

Via Electronic Filing

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

February 26, 2016

**RE: FERC Project No. 2814
Great Falls Hydroelectric Project
Request for Approval to Use the Traditional Licensing Process**

Dear Secretary Bose:

Pursuant to Section 5.3 of the Commission's regulations, 18 C.F.R. § 5.3, the **City of Paterson, New Jersey** (as successor in interest to the Paterson Municipal Utilities Authority) and the **Great Falls Hydroelectric Company** (Co-Licensees) hereby request use of the Traditional Licensing Process (TLP) for the relicensing of the **Great Falls Hydroelectric Project** (Project). Concurrent with this filing, but under separate cover, the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** are filing their Notice of Intent (NOI) and Pre-Application Document (PAD) for the Project.

The Co-Licensees address below the following considerations to justify the request to use the TLP.

Likelihood of Timely License Issuance [18 C.F.R. § 5.3(c)(1)(ii)(A)]

The TLP will expedite the issuance of a license for the Project by allowing the Co-Licensees to continue communications with resource agencies and interested stakeholders and to reach a resolution of any issues through efficient Project operations and planning. The Co-Licensees are not proposing to change the existing mode of operation or to change the existing Project facilities, which have provided a reliable source of clean renewable energy for local customers. The Co-Licensees and stakeholders are aware of the limited number of issues that are likely to be raised at the Project. Under the TLP, the Co-Licensees will complete the licensing in a timely and efficient manner.

Complexity of the Resource Issues [18 C.F.R. § 5.3(c)(1)(ii)(B)]

To date, in consultation with appropriate stakeholders, the Co-Licensees have not identified any complex resource issues that will need to be addressed during the relicensing process. The existence of the 77 feet (23 m) high Great Falls restricts upstream fish passage, which greatly reduces the complexity of any resource issues. The hydroelectric Project operates as a run-of-river facility with no storage, further reducing the complexity of potential resource issues.

Level of Anticipated Controversy [18 C.F.R. § 5.3(c)(1)(ii)(C)]

As discussed below, the Co-Licensees have already initiated contact, by questionnaire, with resource agencies and potentially interested stakeholders. The responses did not indicate a high level of controversy associated with any of the resource areas. Given the low complexity of issues already identified, it is not currently anticipated that the Project will result in any significant controversy that cannot be overcome through a cooperative TLP process. Therefore, the Co-Licensees believe the TLP will enable them to reach agreement on any protection, mitigation, or enhancement measures that may be appropriate.

Relative Cost of the Traditional Licensing Process Compared to the Integrated Licensing Process [18 C.F.R. § 5.3(c)(1)(ii)(D)]

The Project is considered to be a relatively non-complex run-of-river hydroelectric facility. The more flexible nature of the TLP will provide the Co-Licensees and the other stakeholders the flexibility to schedule meetings and develop pre-filing documentation. Further, this flexibility will allow all relicensing parties to perform such activities in coordination with other ongoing, routine activities. This flexibility will help reduce the overall cost of the relicensing effort. In this way, the Co-Licensees believe that the TLP will be more cost efficient, due to a potentially shorter period of pre-application activity, the preparation of fewer formal documents and filings, and the subsequent reduction of legal reviews associated with such filings. This reduction in formal filings will not only benefit the Co-Licensees, but will also benefit agencies, other licensing participants, and the FERC. Thus, the Co-Licensees believe that the TLP would be less costly than the Integrated Licensing Process and thus the most economical way to proceed.

The Amount of Available Information and Potential for Significant Disputes Over Studies [18 C.F.R. § 5.3(c)(1)(ii)(E)]

As shown in the PAD developed by the Co-Licensees, there is extensive information available regarding the Project's environmental setting, effects on the environment, and the run-of-river operations of the Project. A PAD questionnaire was sent to the FERC Initial Contact List for New Jersey. The questionnaire responses resulted in the production of a significant amount of existing information and data sources, and they identified few areas in which data is lacking or non-existent. To date, no specific studies have been requested, and no disputes have arisen over the need for resource studies. Therefore, the Co-Licensees are confident that, in working with resource agencies and interested stakeholders, they will be able to develop studies or data collection efforts that will address any concerns associated with the Project and that might generate significant dispute.

Other Pertinent Factors [18 C.F.R. § 5.3(c)(1)(ii)(F)]

The Co-Licensees believe that another important factor in the FERC's consideration is that the Project is a relatively non-controversial, run-of-river hydroelectric facility. Though non-operational for a period of time and ultimately rehabilitated under the expiring FERC license, the existing hydroelectric plant has been in existence since 1914. The dam has been in existence

since 1840. The primary Project features are thus well-known quantities among the community and resource agencies.

The Co-Licensees believe that the TLP will result in a successful relicensing process and will provide the most efficient, effective, and least burdensome process for all stakeholders interested in the relicensing proceeding for the Project.

Conclusion

For all of the foregoing reasons, the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** respectfully request that the FERC grant this request and authorize the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** to use the TLP for the licensing of this non-controversial Project.

As required by 18 C.F.R. § 5.3(d)(1), the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** are concurrently providing copies of this request to all affected resource agencies, Native American Tribes, and other potentially interested parties. As required by 18 C.F.R. § 5.3(d)(2), the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** are publishing notice of this request simultaneously with the publication of notice of availability of the NOI and PAD in The Star Ledger of general circulation in the counties where the Project is located.

By this letter, the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** are notifying the resource agencies, Native American Tribes, and other potentially interested parties that comments on this request to use the TLP must be provided to the FERC and the **City of Paterson, New Jersey** and the **Great Falls Hydroelectric Company** no later than 30 days following the filing date of this document. All comments should reference **Project No. 2814 - Great Falls Hydroelectric Project**, and they should address, as appropriate to the circumstances of the request, the following topics:

- Likelihood of timely license issuance;
- Complexity of the resource issues;
- Level of anticipated controversy;
- Relative cost of the TLP compared to the ILP;
- The amount of available information and potential for significant disputes over studies; and
- Other factors believed by the commenter to be pertinent.

Comments should be submitted to the FERC electronically pursuant to 18 C.F.R. § 385.2003(c), or by sending an original and eight copies to:


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

Copies of the comments should also be sent to the Co-Licensees at the following addresses:

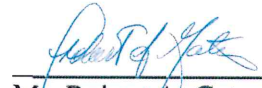
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Respectfully submitted by,


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For City of Paterson, NJ


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