Licensing New Development

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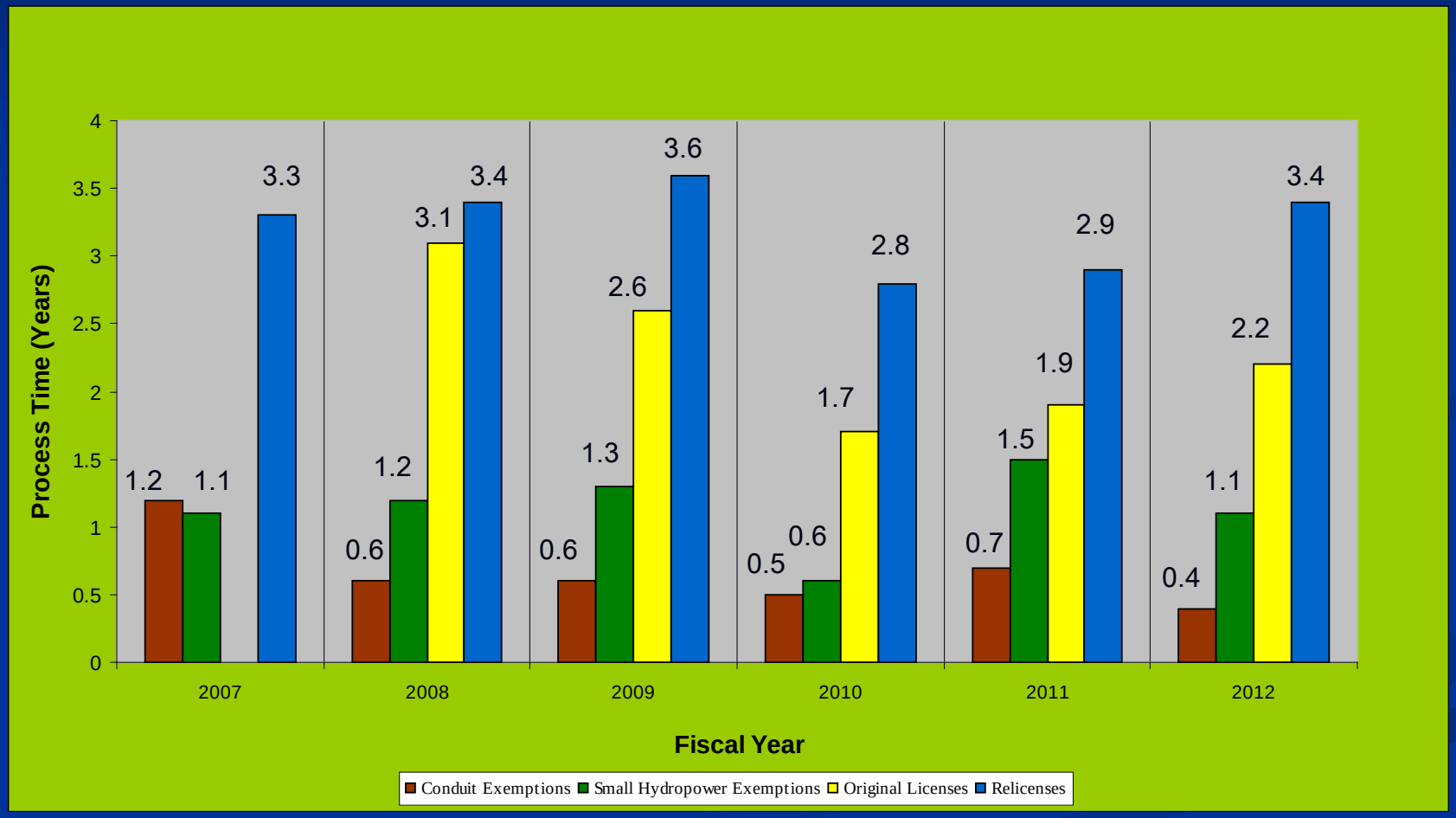
Big Three Challenges
(given - distributed decision making)

- Appropriate studies and needed information
  - scope of project effects
  - methodology
- Complete application
  - project description – facilities and operation
  - description of environment
  - analysis of effects
- Parallel processing

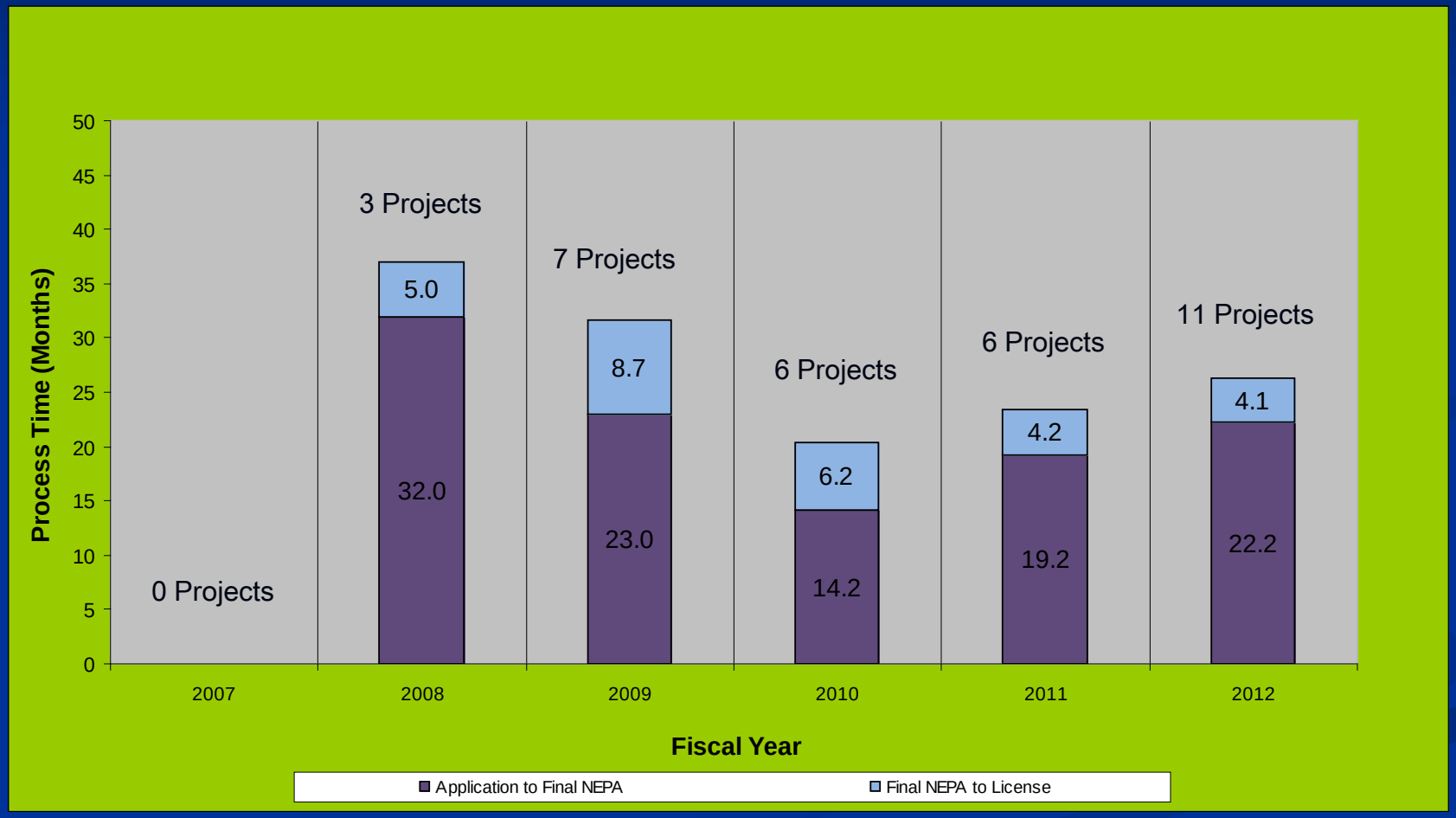
What Are Applicants Doing That Expedite Processing

- Choosing good sites
- Engaging with FERC staff early and often
- Using FERC website and templates
- Seeking face to face meetings with agencies
- Addressing agency concerns
- Requesting staff review of draft applications
- Seeking appropriate waivers

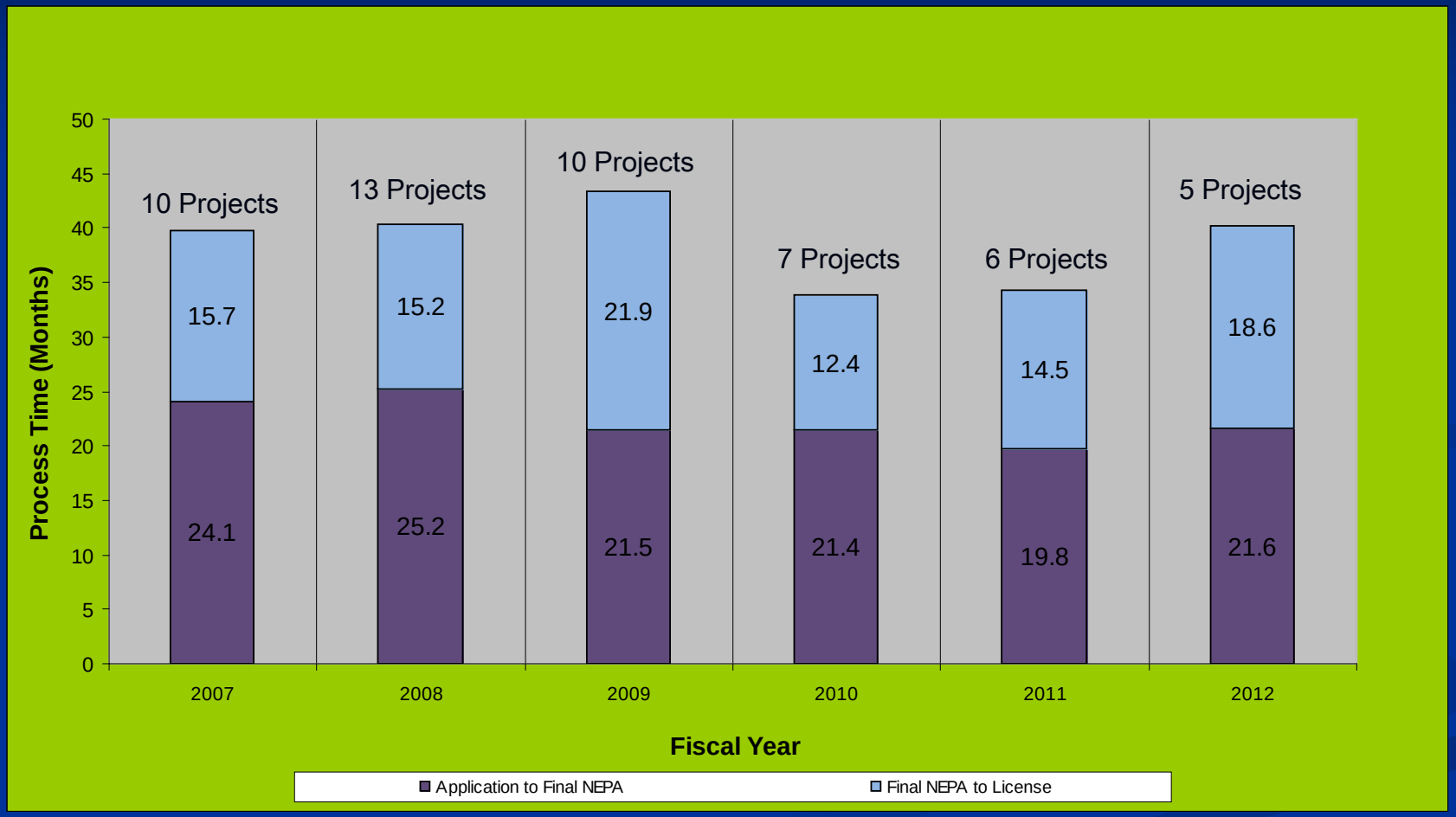
Licensing and Exemption Processing Times



Original License Processing Times



Relicense Processing Times



What Can Be Improved

- Work out study and information needs early
- Use pre-filing dispute resolution in TLP or ALP
- Describe project facilities and operation clearly
- Understand scope of FERC's jurisdiction
- Call with questions (property rights, exemption or license, etc.)

What FERC Can Do

- Do single environmental document (EA)
- Issue EA with order
- Shorten comment periods/combine notices
- Combine scoping and pre-filing consultation
- Grant appropriate waivers
- Hold webinar to educate agencies on small hydro
- Make small hydro website more user friendly

Wishful Thinking

- For projects at similar locations (e.g. Corps dams), agree on suite of studies
- Integrate Corps section 408 with FERC licensing
- Make hydro license application processing a resource agency priority
- Designate lead agency
- Set enforceable schedules

Thank You

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