



Kezar Falls Hydro, LLC
c/o Eagle Creek Renewable Energy, LLC
7315 Wisconsin Avenue, Suite 1100W
Bethesda, Maryland 20814
240.482.2700

Via Electronic Filing

September 30, 2025

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Request for Approval to Use the Traditional Licensing Process for the Kezar Falls Hydropower Project (FERC Project No. 9340)

Dear Secretary:

Pursuant to Section 5.3 of the Commission's regulations, 18 CFR § 5.3, Kezar Falls Hydro, LLC ("KFH" or the "Applicant"), hereby requests authorization to use the Traditional Licensing Process ("TLP") for the Kezar Falls Hydropower Project (the "Project"). Concurrently with this filing, and under separate cover, KFH is filing its Notification of Intent (NOI) and Pre-Application Document (PAD) for the Project.

In support of this request, KFH addressed the considerations identified in 18 CFR § 5.3(c)(1)(ii) as follows:

Likelihood of timely license issuance [18 CFR § 5.3(c)(1)(ii)(A)]

The Project comprises of two developments (Upper and Lower), both operated run-of-river mode with no use of storage. KFH is not proposing changes to project operation or structures. The involved resource agencies are familiar with the Federal Energy Regulatory Commission ("FERC") licensing in this watershed, which should facilitate efficient review and timely license issuance.

Complexity of the resource issues [18 CFR § 5.3(c)(1)(ii)(B)]

Recent and ongoing relicensing proceedings in the area, along with publicly available datasets and prior studies, provide a strong baseline. KFH does not anticipate unresolved or novel issues requiring complex study design beyond established methods.

Level of anticipated controversy [18 CFR § 5.3(c)(1)(ii)(C)]

Based on preliminary outreach, alignment with resource management goals, and ongoing work at nearby projects, KFH does not anticipate significant controversy. We expect a collaborative, science-based process to inform license terms and conditions.

Relative cost of TLP vs. ILP [18 CFR § 5.3(c)(1)(ii)(D)]

The TLP's schedule flexibility and stepwise consultation are expected to reduce overall transaction costs for all participants compared to the ILP while preserving robust stakeholder engagement.

Available information and potential for study disputes [18 CFR § 5.3(c)(1)(ii)(E)]

Existing project assessments, regional relicensing records, state and federal GIS resources, and public literature are expected to support scoping and study design, minimizing the potential for significant disputes over studies.

Other pertinent factors [18 CFR § 5.3(c)(1)(ii)(F)]

KFH is committed to a collaborative, cooperative, transparent process with agencies, Tribes, and stakeholders to evaluate and implement appropriate, science-based license conditions.

As required by 18 CFR § 5.3(d)(1), KFH is concurrently providing copies of this request to affected resource agencies, Tribes, and other interested parties. As required by 18 CFR § 5.3(d)(2), KFH is publishing notice of this request simultaneously with notice of availability of the NOI and PAD in The Sun Journal, a newspaper of general circulation in the counties where the Project is located.

With this letter, KFH notifies recipients that comments on this request must be filed with the Commission and provided to KFH no later than 30 days from the filing date of this document. All comments should reference: *"Project No. 9340 – Kezar Falls Hydropower Project"*. Commenters are encouraged to file electronically pursuant to 18 CFR § 385.2003(c) addressing, 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 submitted to the Commission electronically pursuant to 18 CFR § 385.2003(c), or by sending paper submittals to:

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

Copies of the comments sent to the Applicant using the contact information below:

Respectfully submitted,



Melissa Rondou
Director, Licensing and Compliance
Kezar Falls Hydro, LLC
7315 Wisconsin Avenue, Suite 1100W
Bethesda, Maryland 20814
melissa.rondou@eaglecreekre.com