## FEDERAL ENERGY REGULATORY COMMISSION WASHINGTON, D.C. 20426 December 14, 2017

OFFICE OF ENERGY PROJECTS

Project Nos. 2082-063 and 14803-001— Oregon and California Klamath and Lower Klamath Projects PacifiCorp and Klamath River Renewal Corporation

Ms. Sarah Kamman Vice President and General Counsel PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, OR 97232

Mr. Michael Carrier, President Klamath River Renewal Corporation 423 Washington Street, 3rd Floor San Francisco, CA 94111

**Reference: Request for Extension of Time** 

Dear Ms. Kamman and Mr. Carrier:

On December 5, 2017, the Klamath River Renewal Corporation (Renewal Corporation) filed a request for an extension of time to fully respond to the July 14, 2017 staff Additional Information Request (AIR) concerning the proposed surrender and removal of four dams currently part of PacifiCorp's Klamath Hydroelectric Project No. 2082.

## Background

On September 23, 2016, PacifiCorp and the Renewal Corporation filed a joint application for a license amendment and transfer for the Klamath Hydroelectric Project. The amendment/transfer application requests that the Commission amend the license for the project by removing the J.C. Boyle, Copco No. 1, Copco No. 2, and Iron Gate developments from the license and transferring them from PacifiCorp to the Renewal Corporation, thereby creating a new project, the Lower Klamath Project No. 14803, with

the Renewal Corporation as the sole licensee. On the same day, the Renewal Corporation filed an application to surrender the license for the Lower Klamath Project.<sup>1</sup>

The surrender application requests that we take no action on it, until after the Renewal Corporation has accepted the license transfer. Further, the surrender application states that by December 31, 2017, the Renewal Corporation will file its updated decommissioning plan² for the Commission's environmental review. Based on a preliminary review of the surrender application, on July 14, 2017, staff issued an AIR containing 29 items related to staff's environmental analysis of the proposed surrender and decommissioning, including the updated decommissioning plan. The AIR required a response by December 31, 2017, the same time the Renewal Corporation was to submit its updated decommissioning plan.

## Extension of Time Request

The Renewal Corporation's extension of time request specifies that it will address 9 of the 29 items in the AIR by the December 31, 2017 due date, and requests an extension of time until July 1, 2018, to respond to the remaining 20 items, including the updated decommissioning plan. The Renewal Corporation states that it is unable to complete the updated decommissioning plan and the associated 20 AIR items by December 31, 2017, due to the difficulty and complexity associated with field work and the necessary subsequent technical analyses.

Although the requested extension may not allow enough time for the Commission to act on the surrender application by December 31, 2019, as requested by the Renewal Corporation, staff needs these AIR items, including the updated and more detailed decommissioning plan, for its environmental analysis. Therefore, the requested extension of time is granted. Please file your response to the 20 AIR items specified in the December 5, 2017 extension of time request, including the updated decommissioning plan, by July 1, 2018.

<sup>&</sup>lt;sup>1</sup> As explained in the Commission's November 10, 2016 public notice of the applications filed, pending Commission action on the license amendment and transfer request, the surrender application is deemed to be filed by both PacifiCorp and Renewal Corporation.

<sup>&</sup>lt;sup>2</sup> PacifiCorp and the Renewal Corporation refer to this updated plan as the "Definite Plan for Facilities Removal."

If you have any questions regarding this letter, please contact John Mudre at (202) 502-8902 or at john.mudre@ferc.gov.

Sincerely,

Vince Yearick

Director

Division of Hydropower Licensing