



VIA Electronic Filing

March 3, 2020

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Hinckley (Gregory B. Jarvis) Hydroelectric Project, FERC No. 3211-009, Filing of Draft License Application for Comment; Request for Treatment of Exhibit F as Critical Energy/Electric Infrastructure Information; and Request for Waiver of Supporting Design Report under Exhibit F

Dear Secretary Bose:

The Power Authority of the State of New York (Power Authority) is relicensing the Hinckley (Gregory B. Jarvis) Hydroelectric Project (FERC No. 3211) (Project) using the Federal Energy Regulatory Commission's (Commission) Integrated Licensing Process (ILP). Pursuant to the Commission's ILP regulations, 18 C.F.R. § 5.16(c), the Power Authority hereby files its Draft License Application (DLA) that seeks a new license for the Project.

In accordance with 18 C.F.R. § 5.16(e), by filing this DLA with the Commission, the Power Authority is seeking comments on the DLA from Commission staff, federal and state resource agencies, Indian Tribes, and other licensing participants. The Commission's ILP regulations, 18 C.F.R. § 5.16(e), as well as the Commission's Revised Process Plan issued on December 12, 2017, require all comments on this DLA to be filed with the Commission by June 1, 2020.

The contents of this DLA were prepared in accordance with 18 C.F.R. §§ 5.18, 4.51, and 4.41, as applicable. The information contained in Exhibit F, the design drawings of the principal Project works, comprises Critical Energy/Electric Infrastructure Information (CEII) that is exempt from mandatory disclosure under the Freedom of Information Act. 5 U.S.C. § 552(b)(3); 16 U.S.C. § 824o-1(d); 18 C.F.R. § 388.113(c)(1). The information in Exhibit F contains detailed engineering drawings of key infrastructure of the Project. Accordingly, as required under 18 C.F.R. § 388.112(b), the Power Authority requests that the Commission treat Exhibit F as CEII. Also as required by the Commission's regulations, the information in Exhibit F has been marked as CEII and removed from the public version of the attached DLA pursuant to 18 C.F.R. § 388.112(b). Exhibit F is being filed with the Commission as a separate CEII electronic document, through the Commission's e-Filing system.

With regard to the Final License Application (FLA) for the relicensing of the Project, the Power Authority respectfully requests a waiver of the requirement that Exhibit F contain a Supporting Design Report (SDR) for the Project. See 18 C.F.R. § 4.51(g), 4.41(g)(3). The Project is already subject to FERC Part 12 Dam Safety regulations. As part of these requirements, the Power Authority submitted its Seventh Independent Consultant's Safety Inspection Report, including the Supporting Technical Information Document, to the Commission on January 2, 2019. All applicable dam safety related documentation is on file with the Commission's Division of Dam Safety and Inspections in the New York Regional Office. The Power Authority is not proposing any changes to the Project that would affect the stability analysis on file.

Finally, with regard to the Exhibit G maps included in this DLA, the Power Authority notes that the Commission's regulations require Project boundary information to be filed in a shapefile or similar format. See 18 C.F.R. § 4.51(h), 4.41(h). The Power Authority will submit the shapefile or similar format with the FLA.

If you have any questions regarding this filing, please direct them to the undersigned at (914) 287-3153 or cindy.brady@nypa.gov.

Sincerely,

A handwritten signature in black ink that reads "Cindy Brady". The signature is written in a cursive, flowing style.

Cindy Brady
Manager, Licensing