



Overview of Small Hydro Comments Submitted to FERC (2/4/2010)

I. Introduction (p.1)

- Hydropower is primed for growth, with the potential to add 60,000 MW of capacity and create 700,000 new jobs in the next 15 years. Small hydro is a critical component.
- Greater efficiencies in the regulatory approval processes for new development and expansions to existing developments, particularly for small hydro, can be achieved without compromising environmental protection or public participation.
- NHA proposes changes in FERC regulations through a rulemaking proceeding to be completed expeditiously and changes in FERC policies and internal processes that can be implemented immediately.

II. FERC Regulatory Changes (p.5)

- Develop and implement a better coordination between the preliminary permit process and licensing process.
- Develop and implement a smarter and more efficient process for authorizing power generation at existing now-powered dams.
- Develop and implement a streamlined process for approval of “non-capacity” amendments and certain “capacity” amendments and enlarge the definition of “non-capacity” related amendment.
- Develop and implement an automatic approval process for unopposed exemption applications that meet certain specified criteria.
- Modify the definitions for conduit exemption to fulfill the potential of this area of development.
- Review additional potential regulatory changes that would assist small hydro development.

III. FERC Policy/Agency Process Improvements (p.10)

- Provide enhanced educational tools and increased outreach to developers and stakeholders to facilitate the regulatory process.
- Provide online application processes and monitoring capabilities for new permit, license and exemption proceedings.
- Provide online application and monitoring processes for amendments to licenses and exemptions.
- Provide clarification on definitions, increased flexibility and expedited processing for exemptions.
- Negotiate and implement revised MOUs with other agencies relating to the small hydro regulatory approval process.
- Establish a demonstration/pilot process for new small, low-head or conduit technologies.
- Review additional policy areas where improvements to the regulatory process would assist small hydro development.

IV. Changes in Process/Regulation by Other Agencies (p. 19)

- NHA recommends ways to spur development of hydropower at Bureau of Reclamation and Corps of Engineers facilities.

V. Conclusion (p. 20)