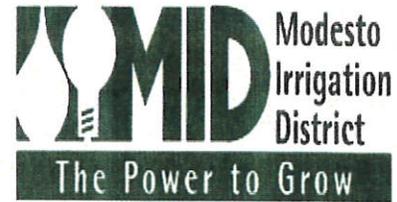
Michael I. Cooke
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381
(209) 648-6819
micooke@tid.org



John B. Davids
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352
(209) 526-7564
john.davids@mid.org

Enclosures
cc: Chase Hildeburn, SWRCB

Attachment A



January 26, 2018

HAND DELIVERED

Eileen Sobeck, Executive Director
California State Water Resources Control Board
1001 "I" Street, 14th Floor
Sacramento, CA 95814

JAN 26 2018

**Subject: La Grange Hydroelectric Project, FERC Project No. 14581
Application for Water Quality Certificate**

Dear Ms. Sobeck:

Pursuant to Section (§) 5.23(b) of the Code of Federal Regulations, by this letter, Turlock Irrigation District and Modesto Irrigation District (collectively, the Districts) file with the State Water Resources Control Board (Board) an application for Water Quality Certification under Section 401 of the Clean Water Act in support of the Districts' application before the Federal Energy Regulatory Commission (FERC) for an original license for the La Grange Hydroelectric Project (Project; FERC Project No. 14581). This application for a Water Quality Certification is also being made pursuant to Title 23, Division 3, Chapter 28, Article 4, Sections 3855 and 3856 of the California Code of Regulations.

Physical addresses, mailing addresses, and telephone numbers for Turlock Irrigation District and Modesto Irrigation District are as follows:

Physical Address:
Turlock Irrigation District
333 East Canal Drive
Turlock, CA 95380
(209) 883-8222

Physical Address:
Modesto Irrigation District
1231 11th Street
Modesto, CA 95354
(209) 526-7337

Mailing Address:
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381

Mailing Address:
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352

The names and mailing addresses of individuals authorized to act as the Districts' agents for this application for a Water Quality Certificate are as follows:

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Page 2
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Turlock Irrigation District:
Steve Boyd
Director of Water Resources and
Regulatory Affairs
(209) 883-8364
seboyd@tid.org

Modesto Irrigation District:
Anna Brathwaite
Staff Attorney, FERC Project
Manager
(209) 526-7384
anna.brathwaite@mid.org

The Project is located in Stanislaus and Tuolumne counties on the mainstem of the Tuolumne River. Project facilities include the La Grange Diversion Dam, the La Grange headpond, and the La Grange powerhouse, along with associated facilities necessary to operate the Project as described in the license application.

On October 11, 2017, the Districts filed with FERC an Application for License for a Major Water Power Project, 5 Megawatt or Less – Existing Dam for the La Grange Hydroelectric Project. An electronic copy of the Final License Application (FLA), and additional information filings made on November 27 and December 13, 2017, are provided with this application for water quality certification. A record of consultation with state and federal agencies and other interested parties is included with the FLA filing.

The Districts believe this license application contains all the information required under Section 3856 of Title 23 of the California Code of Regulations in regards to contents of a complete application for a Water Quality Certificate. Should the Districts file with FERC amendments to this license application, the Districts will promptly provide to the Board a copy of each amendment, as required under Section 3834 of the California Code of Regulations.

The Districts intend to be the Lead Agencies for the purpose of complying with the requirements of the California Environmental Quality Act, and will coordinate with the Board and other responsible agencies.

If you have any questions regarding this request for a Clean Water Act Section 401 Water Quality Certificate, please contact the undersigned at the addresses and telephone numbers listed below.

Sincerely,



Steve Boyd
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381
(209) 883-8364
seboyd@tid.org



Anna Brathwaite
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352
(209) 526-7384
anna.brathwaite@mid.org

SWRCB
Page 3
January 26, 2018

Enclosure: DVD containing complete set of FLA documents and additional information filed with
FERC through January 26, 2108



ORIGINAL



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

FEB 15 2018

Steve Boyd
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381

Anna Brathwaite
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352

FILED
SECRETARY OF THE
COMMISSION
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FEDERAL ENERGY
REGULATORY COMMISSION

Dear Mr. Boyd & Ms. Brathwaite:

REQUEST FOR WATER QUALITY CERTIFICATION FOR THE RELICENSING AND LICENSING OF THE DON PEDRO AND LA GRANGE HYDROELECTRIC PROJECTS, FEDERAL ENERGY REGULATORY COMMISSION PROJECT NOS. 2299 & 14581, TUOLUMNE COUNTY, CALIFORNIA

Thank you for your letters requesting water quality certification (certification) pursuant to section 401(a)(1) of the Federal Clean Water Act (33 U.S.C. § 1341 et seq.) for relicensing and licensing of the Don Pedro and La Grange Hydroelectric Projects (collectively, Projects), Federal Energy Regulatory Commission (FERC) Project Nos. 2299 & 14581. The letters, received January 26, 2018, serve as a formal request for certification of the Projects. Certification is required prior to issuance of a new FERC license for the Projects. The Districts' letters initiate a one-year deadline from the date they were received for the State Water Resources Control Board (State Water Board) to act on the requests for certification. The certification is subject to completion of the environmental review process described below. The Districts will be subject to annual fees as specified in California Code of Regulations, title 23 (Cal. Code Regs. tit. 23), section 3833(b)(1). The new deadline for certification action is January 26, 2019.

Clean Water Act Section 401 Certification

Section 401 of the Federal Clean Water Act (CWA) requires any applicant for a federal license or permit, which may result in any discharge to navigable waters, to obtain certification from the State that the discharge will comply with the applicable water quality parameters in the CWA. Under section 303 of the CWA and under the Porter-Cologne Water Quality Control Act, the Central Valley Regional Water Quality Control Board adopted, and the State Water Board and United States Environmental Protection Agency approved, the *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan)*. The Basin Plan designates the beneficial uses of waters to be protected along with the water quality objectives necessary to protect those uses for the Tuolumne River and its tributaries. If the Projects do not comply with one or more of the water quality objectives or criteria, the Districts must describe the actions that it will take to bring its Projects into compliance with the applicable water quality limits in order to fully protect and maintain the beneficial uses.

The applications for certification, together with the FERC license applications and other documents from the FERC files that are incorporated by reference in the certification applications, meet the application filing requirements specified in Cal. Code Regs., tit. 23, section 3856. The State Water Board may request additional information to clarify, amplify,

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Mr. Boyd & Ms. Brathwaite

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FEB 15 2018

correct, or otherwise supplement the contents of the applications. Supplemental information may include evidence of compliance with the water quality control plan. (Cal. Code Regs. tit. 23, § 3836.)

A certification is issued when the State Water Board determines that an application for certification is complete and there is reasonable assurance the operation of the Project will comply with water quality standards and other appropriate requirements. The State Water Board must analyze potential Project-related environmental effects to the Tuolumne River prior to making a determination that continued operation of the Projects will be protective of the designated beneficial uses of the watershed.

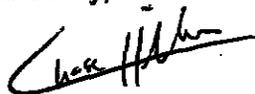
California Environmental Quality Act

Issuance of a certification is a discretionary action that requires the State Water Board to comply with the California Environmental Quality Act (CEQA). In this case, the Districts are the lead agency for the purpose of compliance with the requirements of CEQA.

State Water Board staff appreciates the continued cooperation of the Districts and looks forward to working with you on these Projects. Should you have questions regarding this matter, please contact me at (916) 323-0358 or by email at chase.hildeburn@waterboards.ca.gov. Written correspondence should be addressed as follows:

State Water Resources Control Board
Division of Water Rights
Attn: Chase Hildeburn
P.O. Box 2000
Sacramento, CA 95814

Sincerely,



Chase Hildeburn, WRCE
Water Quality Certification Program
Division of Water Rights

cc: Mr. Tomás Torres, Director
U.S. Environmental Protection Agency
Region 9, Water Division
75 Hawthorne Street
San Francisco, CA 94105

Ms. Kimberly D. Bose, Secretary
Federal Regulatory Energy Commission
888 First Street, NE
Washington, D.C. 20426

Ms. Pamela Creedon, Executive Officer
Central Valley RWQCB
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670



ORIGINAL



GAVIN NEWSOM
GOVERNOR

JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

FILED
SECRETARY OF THE
COMMISSION

State Water Resources Control Board

2019 FEB -6 A 8 13

JAN 24 2019

FEDERAL ENERGY
REGULATORY COMMISSION

Mr. Steve Boyd
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381

Mr. John B. Davids
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352

Dear Mr. Boyd and Mr. Davids:

DENIAL WITHOUT PREJUDICE OF WATER QUALITY CERTIFICATION FOR DON PEDRO HYDROELECTRIC PROJECT AND LA GRANGE HYDROELECTRIC PROJECT, FEDERAL ENERGY REGULATORY COMMISSION PROJECTS NOS. 2299 AND 14581, TUOLUMNE COUNTY

On January 26, 2018, the State Water Resources Control Board (State Water Board) received a request from Turlock Irrigation District (TID) and Modesto Irrigation District (MID) (collectively, Districts) for water quality certification (certification) pursuant to section 401(a)(1) of the Federal Clean Water Act (33 USC § 1341 et seq.) for the relicensing of the Don Pedro Hydroelectric Project and licensing of the La Grange Hydroelectric Project (collectively, Projects), Federal Energy Regulatory Commission (FERC) Projects No. 2299 and 14581. Waterbodies associated with the Projects include the Tuolumne River and its tributaries.

In taking certification action, the State Water Board must either: (1) issue an appropriately conditioned water quality certification; or (2) deny certification. (Cal. Code Regs., tit. 23, § 3859.) A water quality certification may be issued if it is determined that there is reasonable assurance that an activity will comply with state and federal water quality standards and that the appropriate environmental documents have been adopted to support certification and meet the requirements of the California Environmental Quality Act (CEQA). However, when a proposed project's compliance with water quality standards is not yet determined, but the application suffers from a procedural inadequacy, the State Water Board may deny certification without prejudice. (Cal. Code Regs., tit. 23, § 3837, subd. (b)(2).)

At this time, FERC has not yet completed its National Environmental Policy Act (NEPA) environmental analysis for the Projects. Additionally, the Districts, as lead agencies for the Projects, have not begun the CEQA process. Without completion of the CEQA process, the State Water Board cannot issue a certification.

The Districts are hereby notified that the January 26, 2018 request for certification for the Projects is denied without prejudice, effective the date of this letter. The denial without prejudice carries with it no judgment on the technical merits of the activity. In order to maintain an active certification application, the Districts will need to request certification for the Projects.

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

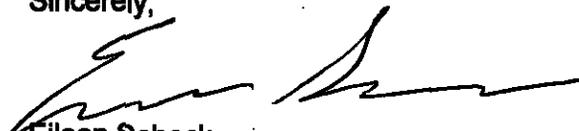
Mr. Boyd and Mr. Davids

- 2 -

JAN 24 2019

If you have questions regarding this letter, please contact Chase Hildeburn, Projects Manager in the Water Quality Certification Program of the Division of Water Rights, at (916) 323-0358 or at Chase.Hildeburn@waterboards.ca.gov. Written correspondence should be directed to: State Water Resources Control Board; Division of Water Rights – Water Quality Certification Program; Attn: Chase Hildeburn; P.O. Box 2000; Sacramento, CA 95812-2000.

Sincerely,



**Eileen Sobeck
Executive Director**

cc: **Mr. Tomás Torres, Director
U.S. Environmental Protection Agency
Region 9, Water Division
75 Hawthorne Street
San Francisco, CA 94105**

**Ms. Kimberly D. Bose, Secretary
Federal Regulatory Energy Commission
888 First Street, NE
Washington, D.C. 20426**

**Ms. Patrick Pulupa, Executive Officer
Central Valley RWQCB
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670**

Interested Parties Mailing List

Attachment B



April 22, 2019

DELIVERED VIA EMAIL; DATE STAMP REQUESTED

Eileen Sobeck, Executive Director
California State Water Resources Control Board
1001 "I" Street, 14th Floor
Sacramento, CA 95814

**Re: La Grange Hydroelectric Project, FERC Project No. 14581
New Request for Water Quality Certification**

Dear Director Sobeck:

On January 26 2018, Turlock Irrigation District and Modesto Irrigation District (collectively, the "Districts") filed their original request for water quality certification pursuant to Section 401 of the Clean Water Act, 33 U.S.C. § 1341, in support of the Districts' application before the Federal Energy Regulatory Commission ("FERC") for an original license for the La Grange Hydroelectric Project No. 14581 ("La Grange Project") (copy attached). The request for water quality certification was filed in accordance with Title 23, Division 3, Chapter 28, Article 4, Sections 3855 and 3856 of the California Code of Regulations. The State Water Resources Control Board ("SWRCB") acknowledged receipt of the Districts' request for water quality certification on February 15, 2018 (copy attached).

On January 24, 2019, the SWRCB issued a letter notifying the Districts' that their request for water quality certification for the La Grange Project was denied without prejudice (copy attached). The letter stated that in order to maintain an active certification application with the SWRCB, the Districts would need to request certification again. In response, the Districts' hereby file their new request for water quality certification for the La Grange Project.

If you have any questions regarding this request, please contact the undersigned. Please note that Mr. Davids should be used as the contact for Modesto Irrigation District for all future correspondence.

SWRCB
Page 2
April 22, 2019

Respectfully submitted,



Steve Boyd
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381
(209) 883-8364
seboyd@tid.org



John B. Davids
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352
(209) 526-7564
john.davids@mid.org

Enclosures
cc: Chase Hildeburn, SWRCB



State Water Resources Control Board

May 21, 2019

Steve Boyd
Turlock Irrigation District
P.O. Box 949
Turlock, CA 95381

Mr. John B. Davids
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352

Dear Mr. Boyd & Mr. Davids:

REQUEST FOR WATER QUALITY CERTIFICATION FOR THE LICENSING OF THE LA GRANGE HYDROELECTRIC PROJECT, FEDERAL ENERGY REGULATORY COMMISSION PROJECT NO. 14581, TUOLUMNE AND STANISLAUS COUNTIES

Thank you for your letter requesting water quality certification (certification) pursuant to section 401 of the Federal Clean Water Act (CWA) (33 U.S.C. § 1341) for licensing of the La Grange Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) Project No. 14581. Turlock Irrigation District (TID) and Modesto Irrigation District (MID) (collectively, Districts) are co-licensees of the Project. The State Water Resources Control Board (State Water Board) received your new request for water quality certification on April 22, 2019. Certification is required prior to issuance of a FERC license for the Project. The Districts' new request initiates a one-year deadline from the date it was received for the State Water Board to grant or deny the request for certification. Thus, the new deadline for certification action is April 22, 2020.

The certification is subject to completion of the environmental review process described below. In addition, the Districts are subject to annual fees as specified in California Code of Regulations, title 23, section 3833.1.

Clean Water Act Section 401 Certification

Section 401 of the CWA requires any applicant for a federal license or permit for an activity that may result in any discharge to navigable waters, to obtain certification from the State that the discharge will comply with the applicable water quality requirements, including the requirements of section 303 of the Clean Water Act for water quality standards and implementation plans, "or any other appropriate requirement of State law." (Clean Water Act § 401(d), 33 U.S.C. § 1341(d).) Conditions of certification shall become a condition of any federal license or permit subject to certification.

The application for certification, together with the FERC license application and other documents from the FERC files that are incorporated by reference in the certification application, meet the application filing requirements specified in California Code of Regulations, title 23, section 3856. The State Water Board may request additional information to clarify, amplify, correct, or otherwise supplement the contents of the applications.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Mr. Boyd & Mr. Davids

- 2 -

May 21, 2019

A certification is issued when the State Water Board determines that an application for certification is complete and there is reasonable assurance the operation of the Project will comply with water quality standards and other appropriate requirements of state law. The State Water Board must analyze potential Project-related environmental effects to the Tuolumne River prior to making a determination that continued operation of the Project will be protective of the designated beneficial uses of the watershed.

California Environmental Quality Act

Issuance of a certification is a discretionary action that requires the State Water Board to comply with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The Districts are the lead agencies for the purpose of CEQA compliance and they have not begun the CEQA process for the Project. As a responsible agency, the State Water Board relies on the environmental document prepared by the lead agency, but makes its own determination as to whether and with what conditions to grant the certification, taking into consideration the information provided in the lead agency's document. (Pub. Resources Code, §§ 21080.1, subd. (a), 21002.1, subd. (d).) Under state law, the State Water Board cannot issue a certification for the Project until the Districts comply with CEQA and the State Water Board's own CEQA process is complete. If a certification application is complete, but CEQA requires review of a final environmental document before issuing an approval and the necessary document is not available before the federal period for certification will expire, the State Water Board will deny the certification without prejudice. (Cal. Code Regs. tit. 23, §§ 3836, subd. (c); 3837, subd. (b)(2).)

Water Quality Control Plans

Under section 303 of the CWA and under the Porter-Cologne Water Quality Control Act (Wat. Code, § 13000 et seq.), the Central Valley Regional Water Quality Control Board adopted, and the State Water Board and United States Environmental Protection Agency approved, the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan). The Basin Plan designates the beneficial uses of waters to be protected along with the water quality objectives necessary to protect those uses for the Tuolumne River and its tributaries.

On December 12, 2018, the State Water Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan) for the Lower San Joaquin River and Southern Delta. On February 25, 2019, the Office of Administrative Law approved these amendments to the Bay-Delta Plan. The Bay-Delta Plan establishes narrative and numeric Lower San Joaquin River flow objectives for the protection of fish and wildlife beneficial uses. Of note, the numeric flow objectives require a percentage of unimpaired flow from February through June from each of the Stanislaus, Tuolumne, and Merced Rivers to protect fish and wildlife beneficial uses.

The Basin Plan and Bay-Delta Plan are water quality control plans that establish water quality standards and other appropriate requirements of state law that must be considered by the State Water Board in determining whether to grant certification. The State Water Board may request supplemental information that includes evidence of compliance with appropriate requirements of a water quality control plan. (Cal. Code Regs. tit. 23, § 3836, subd. (a).)

State Water Board staff appreciates the continued cooperation of the Districts and looks forward to working together on this Project. Should you have questions regarding this matter, please

Mr. Boyd & Mr. Davids

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May 21, 2019

contact me at (916) 323-0358 or by email at Chase.Hildeburn@waterboards.ca.gov. Written correspondence should be addressed as follows: State Water Resources Control Board, Division of Water Rights, Attn: Chase Hildeburn, P.O. Box 2000, Sacramento, CA 95812-2000.

Sincerely,

ORIGINAL SIGNED BY

Chase Hildeburn, WRCE
Water Quality Certification Unit
Division of Water Rights

cc: Mr. Tomás Torres, Director
U.S. Environmental Protection Agency
Region 9, Water Division
75 Hawthorne Street
San Francisco, CA 94105

Ms. Kimberly D. Bose, Secretary
Federal Regulatory Energy Commission
888 First Street, NE
Washington, D.C. 20426

Mr. Patrick Pulupa, Executive Officer
Regional Water Quality Control Board
Central Valley Region 5
Sacramento Office
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Kimbely Ognisty, Partner
Winston & Strawn LLP
1700 K Street, N.W.
Washington DC 20006-3817

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on the parties designated on the official service list compiled by the Secretary in P-14581-002.

Dated at Washington, D.C. this 20th day of July 2020.

/s/ Kimberly Ognisty
Kimberly Ognisty
1901 L Street N.W.
Washington, DC 20036
(202) 282-5217

Document Content(s)

Notification of Request for WQC La Grange (7-20-2020).PDF.....1