



Solutions for the Future

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November 27, 2019

Secretary Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

- FILED ELECTRONICALLY -

RE: Third Six-Month Preliminary Permit Progress Report for the Nuyakuk Hydroelectric Project (Project No. 14873), June 1, 2019 – December 1, 2019

Dear Secretary Bose:

Nushagak Cooperative (Cooperative) hereby submits its third six-month progress report for the period of June 1, 2019 through December 1, 2019 for the proposed Nuyakuk Hydroelectric Project (Project).

Over the course of the third six-month period associated with their Preliminary Permit, there has been substantive progress. The Cooperative has continued to progress with respect the internal phases of schedule development, study planning and the associated resource and financial planning for this multi-year effort. In addition, the Cooperative filed its Notice of Intent (NOI) and Pre-Application Document (PAD) with FERC on October 8, 2019. The Governor of the State of Alaska also signed Senate Bill 91 into law during this period which allowed for the Project to be a compatible use to the Wood-Tikchick State Park assuming a set of environmental and temporal provisions are met.

In addition to all of the aforementioned progress, the Cooperative has continued its public outreach efforts to further inform the local public and relevant interest groups of their intent to move forward with formally assessing the feasibility of the Project. We held a Project “Kick-off Meeting” with interested stakeholders on November 18th in Anchorage. FERC will be conducting its Scoping Meeting on December 11, 2019 and the Cooperative is in the process of planning a collaborative study planning meeting early in 2020.

ACTIVITIES DURING THE REPORTING PERIOD (June 1, 2019 – December 1, 2019)

Regulatory

- Filing of the NOI/PAD with FERC.
- Revisions/additional information requests from FERC on the PAD addressed and filed.
- Held a collaborative kick-off meeting with interested stakeholders and FERC to generally inform everyone of conceptual layout and plan, progress, biological and engineering considerations and schedule for moving forward.

Natural Resources and Engineering Feasibility

- An aerial survey of the Project area was conducted.
- Internal planning and key natural resource study concepts were developed.
- Discussed initial conceptual natural resource study concepts with stakeholders at kick-off meeting. Also discussed potential key studies given the existing natural resource conditions in the Project area.

Design and Engineering

- An aerial survey of the Project area was conducted.
- Refinements to Project infrastructure and operational scenarios were made based upon additional analysis of existing hydrology and potential demand.
- A presentation was given at the kick-off meeting which outlined current planning efforts and the conceptual design and operational layout given the existing data currently in-hand prior to the engineering and natural resource study efforts to be conducted over the next 3 years.

Administrative

- Refined internal and external cost estimates related to all phases of the licensing process in advance of Cooperative annual budget planning and grant application timing.
- Refine the conceptual schedule for all primary milestones associated with the licensing of the Project over the next 5 years.
- Response to FERC questions and additional information requests associated with the PAD.

CONTINUING ACTIVITIES IN SUPPORT OF LICENSE APPLICATION DEVELOPMENT

Now that legislation is passed allowing for comprehensive studies inside of the State Park boundary and in anticipation of significant progress in 2020 and beyond, the Cooperative will intensify collaborative efforts with stakeholders and FERC and advance study planning and implementation efforts. Further itemized detail is provided below:

Stakeholder Outreach and Consultation

- Collaborative study planning meeting with stakeholders to discuss study options and develop plan for 2020-2022 in advance of filing the Proposed Study Plan (PSP).
- Hold stakeholder meetings/calls related to study need identification, planning and implementation efforts.
- Secure appropriate subconsultants to conduct requisite natural resource studies identified

after working collaboratively with stakeholders.

- Maintain comprehensive consultation record.

Regulatory

- Develop and file the PSP.
- Continue to develop collaborative relationships with stakeholders.
- Maintain and amplify integration with FERC related to Project development.

Natural Resources and Engineering Feasibility

- Participate in the FERC scoping meeting on December 11, 2019.
- Hold collaborative study planning meeting in advance of filing the PSP.
- Apply for and secure all requisite permits necessary to conduct natural resource and engineering feasibility studies in 2020 and 2021.
- Work with stakeholders to identify key areas of study and begin development of comprehensive study plan package for all requisite resource areas.
- Begin study plan development for the natural resources and engineering feasibility studies to be conducted 2020-2022.

Administrative

- Retain the services of necessary subcontractors to provide specialized natural resource study support.
- Provide consistent updates to the Cooperative's Board of Directors related to Project progress.
- Participation in the FERC scoping meeting on December 11, 2019.

Please feel free to contact me (907.842.5251 or barmstrong@nushagak.coop) with any questions regarding this filing.

Sincerely,



Bob Armstrong
Electric Operations Manager
Nushagak Cooperative