



The 5 Stages of PME Grief : Can it be avoided?

NHA Annual Conference
2009

DENIAL



- This isn't really what we agreed to.

ANGER



- Stupid Agency People!

BARGAINING



- I'm sure they would change the requirement if only we explained things more clearly.
- Or maybe we should get Congress involved.

DEPRESSION

- Oh, why did I ever agree to work in hydro?



ACCEPTANCE



- Let's get with it.
- Better file an extension request at FERC!



Tactic #1

Negotiate all details pre-application



Advantages

- Complies with FERC Guidance
- Minimizes post-license negotiations
- Allows better cost estimates to be developed
- Measures are more easily analyzed for related decisions, such as Biological Opinions
- May narrow scope of future NEPA



Disadvantages

- Very time consuming
- Risks overall settlement on concepts
- Limits future flexibility to adapt to changing circumstances



Tactic #2

Develop plans post license



Advantages

- May be necessary to achieve settlement within ILP timeframes
- Increases future flexibility
- Allows plans/measures to be influenced by results of ongoing studies/investigations
- Provides lots of work post license for consultants!



Disadvantages

- At odds with FERC guidance
- Budget estimates tend to be squishy
- Agency & licensee personnel may change
- Delays implementation of measures
- Requires more NEPA analysis post license



Conclusion



What would Elisabeth Kubler-Ross do?

- Follow FERC's guidance as much as possible.
- Provide realistic predictions about level of certainty.
- Realize that too much detail can work to your disadvantage.
- Accept the fact that some amount of negotiation and license amendment will be necessary.