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December 30, 2021

Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Subject: Notice of Intent, Pre-Application Document and Request to Use TLP – Cat Creek Energy and Water Storage Renewable Power Station Project (FERC No. 14655)

Dear Secretary:

On behalf of Cat Creek Energy, I hereby notify FERC of the Applicant's intention to file an application for a subsequent license for the subject project. Project and Applicant information are as follows:

Applicant	Cat Creek Energy, LLC 398 S. 9th Street, Suite 240 Boise, ID 83702
FERC Project No.	P-14655
Principal project features:	Powerhouse/pumphouse, new reservoir, pipelines, transmission lines
Project location:	South Fork Boise River (Anderson Ranch Reservoir), Elmore County, ID, approximately 20 miles from Mountain Home, ID
Installed capacity	720 MW
Location where information is available	Cat Creek Energy, LLC 398 S. 9th Street, Suite 240 Boise, ID 83702
Local government	Elmore County 150 S 4th E St Mountain Home, ID 83647
Affected Indian Tribes	Shoshone Bannock Tribes P.O. Box 306 Fort Hall, ID 83203 Shoshone-Paiute Tribes of Duck Valley P.O. Box 219 Owyhee, NV 89832

Request to Use Traditional Licensing Process

Cat Creek Energy (CCE) has compiled a Pre-Application Document (PAD) in accordance with the requirements for licensing. This letter constitutes our formal request to utilize the Traditional Licensing Process (TLP) for licensing this project. In response to FERC regulations, we provide the following justification for use of the TLP:

1. Likelihood of Timely Issuance

CCE has been developing the proposed Project since 2011 and during that time has conducted extensive outreach and coordination with the public, NGOs, and local, state and federal government agencies, including FERC and the Bureau of Reclamation (Reclamation), who have agreed that this is a dual jurisdiction project (FERC license and Reclamation Lease of Power Privilege) for which the TLP is applicable.

2. Resource Issues

CCE has conducted extensive studies and data collection on resources in the Project area and has coordinated with state and federal resource agencies in the development of the PAD. Through these efforts, the Applicant and agencies have amassed substantial knowledge of the resource issues potentially presented by the Project. The PAD documents the existing conditions and potential Project impacts on water quality, water quantity and water rights, fish and wildlife (including Threatened and Endangered Species), recreation and other critical resources. Reclamation is concurrently conducting the Boise River Basin Feasibility Study and Environmental Impact Statement, which provides a complimentary examination of resources and resource issues. While the scope of the Project is substantial, because the base of understanding of resources and the Applicant's robust work plan to further study them during the licensing process, the Applicant anticipates the resource issues will be fully examined and resource impacts may, in most cases, be minor. Additionally the Applicant's has proposed extensive measures to avoid and minimize environmental impacts.

3. Level of Anticipated Controversy

Coordination conducted to date with local, state, and federal agencies and stakeholders indicated considerable interest in the project but did not suggest a high level of controversy.

4. Relative Cost of Traditional Licensing Process Compared to the Integrated Process

Based on examples and input from FERC, the Applicant estimates the cost of the TLP would be substantially less than that for the Integrated Licensing Process (ILP). The extensive meetings, documentation and filings required under the ILP would likely increase the cost substantially in comparison the TLP, without any added value or efficiencies. In addition the ILP would likely substantially increase the time required to develop and process the license application. The Applicant's discussions with FERC and Reclamation have indicated that the TLP is preferred by the agencies for the dual jurisdiction review.

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5. Amount of Available Information

As noted in 2 above, the Applicant has collected and reviewed a very large body of information to inform the licensing process. As also noted, Reclamation is concurrently conducting the Boise River Basin Feasibility Study and Environmental Impact Statement, which will generate a body of complimentary resource information on the same scale and with the same geographic setting as the proposed project.

6. Other Factors Believed by the Applicant to be Pertinent

The Project is designed to be a multifaceted, adaptable, and flexible facility offering a set of energy services to support the transition to decarbonization and a clean energy grid. The Project is designed to adapt to the changing grid conditions that will be encountered in the 100% clean energy grid pursuit over the next 30 years. Also, using National Renewable Energy Laboratory modeling the project is projected to provide thousands of construction jobs as well as long-term, project operations positions. As a nonfederal facility, over a billion dollars in taxes and fees would be generated over its lifespan to support various government potential investments into disadvantaged communities.

A copy of this request and the PAD have been sent to the agencies and tribes (a full distribution list is included with the PAD). A sample transmittal is attached

Please contact me at (208) 520-5135 if you have any questions.

Regards,



Nicholas E. Josten
Agent for CCE

Attachments

Cat Creek Energy and Water Storage Renewable Power Station Project (FERC N. 14655) Pre-Application Document
Sample transmittal email

Copies

Cat Creek Energy, LLC