

**Guidance for Organizations Wishing to File Comments in Support  
of  
Humboldt, Mendocino, Sonoma and CalTrout’s  
Notice of Intent  
to  
Cause a Regional Entity to File a License Application  
with  
the Federal Energy Regulatory Commission  
Proposing a Potter Valley Project  
Based on a Two-Basin Solution**

As you know, earlier this year Pacific Gas and Electric Company (“PG&E”) withdrew its Notice of Intent (“NOI”) to file an application for a new license with the Federal Energy Regulatory Commission (“FERC” or “Commission”) covering the Potter Valley Project, FERC Project No. 77 (“Project”). FERC subsequently issued a request for new licensing proposals from third parties and set a deadline of July 1, 2019 for submitting a formal NOI to file a license application. Without a replacement entity willing to hold the license and to operate the Project with the goal of promoting a two-basin solution, the environment in both the East Branch of the Russian River and Eel River Basins are threatened with adverse impacts harmful to downstream wildlife and communities. Inspired by Congressman Jared Huffman’s Potter Valley Project Ad Hoc Committee, the County of Humboldt, California, the Mendocino County Inland Water and Power Commission, the Sonoma County Water Agency, and California Trout, Inc. stepped up to the challenge of filing an NOI with FERC to fill the void created by PG&E’s decision not to pursue a license. These entities would appreciate your support at FERC for the pre-application process they proposed in their NOI. The information below includes instructions for filing such comments with FERC and a sample letter format that you may choose to follow.

**Instructions**

If you choose to file your comments electronically, which FERC strongly encourages, please file all documents using the Commission’s eFiling system at <http://www.ferc.gov/docs-filing/efiling.asp>. Comments of up to 6,000 characters can be filed without prior registration, using the eComment system at <http://www.ferc.gov/docs-filing/ecomment.asp>. You must include your name and contact information at the end of your comments. For further assistance, please contact FERC Online Support at [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov). In lieu of electronic filing, commenters may send a paper copy to: Secretary, Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426. The first page of any filing should include docket number P-77-285.

**Sample Form of Letter to FERC**

The following pages provide of an example of a letter that can be sent to FERC. Please personalize the letter as appropriate. The form letter assumes the commenter will submit a hard copy to FERC, in which case we encourage using any applicable letterhead or logo if you are writing on behalf of an organization. If comments are filed electronically, a written signature is not required.

[INSERT DATE]

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

Reference: Potter Valley Project No. 77-285  
Comments in Support of NOI Parties June 28 Notice of Intent Filing

On behalf of [INSERT SUPPORTING ENTITY'S NAME HERE], I am writing to support the Mendocino County Inland Water and Power Commission (Mendocino County IWPC), Sonoma County Water Agency (Sonoma Water), California Trout, Inc. (CalTrout), and the County of Humboldt, California (together, NOI Parties) in their filing of a Notice of Intent (NOI) to file an application for new license for the Potter Valley Project, Federal Energy Regulatory Commission (FERC or Commission) Project No. 77 (Project) on June 28, 2019. The NOI Parties, as proxies for the new Regional Entity they will undertake to form, represent that the Regional Entity, once formed, will have an unequivocal intent to file an application for a new license for the Project, utilizing the Commission's Integrated Licensing Process.

[INSERT SUPPORTING ENTITY SPECIFIC HISTORY, INTEREST IN PROJECT AND PERSONALIZED SUPPORT HERE]

Our organization supports the licensing approach proposed by the NOI Parties. As the record in this proceeding indicates, the Potter Valley Project is an unusual project that calls for an innovative process in order to reach a satisfactory conclusion in the public interest. Among other things, the Project involves the diversion of water from the Eel River into the East Branch Russian River, thereby affecting not one but two watersheds. Further, the current licensee initially filed an NOI, then withdrew it, thereby greatly reducing the time available for an alternative licensee to prepare a license application in time for the Commission to issue a new license in an orderly and considered manner before the current license expires. The NOI Parties' proposal represents a sensible approach to licensing that maximizes the opportunity for a new project license that balances the diverse needs of all entities affected by the Project in a timely fashion.

Two years ago, U.S. Representative Jared Huffman convened stakeholders in a Potter Valley Project Ad Hoc Committee to enable dialogue among stakeholders to develop recommendations on the terms of any new license for the Project. The Huffman Committee has attracted a broad cross-section of the interests affected by Project and currently boasts over 25 members, including each of the entities comprising the NOI Parties. Members of the Ad Hoc Committee are committed to reaching a "Two-Basin Solution" with co-equal goals of improving fish passage and habitat on the Eel River sufficient to support recovery of naturally reproducing, self-sustaining and harvestable native anadromous fish populations including migratory access upstream and downstream at current project dam locations and minimizing or avoiding adverse impacts to water supply reliability, fisheries, water quality, and recreation in the Russian River and Eel River basins. The NOI Parties' are uniquely situated to work with the Ad Hoc Committee and to take proper account of [supporting entity]'s interests, as well as the legitimate interests of others, in seeking a new license for the Project.

[INSERT SUPPORTING ENTITY'S LOGO HERE]

We support the NOI Parties commitment to these principles as they develop the Feasibility Study that will ultimately define the details of the Project, and we urge the Commission to adopt the process set forth in the NOI with the aim of materially benefitting both basins.

Sincerely,

[SUPPORTING ENTITY SIGNATURE]  
[TITLE OF SUPPORTING ENTITY'S SIGNATURE]  
[SUPPORTING ENTITY]