



Via Electronic Filing

February 27, 2020

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

**Re: Sartell Hydroelectric Project (FERC Project No. 8315)
Notification of Intent to File License Application, Request to Use the Traditional Licensing
Process, Request for Designation of Non-Federal Representative, and Pre-Application Document**

Dear Secretary Bose:

Eagle Creek Sartell Hydro, LLC (Sartell Hydro), a wholly owned indirect subsidiary of Eagle Creek Renewable Energy, LLC, is preparing to relicense the Sartell Hydroelectric Project (FERC Project No. 8315) (Sartell Project, Project) with the Federal Energy Regulatory Commission (FERC or Commission). Sartell Hydro is the Licensee and owns and operates the Project. The Project is located on the Mississippi River in Benton and Stearns Counties, Minnesota. The current FERC license will expire on February 28, 2025.

In accordance with the Commission's regulations, Sartell Hydro hereby declares its unequivocal intent to begin the relicensing process for the Project by filing the enclosed Notice of Intent (NOI) to file an application for a new license and a Pre-Application Document (PAD).

Under 18 CFR § 5.3, Sartell Hydro hereby requests approval from the Commission for use of the Traditional Licensing Process (TLP) for the Project, also enclosed.

In accordance with 18 CFR § 5.5 (c) and 5.6(a)(1) of the Commission's regulations, Sartell Hydro is also distributing electronic copies of the NOI, request to use the TLP, and PAD to appropriate federal, state, and interstate resource agencies as well as Indian Tribes, local governments, and members of the public likely to be interested in the relicensing proceeding under this transmittal. This transmittal is being provided to the individuals listed on the attached stakeholder distribution list. These electronic copies are being distributed to each stakeholder on the distribution list via an email, or where an email address is not available, via a hardcopy of this correspondence, with the link or website address to the documents on Eagle Creek Renewable Energy's website (below). Electronic copies are also available on the Commission's eLibrary website at <https://elibrary.ferc.gov/idmws/search/fercgensearch.asp> and searching for docket P-8315. Sartell Hydro is also providing two paper courtesy copies of the NOI, TLP Request, and PAD to Commission

Staff in the Office of Energy Projects and the Office of General Counsel-Energy Projects as outlined in the Commission's filing guidelines.

Under 18 CFR § 5.3 (d)(2), Sartell Hydro published a notice on February 19, 2020 in the St. Cloud Times, a daily newspaper of general circulation in Benton and Stearns Counties. The notice included the filing date of the NOI, the request to use the TLP and the PAD; summarized the documents filed and the basis of the request to use the TLP; it also included the project number, the licensee's name, address and telephone number; indicated comments are due within 30 days of the filing date, and stated respondents must submit comments to the Secretary of the Commission in accordance with filing procedures outlined in the Commission's website at <http://FERC.gov>.

The NOI, TLP Request, and PAD are available for public inspection and copying during normal business hours at the Great River Regional Library located at 1300W St. Germain Street, St. Cloud, MN as well as on the Project's relicensing website: <http://www.eaglecreekre.com/sartell-relicensing>.

As required by 18 CFR § 5.3(d)(1), comments regarding Sartell Hydro's request to use the TLP to relicense the Project must be filed with the Commission within 30 days of this filing (by Monday, March 30, 2020) and must reference FERC Project No. 8315.

Sartell Hydro believes the Commission will issue a public notice of the NOI and PAD, and then will issue a Notice of Commencement (NOC) no later than 60 days following the filing of the NOI, PAD, and TLP Request. If the Commission approves Sartell Hydro's request to use the TLP to relicense the Project, Sartell Hydro will hold a Joint Meeting and Site Visits for the Project between 30 and 60 days of the NOC issuance, which is proposed to be conducted no later than June 30, 2020. Within 60 days following the Joint Meeting and Site Visit, interested parties must file written comments on the PAD and study requests with the Commission, with a copy provided to Sartell Hydro.

Some of the information included in the PAD is considered Critical Energy Infrastructure Information (CEII) as defined by 18 CFR § 388.113(c). Other confidential financial information as defined by 18 CFR §388.112, is also included in the PAD. This information has been removed from the public version of the PAD and Sartell Hydro respectfully requests such information be treated as privileged.

In accordance with 18 CFR § 5.5(e), Sartell Hydro formally requests designation as the Commission's non-federal representative in relicensing the Sartell Hydroelectric Project for consultation with the U.S. Fish and Wildlife Service and/or National Oceanic and Atmospheric Administration (NOAA) Fisheries under Section 7 of the Endangered Species Act and the joint agency regulations thereunder at 50 CFR part 402; and NOAA Fisheries under Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act; and The Minnesota State Historic Preservation Officer under Section 106 of the National Historic Preservation Act and implementing regulations of the Advisory Council on Historic Preservation at 36 CFR 800.2(c)(4).

If you have any questions regarding this submittal or NOI, PAD, and TLP Request please contact me at (973) 998-8400 or michael.scarzello@eaglecreekre.com.

Sincerely,
Eagle Creek Sartell Hydro, LLC



Michael Scarzello
Regulatory Director

Attachments: P-8315 Sartell NOI and Request for TLP
Certificate of Service and Distribution List
P-8315 Sartell PAD Public
P-8315 Sartell PAD Exhibit F **CUI//CEII**
P-8315 Sartell PAD Project Net **CUI//PRIV**

**NOTICE OF INTENT
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION
TO FILE AN APPLICATION
FOR NEW LICENSE
SARTELL HYDROELECTRIC PROJECT
FERC PROJECT NO. 8315**

Pursuant to 18 CFR § 5.5, Eagle Creek Sartell Hydro, LLC (“Licensee” or “Applicant” or “Sartell Hydro”), a wholly-owned indirect subsidiary of Eagle Creek Renewable Energy, LLC, hereby declares to the Federal Energy Regulatory Commission its intent to file an Application for a New License for the Sartell Hydroelectric Project No. 8315 (“Project”, “Sartell”, “Sartell Project” or “Sartell Hydroelectric Project”). The current Project license was issued on March 13, 1985, effective March 1, 1985, and expires on February 28, 2025. Accordingly, the Licensee shall file an Application for a New License no later than February 28, 2023.

The following information is provided consistent with the requirements of 18 CFR § 5.5:

(1) Applicants Name and Address:

Applicant’s Name: Eagle Creek Sartell Hydro, LLC

Address: Eagle Creek Renewable Energy, LLC
116 N. State Street
P.O. Box 167
Neshkoro, WI 54960-0167

Telephone: (973) 998-8400

(2) Project Number:

The FERC Project No. is 8315.

(3) License Expiration Date

February 28, 2025

(4) Statement of Intent to File:

Sartell Hydro unequivocally intends to file an Application for a New License for the Sartell Hydroelectric Project using the Commission’s Traditional Licensing Process (TLP). The Applicant’s request and justification for using the TLP is attached hereto.

(5) Type of Principal Project Works to be Licensed:

The Sartell Project consists of the following: (1) a 46-foot-high and 388-foot-long concrete dam with 2 bascule gates and 3 tainter gates; (2) a reservoir with a maximum surface area of 2,400 acres and a maximum storage capacity of approximately 15,500 acre-feet at

elevation 1014.5 feet National Geodetic Vertical Datum 1929 (NGVD) as listed in the current license (3) a concrete powerhouse that houses eleven generating units with a total authorized capacity of 8,925 kW; (4) a floodwall in the west abutment of the dam approximately 494.5 feet long and aligned parallel to the river; (5) the .48/2.4-kV generator leads; (6) one 2-MVA .48/2.4-kV 3-phase step-up transformer; (7) one 10-MVA 2.4/34.5-kV 3-phase step-up transformer; (8) approximately 715 feet of 34.5 kV transmission line across the dam; and (9) appurtenant facilities.

(6) Project Location:

State or Territory: Minnesota
 Counties: Benton and Stearns Counties
 City: Sartell
 Waterway: Mississippi River
 Latitude: 42.6849
 Longitude: -89.0265

(7) The Installed Capacity of the Project is: 8,925 kW

Powerhouse

Bay No. 1:	N/A (no turbine or generator)
Bay No. 2:	806.25 kW
Bay No. 3:	806.25 kW
Bay No. 4:	806.25 kW
Bay No. 5:	806.25 kW
Bay No. 6:	750 kW
Bay No. 7:	750 kW
Bay No. 8:	750 kW
Bay No. 9:	750 kW
Bay No. 10:	900 kW
Bay No. 11:	900 kW
<u>Bay No. 12:</u>	<u>900 kW</u>
Total:	8,925 kW

(8) Names and Mailing Addresses of Entities Listed in 18 CFR 5.5(b)(8):

Every county in which any part of the project is located, and in which any Federal facility that is used or to be used by the project is located:

Mr. Montgomery Headly, Administrator
 Benton County
 531 Dewey Street
 Foley, MN 56329

Mr. Michael Williams, Administrator
Stearns County Administrator
705 Courthouse Square Room 121
St. Cloud, MN 56303-4701

The Project uses no federal facilities and occupies no federal lands.

Each city, town or similar political subdivision in which any part of the Project is located, and in which any federal facility that is used or to be used by the Project is located:

City Clerk
City of Rice
205 Main Street, PO Box 179
Rice, MN 56367

Ms. Mary Degiovanni, City Administrator
City of Sartell
125 Pinecone Road, N.
Sartell, MN 56377

Ms. Connie Pesta, Clerk
Township of Brockway
43710 85th Avenue, N.
Rice, MN 56367

Mr. Mark Petron, Chairperson
Township of Langola
15245 Barley Road NW
Royalton, MN 56373

Ms. Marlyce Plante, Clerk
Township of Le Sauk
2339 Pinecone Road
Sartell, MN 56377

Mr. Dan Zwick, Chairman
Township of Sauk Rapids
4749 Mayhew Lake Road, NE
Sauk Rapids, MN 56379

Ms. Julie Johnson, Chairperson
Township of Watab
660 75th St. NW
Sauk Rapids, MN 56379

The Sartell Hydroelectric Project does not use any federal facilities and occupies no federal lands.

Each city or town that has a population of 5,000 or more people and is located within 15 miles of the existing Project dams:

The following cities and towns each have a population of 5,000 or more people (2010 U.S. Census data), and are located within 15 miles of the Project powerhouse:

Ms. Mary Degiovanni, City Administrator
City of Sartell
125 Pinecone Road, N.
Sartell, MN 56377

Mr. Ross Olson, City Administrator-Clerk
City of Sauk Rapids
250 Summit Avenue, N.
Sauk Rapids, MN 56379

Mr. Dave Kleis, Mayor
City of St. Cloud
400 2nd Street S.
St. Cloud, MN 56301

Ms. Kris Ambuehl, City Administrator
City of St. Joseph
75 Calloway Street, E.
St. Joseph, MN 56374

Ms. Shaunna Johnson, Administrator
City of Wait Park
19 13th Avenue, N.
Waite Park, MN 56387

Each irrigation district, drainage district, or similar special purpose political subdivision in which any part of the Project is located, and in which any Federal facility that is used or to be used by the Project is located:

There is no irrigation district, drainage district, or similar special purpose political subdivision in which any part of the Project is located or that owns, operates, maintains, or uses any Project facility. The Project uses no federal facilities and occupies no federal lands.

Each irrigation district, drainage district, or similar special purpose political subdivision that owns, operates, maintains, or uses any Project facility or any Federal facility that is or is proposed to be used by the Project:

There is no irrigation district, drainage district, or similar special purpose political subdivision in which any part of the Project is located or that owns, operates, maintains, or uses any Project facility. The Project uses no federal facilities and occupies no federal lands.

Every other political subdivision in the general area of the Project that there is reason to believe would likely be interested in, or affected by, this notification:

There is no other political subdivision in the general area of the Project that there is reason to believe would likely be interested in, or affected by, this notification.

Affected Indian Tribes:

Ms. Jamie Arsenault, THPO

White Earth Band of the Minnesota Chippewa Tribe
P.O. Box 418
White Earth, MN 56591
jamie.arsenault@whiteearth.com

Mr. Mark L. Azure, President

Fort Belknap Indian Community of the
Fort Belknap Reservation of Montana
656 Agency Main St.
Harlem, MT 59526-9455

Mr. Bryan Bainbridge, Chairman

Red Cliff Band of Lake Superior Chippewa
88385 Pike Rd., Hwy. 13
Bayfield, WI 54814

Mr. Max Bear, THPO

Cheyenne and Arapaho Tribes of Oklahoma
700 Black Kettle Blvd.
Concho, OK 73022
mbear@c-a-tribes.org

Ms. Melanie Benjamin, Chief Executive

Mille Lacs Chippewa Tribe
43408 Odena Dr., HC 67
Onamia, MN 56359

Mr. Gary Besaw, Chairman

Menominee Indian Tribe of Wisconsin
P.O. Box 910
Keshena, WI 54135-0910

Mr. Brian Bisonette, THPO

Lac Courte Oreilles Band of Chippewa Indians
13394 West Trepania Road, Bldg. NO1
Hayward, WI 54543

Mr. Michael Blackwolf, THPO

Fort Belknap Indian Community of the
Fort Belknap Reservation of Montana
656 Agency Main Street
Harlem, MT 59526-9455
mblackwolf@ftbelknap.org

Mr. Robert Blanchard, Chairman

Bad River Band of the Lake Superior
Tribe of the Chippewa
P.O. Box 39
Odanah, WI 54861-0039

Ms. Shelley Buck, President

Prairie Island Indian Community of Minnesota
5636 Sturgeon Lake Rd.
Welch, MN 55089
jody.johnson@piic.org

Ms. Amy Burnette, THPO

Leech Lake Band of Ojibwe
115 6th St. NW, Suite E.
Cass Lake, MN 56633
amy.burnette@llojibwe.org

Ms. Catherine Chavers, Chairwoman

Bois Forte Band of Minnesota Chippewa
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Nett Lake, MN 55772
cchavers@boisforte-nsn.gov

Ms. Catherine Chavers, President

Chippewa Tribe of Minnesota
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Cass Lake, MN 56633-0217
cchavers@boisforte-nsn.gov

Mr. Marvin Defoe, THPO

Red Cliff Band of Lake Superior Chippewa Indians
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Bayfield, WI 54814
marvin.defoe@redcliff-nsn.gov

Ms. Dianne Desrosiers, THPO

Sisseton-Wahpeton Oyate of the
Lake Traverse Reservation
P.O. Box 907
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dianned@swo-nsn.gov

Ms. Karen R. Diver, Chairwoman

Fond du Lac Reservation Business Committee
1720 Big Lake Rd.
Cloquet, MN 55720-9702

Ms. Beth Drost, Chairwoman

Grand Portage Band of Chippewa Indians
P.O. Box 428
Grand Portage, MN 55605-0428

Mr. Norman Dupuis, Chairman

Grand Portage Reservation Business Committee
P.O. Box 428
Grand Portage, MN 55604-0428

Mr. Kevin Dupuis, Sr., Chairman

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Sisseton-Wahpeton Oyate of the
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Keshena, WI 54135-0910
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Mr. Edward Hamilton, Governor

Cheyenne and Arapaho Tribes of Oklahoma
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Ms. Jill Hoppe, THPO

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Mr. Mic Isham, Chairman

Lac Courte Oerilles Band of Chippewa Indians
13394 W Trepania Rd., Bldg. NO1
Hayward, WI 53843-2186

Mr. Faron Jackson, Sr., Chairman

Leech Lake Band of Chippewa Indians
190 Sailstar Dr. NW
Cass Lake, MN 56633

Mr. Kevin Jensvold, Chairman

Upper Sioux Community of Minnesota
P.O. Box 147
Granite Falls, MN 56241-0147

Mr. Garrie Kills A Hundred, THPO

Flandreau Santee Sioux Tribe
P.O. Box 283
Flandreau, SD 57028-0283
garrie.killsahundred@fsst.org

Mr. Bob Komardley, Chairman

Apache Tribe of Oklahoma
P.O. Box 1330
Anadarko, OK 73005

Mr. Robert L. Larsen, President

Lower Sioux Indian Community
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Morton, MN 56270
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Mr. Bill Latady, THPO

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Ms. Edith Leoso, THPO

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Tribe of the Chippewa
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Ms. Chrystal Lightfoot, Cultural Resource Contact

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Anadarko, OK 73005

Dr. Erich Longie, THPO

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Fort Totten, ND 58335
thpo@gondtc.com

Mr. Gary F. Loonsfoot, THPO

Keweenaw Bay Indian Community of Michigan
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Ms. Daisy McGeshick, THPO

Lac Vieux Desert Band of Lake
Superior Chippewa Indians
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Mr. Garland McGeshick, Chairman

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Ms. Samantha Odegard, THPO

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SamanthaO@uppersiouxcommunity-nsn.gov

Mr. Clinton Parish, Chairman

Bay Mills Indian Community of Michigan
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Brimley, MI 49715-9319

Ms. Myra Pearson, Chairwoman

Spirit Lake Tribe
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Fort Totten, ND 58335-0359

Mr. Anthony Reider, President

Flandreau Santee Sioux Tribe
P.O. Box 283
Fandreau, SD 57028-0283

Mr. Darrell G. Seki, Sr., Chairman

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Keweenaw Bay Indian Community of Michigan
107 Bear Town Rd.
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Mr. Roger Trudell, Chairman

Santee Sioux Tribal Council
108 Spirit Lake Ave. W.
Niobrara, NE 68760

Mr. Charles R. Vig, Chairman

Shakopee-Mdewakanton Sioux
Community of Minnesota
2330 Sioux Trl. NW
Prior Lake, MN 55372-9077

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Ms. Natalie Weyaus, THPO

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Ms. Duane Whipple, THPO

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Mr. Joseph Wildcat, Sr., President

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Superior Chippewa Indians
P.O. Box 67
Lac Du Flambeau, WI 54538-0067

Mr. James Williams, Jr., Chairman

Lac Vieux Desert Band of Lake
Superior Chippewa Indians
P.O. Box 249
Watersmeet, MI 49969-0249

Ms. Melinda Young, THPO

Lac Du Flambeau Band of Lake
Superior Chippewa Indians
P.O. Box 67
Lac Du Flambeau, WI 54538
ldfthpo@ldftribe.com

All correspondence and service of documents related to this Notice of Intent and subsequent proceedings should be addressed to:

Mr. Michael Scarzello
Regulatory Director
Eagle Creek Renewable Energy, LLC
116 State Street
PO Box 167
Neshkoro, WI 54960

If you have any questions regarding this Notice of Intent or require additional information please call Mr. Scarzello at 973-998-8400 or Michael.Scarzello@eaglecreekre.com or Shawn Puzen at 920-593-6865 or Shawn.Puzen@MeadHunt.com.

SARTELL HYDROELECTRIC PROJECT
FERC PROJECT NO. 8315
REQUEST TO USE THE TRADITIONAL LICENSING PROCESS

Eagle Creek Sartell Hydro, LLC (Sartell Hydro or Applicant), Licensee for the Sartell Hydroelectric Project (Project or Sartell Project), is including in this filing a request to use the Federal Energy Regulatory Commission's (FERC) Traditional Licensing Process (TLP) for the Project. Justification for this request, as required by 18 CFR § 5.3, is provided below. Any comments on the Applicant's request to use the TLP must be filed with the Commission within 30 days of the filing date of the request.

Likelihood of Timely License Issuance (18 CFR § 5.3(c)(1)(ii)(A))

Sartell Hydro anticipates FERC will be able to complete the timely issuance of a new license for the Project by approving the use of the TLP. The agencies and Non-Governmental Organizations (NGOs) that are participating in the relicensing have been involved in relicensing proceedings with other hydroelectric projects and have experience using the TLP. In preparing the Pre-Application Document (PAD), Sartell Hydro, agencies, and other stakeholders have informally consulted regarding issues related to the relicensing, and they are aware of the limited number of issues that are likely to be raised during the relicensing proceeding.

As described in Section 2 (*Process Plan and Schedule (18 CFR § 5.6(d)(1))*) of the PAD for the Project, Sartell Hydro intends to complete and distribute the draft license application for the Project by February 28, 2023. The Process Plan and Schedule will allow Sartell Hydro to consult with agencies and other stakeholders regarding study plans, collect and analyze the necessary field data, and incorporate the study results into the final license application.

Complexity of the Resource Issues (18 CFR § 5.3(c)(1)(ii)(B))

The proposed Project is an existing FERC-licensed project of a conventional hydro design that has well-known and understood minimal impacts. As described in the PAD, there is existing resource information available for the project area. Under Article 34 of the FERC license, the Project is required to operate in an instantaneous run-of-river mode for the protection of fish and wildlife resources in the Mississippi River. The Licensee also is required to maintain elevation of the reservoir between 1014.0 feet NGVD and 1015.0 feet NGVD (1014.5 ± 0.5 ft).

Sartell Hydro owns very little upland property associated with the Project and does not expect the resource issues to be complex as Sartell Hydro is not proposing changes to project facilities or operations.

Due to the limited geographic scope of the potential Project impacts, a relatively straightforward relicensing process is envisioned to generate the needed information to support the development of a complete license application. A list of identified resource issues

and how these will be addressed in the study program is included in Section 5 (*Preliminary Issues and Studies List (18 CFR § 5.6(d)(4))*) of the PAD.

Based upon the information obtained during the questionnaire consultation in preparation of the PAD included in Section 6 (*Consultation in Preparation of the PAD (18 CFR § 5.6(d)(5))*), where Sartell Hydro received resource agency comments with only the MPCA opposing the use of the TLP, since they were not familiar with the differences between the ILP and the TLP, Sartell Hydro believes that any additional remaining resource issues will be identified through the Joint Agency Public Meeting and Site Visit, and through subsequent consultation activities.

Level of Anticipated Controversy (18 CFR § 5.3(c)(1)(ii)(C))

Sartell Hydro anticipates very limited or no controversy associated with the relicensing of the Project. Sartell Hydro has initiated informal consultation and outreach with the resource agencies and potential stakeholders to gain existing information about Project resources, and to consider resource issues and management goals that will need to be considered during the process.

Sartell Hydro is not anticipating substantial public involvement or interest in the relicensing process given the location and nature of the Project.

Given the low complexity of issues already identified to date at the Project, it is not anticipated that the relicensing process will result in any significant controversy that cannot be resolved within the TLP. Sartell Hydro believes that the TLP is a process that will enable the Applicant and stakeholders to reach agreement on protection, mitigation, and enhancement measures for the Project, as may be determined to be necessary.

Relative Cost of the Traditional Process Compared to the Integrated Process (18 CFR § 5.3(c)(1)(ii)(D))

Sartell Hydro believes that the TLP is the most efficient process to use for the Project, which is characterized by its relatively small size and no proposed changes to the current operation. Given the limited geographic scope of the Project boundary, the limited number of anticipated issues, the limited number of potential stakeholders, and the low level of controversy, Sartell Hydro believes that the TLP is better suited to license the Project from a cost standpoint than the Integrated Licensing Process (ILP). Experience to date at other projects nationwide demonstrates that the ILP is more costly to Licensees compared to the TLP. For projects with limited geographic scope and related issues, significant process cost savings can be realized using the TLP. Sartell Hydro believes that, given the circumstances at this Project, the TLP can be a more efficient relicensing process than the ILP. The Project licensing should proceed smoothly with the TLP, through consultation during designated phases in the process.

The timelines and more flexible nature of the TLP will provide Sartell Hydro and other stakeholders more flexibility to schedule meetings and develop pre-filing documentation. This flexibility will better allow all relicensing parties to perform such activities in coordination with

other ongoing relicensings and routine regulatory activities. The flexibility afforded by following the TLP will help reduce the overall cost of the relicensing effort for both the Licensee and stakeholders.

The Amount of Available Information and Potential for Significant Disputes over Studies (18 CFR § 5.3(c)(1)(ii)(E))

Preparation of the PAD and outreach/consultation with agencies and stakeholders has indicated there is a reasonable amount of available information regarding resources associated with the Project, much of which comes from the previous relicensing and state biological surveys and environmental monitoring. A USGS gage is located upstream of the Project, so an adequate flow record is available. Based on initial informal consultation conducted as part of the preparation of the PAD, it is anticipated that the information contained in the PAD will provide agencies and stakeholders with much of the information necessary to clarify any Project related issues or concerns, and to identify any additional study or data needs to be addressed by Sartell Hydro through the TLP.

As discussed above, the Project has a small footprint and hence an equally limited effect on existing resources. It is Sartell Hydro's intent to conduct its pre-filing consultation in a manner that addresses and resolves, to the extent possible, any differences of opinion with regard to the design and implementation of any necessary studies. Due to the small geographic area of Project impacts, required field information can be collected in a relatively short amount of time. Sartell Hydro does not anticipate significant disputes over any necessary studies.

Other Factors Believed by the Applicant to be Pertinent (18 CFR § 5.3(c)(1)(ii)(F))

In conclusion, Sartell Hydro affirms that for the relicensing of this relatively small, straightforward project, the TLP will provide the most efficient, effective, and least burdensome process for relicensing the Sartell Hydroelectric Project. Sartell Hydro believes that this justification provides good cause for the Commission to grant this request to use the TLP and appreciates the Commission's consideration of this request.

CERTIFICATE OF SERVICE

I hereby certify that I, on behalf of Eagle Creek Sartell Hydro, LLC have this day caused to be served, either by First Class Mail, delivery service, or electronic mail, the Notice of Intent to File Application for New License upon all interested parties designated on the attached distribution list, which includes, but is not limited to all interested parties designated on the service lists for the Sartell Hydroelectric Project, Project No. 8315, in accordance with Rule 2010 of the Rules of Practice and Procedure, 18 CFR §385.2010.

February 27, 2020

Eagle Creek Sartell Hydro, LLC,

A handwritten signature in black ink, appearing to read "MSR", is written above a horizontal line.

Michael Scarzello
Director

Sartell (P-8315) Stakeholder List

Indian Tribes

Jamie Arsenault, THPO

White Earth Band of the Minnesota Chippewa
Tribe
P.O. Box 418
White Earth, MN 56591
jamie.arsenault@whiteearth.com

Mark L. Azure, President

Fort Belknap Indian Community of the Fort
Belknap Reservation of Montana
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Bryan Bainbridge, Chairman

Red Cliff Band of Lake Superior Chippewa
88385 Pike Rd., Hwy. 13
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Max Bear, THPO

Cheyenne and Arapaho Tribes of Oklahoma
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