

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 2438-233 – New York
Waterloo and Seneca Falls Project
C-S Canal Hydro, LLC

September 2, 2026

VIA Electronic Mail

William H. Roeger
President, Seneca Lake Pure Waters Association
info@senecalake.org

Subject: Project Operations Complaint

Dear William H. Roeger:

On August 13, 2026,¹ you, on behalf of the Seneca Lake Pure Waters Association, Inc., filed a complaint under Rule 206 regarding project operations subsequent to the licensee discovering the leaking of the low-level gate #4 at the Seneca Falls Development of the Waterloo and Seneca Falls Hydroelectric Project No. 2438.² You are requesting the Commission to: (1) Reopen the Commission's Division of Dam Safety and Inspections - New York Regional Office review to order immediate emergency remediation; (2) Compel the licensee to deploy temporary cofferdams, localized bulkheads, or mechanical seals at low-level gate #4 immediately to halt the 164 cubic feet per second leak; and (3) Order the licensee to halt the artificial drawdowns of the Seneca Lake level until structural containment of the failure is achieved.

As is Commission practice with respect to allegations of non-compliance by hydropower licensees, the above complaint has been referred to the Commission's Office of Energy Projects, Division of Hydropower Administration and Compliance, which is charged with ensuring compliance. As such, we are treating the subject filing as a non-compliance allegation of the project license.

¹ See FERC Accession No. 20260813-5163.

² *Seneca Falls Power Corporation*, 78 FERC ¶ 62,113 (1997).

The provisions of Rule 206 will not apply to this proceeding.³ We will review the matter and request additional information from you or the licensee, if necessary, and provide a written response concerning our findings regarding the allegations.

If you have any questions regarding this letter, please contact Jeremy Jessup at (202) 502-6779 or Jeremy.Jessup@ferc.gov.

Sincerely,

Kelly Houff
Chief, Engineering Resources Branch
Division of Hydropower Administration
and Compliance

CC: VIA FERC Service

Kelly Maloney
VP Regulatory Compliance
230 Park Ave, Suite 447
New York, NY 10169

³ Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.206 (2025).