



Fulcrum, LLC

A Subsidiary of Enel Green Power North America, Inc.

100 Brickstone Square, Suite 300 – Andover, MA 01810 – USA
T +1 978 681 1900 – F +1 978 681 7727

Via eFiling

November 30, 2018

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

Re: Barber Dam Hydroelectric Project (FERC No. 4881);
Notice of Intent, Pre-Application Document, and Request to Use the Traditional Licensing
Process

Dear Secretary Bose:

This filing is submitted on behalf of Fulcrum, LLC, and Ada County, Idaho, co-licensees for the Barber Dam Project (the Project). Fulcrum, LLC, a subsidiary of Enel Green Power North America, Inc. (EGPNA), and Ada County, Idaho (herein, the Applicants or Licensees) are preparing to relicense the Barber Dam Hydroelectric Project (Project) with the Federal Energy Regulatory Commission (FERC or Commission). The Project (FERC No. 4881) is located on the Boise River in Ada County. The FERC license expires on November 30, 2023.

In accordance with the Commission's regulations, the Applicants hereby commence the relicensing process by filing its Notice of Intent (NOI) to file an application for subsequent license and Pre-Application Document (PAD) for the Project. Also, pursuant to Section 5.3 of the Commission's regulations, 18 CFR § 5.3, the Applicants are requesting approval to use the Traditional Licensing Process (TLP) for this Project.

In accordance with Section 5.6(a)(1) of the Commission's regulations, 18 CFR § 5.6(a)(1), the Applicants are simultaneously distributing electronic copies of the NOI, PAD, and request to use the TLP to relevant federal and state resource agencies, Indian tribes, non-governmental organizations, and other potentially interested parties, as set forth on the attached stakeholder distribution list. In addition, the Applicants are providing two courtesy paper copies of the NOI and PAD to Commission Staff in the Office of Energy Projects and Office of General Counsel – Energy Projects, as required by the Commission's filing guidelines. The Applicants have also published notice of this filing in the Idaho Statesman, which is in general circulation in the Project area. All materials related to this NOI and PAD are available for inspection at the Ada County Operations Department, located to the right of the entrance to the Ada County Courthouse, 200 W. Front Street, Boise, Idaho 83702 and on a relicensing website at www.mcmjac.com/barberdamrelicensing.

As required by 18 CFR § 5.3(d)(1), any comments regarding the request to use the TLP must be filed with the Commission within 30 days of this filing (by December 30, 2018) and must reference FERC Project No. 4881.

The Applicants understand that the Commission will publicly notice the filing of the NOI and PAD and will then issue a Notice of Commencement (NOC) no later than 60 days of the date of this filing. If the Commission's NOC approves the use of the TLP, the Applicants will hold a Joint Meeting and site visit at the Project between 30 to 60 days of the issuance of the Commission's NOC. The meeting and site visit

are likely to occur sometime in March 2019. Parties' written comments on the PAD and study requests must be filed with the Commission, with a copy to the Applicants, within 60 days of the Joint Meeting.

Some of the information presented in the PAD is Critical Energy Infrastructure Information (CEII) as defined by the Commission at 18 CFR § 388.113(c). Such information has been removed from the public version of the PAD. In accordance with the Commission's filing guidelines, all CEII is included in a separate volume (Volume 2) that has been clearly labeled as CEII. The Applicants respectfully request that this information be accorded treatment as CEII, as it consists of a detailed Project facility diagram and other information relating to the "production, generation, transportation, transmission, or distribution of energy" (18 CFR § 388.113(c)).

In accordance with Section 5.5(e) of the Commission's regulations, 18 CFR § 5.5(e), the Applicants request that the Commission authorize consultation with the Idaho State Historic Preservation Office, pursuant to Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, and the NHPA implementing regulations at 36 CFR Part 800.

In addition, the Applicants request that FERC designate them as its non-federal representative for the Project for the purpose of informational consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, pursuant to Section 7 of the Endangered Species Act (ESA) and the joint agency ESA implementing regulations at 50 CFR Part 402.

We look forward to working with Commission staff, resource agencies, members of the public, and other stakeholders toward developing a license application for this renewable energy facility. If there are any questions or comments regarding the NOI, PAD, or any information provided by the Applicants, please contact Kevin Webb, Hydro Licensing Manager at 978-935-6039 or by email at Kevin.Webb@enel.com.

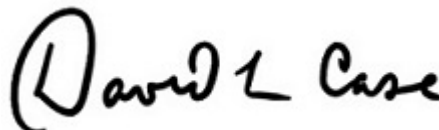
Sincerely,

Fulcrum, LLC



Conrad E. St. Pierre
Senior Director
Hydro Operations and Maintenance

Ada County, Idaho



David L. Case
Chairman of the Board
Ada County Board of Commissioners

cc: K. Webb, Fulcrum
C. Salo, Fulcrum
L. Jorgensen, Ada County
H. Wahto, McMillen Jacobs
Distribution List (see attached)

BARBER DAM HYDROELECTRIC PROJECT (FERC NO. 4881) DISTRIBUTION LIST

Licensees	
<p>Kevin Webb, Hydro Licensing Manager Enel Green Power North America, Inc. 100 Brickstone Square, Suite 300 Andover, MA 01810 978-935-6039 kevin.webb@enel.com</p>	<p>Conrad St. Pierre, Hydro O&M Senior Director Enel Green Power North America, Inc. 100 Brickstone Square, Suite 300 Andover, MA 01810 978-337-8939 conrad.stpierre@enel.com</p>
<p>Chuck Salo, Regional Manager, Hydro O&M Enel Green Power North America, Inc. 1755 E. Plumb Lane, Suite 155 Reno, NV 89502 978-447-3914 chuck.salo@enel.com</p>	<p>Lorna Jorgensen, Deputy Prosecuting Attorney Ada County Prosecutor's Office Civil Division 200 W. Front Street Boise, ID 83702 208-287-7700 ljorgensen@adaweb.net</p>
Federal	
<p>Kimberly Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE Washington, DC 20426</p>	<p>Douglas Johnson, Regional Engineer Federal Energy Regulatory Commission Portland Regional Office 805 SW Broadway, Fox Tower, Suite 550 Portland, OR 97205 503-552-2799 douglas.johnson@ferc.gov</p>
<p>Michael Morse, Branch Chief FERC/Hydro/CPA U.S. Fish & Wildlife Service, Pacific Region Idaho Fish and Wildlife Office 1387 S. Vinnell Way, Suite 368 Boise, ID 83709 208-378-5261 michael_morse@fws.gov</p>	<p>Christian N. Dietz, District Commander U.S. Army Corps of Engineers Northwest Division, Walla Walla District 201 N. 3rd Ave. Walla Walla, WA 99362 509-527-7020 cenww-pa@usace.army.mil</p>
<p>Christen Marve Griffith, Senior Project Manager U.S. Army Corps of Engineers Northwest Division, Walla Walla District Boise Regulatory Field Office 720 E. Park Blvd., Suite 245 Boise, ID 83712 208-433-4470 christen.m.griffith@usace.army.mil</p>	<p>Chris Hladick, Regional Administrator U.S. Environmental Protection Agency Region 10, Pacific Northwest 1200 6th Ave. Seattle, WA 98101 206-553-1234 hladick.christopher@epa.gov</p>

<p>Allison O'Brien, Regional Environmental Officer U.S. Department of the Interior Office of Environmental Policy & Compliance Pacific Northwest Region 620 SW Main Street, Suite 201 Portland, OR 97205 503-326-2489</p>	<p>Jim Case, Realty Specialist U.S. Forest Service Boise National Forest 1249 S. Vinnell Way, Suite 200 Boise, ID 83709 208-373-4144 jimcase@fs.fed.us</p>
<p>Makary Hutson, Natural Resource Specialist U.S. Forest Service Interregional Hydropower Team 1617 Cole Blvd, Bldg 17 Lakewood, CO 80401 303-275-5220 makaryhutson@usda.gov</p>	<p>Susan Carter, Chief Economist U.S. Department of Agriculture 12th & Jefferson Drive SW, Room 112 Washington, DC 20250 202-720-5447 scarter@oce.usda.gov</p>
<p>Peter Ditton, State Director (Acting) U.S. Bureau of Land Management Idaho State Office 1387 S. Vinnell Way Boise, ID 83709 208-373-4001 pditton@blm.gov</p>	<p>Lara Douglas, District Manager U.S. Bureau of Land Management Boise District Office 3948 Development Ave Boise, ID 83705 208-384-3300 ledouglas@blm.gov</p>
<p>J. Allen Tarter, Natural Resources Specialist U.S. Bureau of Land Management Four Rivers Field Office 3948 South Development Ave Boise, ID 83705 208-384-3300 jtarter@blm.gov</p>	<p>Florence Webster U.S. Bureau of Reclamation Pacific Northwest Regional Office 1150 North Curtis Road, Suite 100 Boise, ID 83706 208-378-5332 fwebster@usbr.gov</p>
<p>Daniel Largo, Superintendent U.S. Bureau of Indian Affairs Northern Idaho Agency PO Drawer 277 Lapwai, ID 83540 208-621-4831 daniel.largo@bia.gov</p>	<p>John M. Fowler, Executive Director Advisory Council on Historic Preservation 401 F Street NW, Suite 308 Washington, DC 20001 202-517-0200 jfowler@achp.gov</p>
<p>Kyle Blasch, Center Director U.S. Geological Survey Idaho Water Science Center 230 Collins Road Boise, ID 38702 208-387-1321 kblasch@usgs.gov</p>	<p>David Evetts, Assistant Director for Hydrologic Data U.S. Geological Survey Idaho Water Science Center 230 Collins Road Boise, ID 38702 208-387-1316 devetts@usgs.gov</p>

<p>Elliot Mainzer, Administrator Bonneville Power Administration PO Box 3621 Portland, OR 97208 503-230-3000 eemainzer@bpa.gov</p>	<p>Honorable James E. Risch U.S. Senate 483 Russell Senate Office Building Washington, DC 20510 202-224-2752</p>
<p>Honorable Mike Crapo U.S. Senate 239 Dirksen Senate Building Washington, DC 20510 202-224-6142</p>	<p>Honorable Mike Simpson U.S. House of Representatives 2084 Rayburn House Office Building Washington, DC 20515 202-225-5531</p>
State	
<p>Bill Bosworth, Environmental Staff Biologist Idaho Department of Fish & Game Southwest Region 3101 South Powerline Road Nampa, ID 83686 208-465-8465 bill.bosworth@idfg.idaho.gov</p>	<p>Joe Kozfkay, Southwest Regional Fisheries Manager Idaho Department of Fish & Game Southwest Region 3101 South Powerline Road Nampa, ID 83686 208-465-8465 joe.kozfkay@idfg.idaho.gov</p>
<p>John Cassinelli, Southwest Regional Fisheries Biologist Idaho Department of Fish & Game Southwest Region 3101 South Powerline Road Nampa, ID 83686 208-465-8465 john.cassinelli@idfg.idaho.gov</p>	<p>David Groeschl, Acting Director Idaho Department of Lands 300 N. 6th Street, Suite 103 Boise, ID 83702 208-769-1525 dgroeschl@idl.idaho.gov</p>
<p>Cynthia Bridge Clarke, Water Projects Section Manager Idaho Department of Water Resources 322 E. Front Street Boise, ID 83720 208-287-4817 cynthia.clark@idwr.idaho.gov</p>	<p>John Falk, Dam Safety Program Manager Idaho Department of Water Resources State Dam Safety Office 322 E. Front Street Boise, ID 83720 208-287-4927 john.falk@idwr.idaho.gov</p>
<p>Rex R. Barrie, Boise River Watermaster State of Idaho Water District No. 63 PO Box 767 Star, ID 83669 208-908-5480 waterdistrict63@qwestoffice.net</p>	<p>Norman Wright, Chairman Idaho Soil and Water Conservation Commission 322 E. Front Street, Suite 560 Boise, ID 83702 208-332-1790 norman.wright@swc.idaho.gov</p>

<p>Michael Ratchford, State Geologist Idaho Geological Survey University of Idaho 875 W. Perimeter Dr. MS3014 Moscow, ID 83844 208-885-7993 edratchford@uidaho.edu</p>	<p>Lance Holloway, Water Quality Manager Idaho Department of Environmental Quality Boise Regional Office 1445 N. Orchard Street Boise, ID 83706 208-373-0550 lance.holloway@deq.idaho.gov</p>
<p>Mark Chicchini-Beaver, Deputy Attorney General Idaho Department of Environmental Quality Attorney Generals Office 1410 N. Hilton Street Boise, ID 83706 208-373-0543 mark.cecchini-beaver@deq.idaho.gov</p>	<p>Tricia Canaday, Deputy SHPO/Interim SHPO Administrator Idaho State Historical Society State Historic Preservation Office 210 W. Main Street Boise, ID 83702 208-488-7462 tricia.canaday@ishs.idaho.gov</p>
<p>Anna Borchers Canning, Management Services Administrator Idaho Department of Parks & Recreation 5657 Warm Springs Ave. Boise, ID 83716 208-514-2252 anna.canning@idpr.idaho.gov</p>	<p>Adam Zaragoza, Development Bureau Chief Idaho Department of Parks & Recreation 5657 Warm Springs Ave. Boise, ID 83716 208-514-2456 adam.zaragoza@idpr.idaho.gov</p>
<p>Idaho Office of the Governor State Capitol PO Box 83720 Boise, ID 83720 208-334-2100 governor@gov.idaho.gov</p>	<p>Idaho Office of the Attorney General 700 W. Jefferson Street, Suite 210 Boise, ID 83720 208-334-2400</p>
<p>Diane Hanian, Commission Secretary Idaho Public Utilities Commission 472 W. Washington Street Boise, ID 83702 208-334-0338 diane.holt@puc.idaho.gov</p>	<p>Senator Janie Ward-Engelking Idaho Senate District 18 3578 S. Crosspoint Ave. Boise, ID 83706 208-385-9564 jwardengelking@senate.idaho.gov</p>
<p>Senator Chuck Winder, Majority Leader Idaho Senate District 20 5528 N. Ebbetts Ave. Boise, ID 83713 208-853-9090 cwinder@senate.idaho.gov</p>	<p>Senator Fred S. Martin Idaho Senate District 15 3672 Tubleweed Place Boise, ID 83713 208-447-9000 fmartin@senate.idaho.gov</p>

<p>Representative Phyllis K. King Idaho House of Representatives District 18 2107 Palouse Street Boise, ID 83705 208-344-0202 pking@house.idaho.gov</p>	<p>Representative Ilana Rubel, Assistant Minority Leader Idaho House of Representatives District 18 2750 Migratory Drive Boise, ID 83706 208-866-4776 irubel@house.idaho.gov</p>
<p>Representative Mike Moyle, Majority Leader Idaho House of Representatives District 14 480 N. Plummer Road Star, ID 83669 mmoyle@house.idaho.gov</p>	<p>Representative Thomas Dayley Idaho House of Representatives District 21 4892 S. Willandra Way Boise, ID 83709 208-562-0276 tdayley@house.idaho.gov</p>
Local	
<p>John Roldan, Strategic Water Resources Manager City of Boise, Public Works Department 150 N. Capitol Blvd, 4th Floor Boise, ID 83702 208-608-7551 jroldan@cityofboise.org</p>	<p>Haley Falconer, Environmental Division Senior Manager City of Boise, Public Works Department 150 N. Capitol Blvd, 4th Floor Boise, ID 83702 208-608-3338 hfalconer@cityofboise.org</p>
<p>Jim Pardy, City Engineer City of Boise, Public Works Department 150 N. Capitol Blvd, 2nd Floor Boise, ID 83702 208-608-7150 jpardy@cityofboise.org</p>	<p>Kate Harris, Water Quality Programs Manager City of Boise, Public Works Department 150 N. Capitol Blvd, 4th Floor Boise, ID 83702 208-608-3338 kharris@cityofboise.org</p>
<p>Abigail Germaine, Deputy City Attorney City of Boise, Attorney's Office 150 N. Capitol Blvd, 4th Floor Boise, ID 83702 208-608-7956 agermaine@cityofboise.org</p>	<p>Steve Burgos, Director City of Boise, Public Works Department 150 N. Capitol Blvd, 4th Floor Boise, ID 83702 208-608-3338 sburgos@cityofboise.org</p>
<p>Doug Holloway, Director City of Boise, Parks and Recreation Office 1104 Royal Blvd Boise, ID 83706 208-608-7600 bpr@cityofboise.org</p>	<p>City of Nampa 411 3rd Street S Nampa, ID 83651 208-468-4413 bishopd@cityofnampa.us</p>

<p>City of Eagle 660 E. Civic Lane Eagle, ID 83616 208-939-6813 eaglecity@cityofeagle.org</p>	<p>City of Meridian 33 E. Broadway Ave., Suite 104 Meridian, ID 83642 208-888-4433 cityclerk@meridiancity.org</p>
<p>City of Kuna PO Box 13 Kuna, ID 83634 208-387-7726 cengels@kunaid.gov</p>	<p>City of Garden City 6015 N. Glenwood Street Garden City, ID 83714 208-472-2900 lleiby@gardencityidaho.org</p>
<p>New York Irrigation District 6616 W. Overland Road Boise, ID 83709</p>	<p>Boise-Kuna Irrigation District 129 North School St. Kuna, ID 83634</p>
<p>Boise Project Board of Control 2465 Overland Road Boise, ID 83705</p>	<p>Ada County Highway District 3775 Adams Street Garden City, ID 83714</p>
Tribal	
<p>Rachel Edwards, Assistant to Executive Committee Nez Perce Tribe PO Box 305 Lapwai, ID 83540 208-621-3685 nptec@nezperce.org</p>	<p>Nez Perce Water Resource Development PO Box 365 Lapwai, ID 83540</p>
<p>Nathan Small, Chairman Fort Hall Business Council PO Box 306 Fort Hall, ID 83203 208-478-3700 publicaffairs@sbtribes.com</p>	
Other	
<p>Northwest Power and Conservation Council 851 SW Sixth Ave., Suite 1100 Portland, OR 97204 503-222-5161 info@nwcouncil.org</p>	<p>Kevin Lewis, Executive Director Idaho Rivers United PO Box 633 Boise, ID 83701 208-343-7481 kevin@idahorivers.org</p>

<p>Marie Callaway Kellner, Water Associate Idaho Conservation League PO Box 844 Boise, ID 83701 208-345-6933 ext. 32 mkellner@idahoconservation.org</p>	<p>Mark Hofflund, Managing Director Idaho Shakespeare Festival PO Box 9365 Boise, ID 83707 208-429-9908 ext. 202 mark@idahoshakespeare.org</p>
<p>Jan Johns, Executive Director Idaho Foundation for Parks and Lands 5657 Warm Springs Ave. Boise, ID 83716 208-860-0311 jan@idaholands.org</p>	<p>Sharon Hubler, Chair Barber Pool Conservation Area Committee 206 E. Linden Street Caldwell, ID 83605 208-859-9529 sharon@idaholands.org</p>
<p>Ryan Jones Sentry Management 6149 N. Meeker Place, Suite 150 Boise, ID 83713 208-323-1080 ext. 59504 rjones@sentrymgt.com</p>	<p>Boise Valley Irrigation Ditch Co. 8750 N. Bogart Ln Boise, ID 83714</p>
<p>Andrew J. Waldera Sawtooth Law 1101 W. River Street, Suite 110 Boise, ID 83702 208-629-7447 andy@sawtoothlaw.com</p>	<p>S. Bryce Farris Sawtooth Law 1101 W. River Street, Suite 110 Boise, ID 83702 208-629-7447 bryce@sawtoothlaw.com</p>
<p>Andy Brunelle, Treasurer Ted Trueblood Chapter of Trout Unlimited PO Box 1971 Boise, ID 83701 208-334-1770 boisetrou@aol.com</p>	<p>Darryl Khurt, President Ted Trueblood Chapter of Trout Unlimited PO Box 1971 Boise, ID 83701 208-870-6628 darryl.khurt@gmail.com</p>
<p>Chris Jones, Board Member Ted Trueblood Chapter of Trout Unlimited PO Box 1971 Boise, ID 83701 208-344-0284 jpaul7@q.com</p>	<p>Kira Finkler, Director Trout Unlimited Idaho Water Project 910 W. Main Street, Suite 342 Boise, ID 83702 208-345-9800 kfinkler@tu.org</p>
<p>Peter Anderson, Counsel Trout Unlimited Idaho Water Project 910 W. Main Street, Suite 342 Boise, ID 83702 208-345-9800 panderson@tu.org</p>	<p>Doug Fowler, President and CEO LeNir Ltd. 4940 E. Mill Station Drive Boise, ID 83716 208-344-1131 sarahb@lenirltd.com</p>

<p>Riverstone International School 5521 Warm Springs Ave. Boise, ID 83716 208-424-5000 mrose@riverstoneschool.org</p>	<p>The Terraces of Boise 5301 E. Warm Springs Ave. Boise, ID 83716 208-336-5550</p>
<p>Christy Meyer, Idaho Conservation Manager The Freshwater Trust 910 Main Street, Suite 258 Boise, ID 83702 208-321-8116 christy@thefreshwatertrust.org</p>	<p>Tim Breuer, Executive Director Land Trust of Treasure Valley 708 W. Franklin Street Boise, ID 83702 208-345-1452 tbreuer@littv.org</p>
<p>Liz Paul Boise River Enhancement Network, INC PO Box 9402 Boise, ID 83707 208-570-3013 info@boiseriverenhancement.org</p>	<p>William Gigray, President Foundation for Ada/Canyon Trail Systems 5700 E. Franklin Road, Suite 200 Nampa, ID 83687 secretary@factsidaho.org</p>
<p>Jane Kreller, Communications Manager SUEZ Idaho Operations 8248 W. Victory Road Boise, ID 83709 208-362-7336 jane.kreller@suez.com</p>	<p>Clint Dolsby, Chair Lower Boise Watershed Council lbwcexecutivedirector@gmail.com</p>

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served, by U.S. First Class Mail or by electronic mail, the Notice of Intent to File Application for a Subsequent License upon all interested parties designated on the attached distribution list for the Barber Dam Project, FERC Project No. 4881, in accordance with Rule 2010 of the Rules of Practice and Procedure, 18 CFR § 385.2010.

November 29, 2018



Mr. Kevin M. Webb
Hydro Licensing Manager
Fulcrum, LLC
100 Brickstone Square, Suite 300
Andover, MA 01810

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

FULCRUM, LLC
ADA COUNTY, IDAHO

PROJECT NO. 4881

**NOTICE OF INTENT
TO FILE APPLICATION FOR SUBSEQUENT LICENSE**

Pursuant to 18 CFR § 5.5, Fulcrum, LLC a subsidiary of Enel Green Power North America, Inc. and Ada County, Idaho (the Applicants or Licensees) hereby notify the Federal Energy Regulatory Commission of their intention to file an Application for a Subsequent License for the Barber Dam Hydroelectric Project, FERC No. 4881. The following information is provided consistent with the requirements of 18 CFR § 5.5(b).

(1) Licensees' Name and Address

Fulcrum, LLC
100 Brickstone Square, Suite 300
Andover, MA 01810

Ada County, Idaho
200 W. Front Street
Boise, ID 83702

(2) FERC Project Number

P-4881

(3) License Expiration Date

November 30, 2023

(4) Statement of Intent

The Applicants intend to file an Application for Subsequent License for the Barber Dam Project utilizing the Commission's Traditional Licensing Process (TLP) on or before November 30, 2021. The request and a justification to use the TLP is being filed with the Commission concurrently with this Notice of Intent (NOI).

(5) Type of Principal Project Works to be Licensed

The Project consists of an 1,100-foot-long, earthen embankment dam, a 400-foot-long, concrete-capped timber crib spillway, a 75-acre impoundment with negligible storage capacity, two bulkhead gate-type intakes, two trash racks and a trash sluiceway, a powerhouse containing two generating units, a 100-foot-long concrete tailrace, and 60 feet of underground transmission (generator leads).

(6) Location of Project

State: Idaho
County: Ada County
Nearby City: Boise
Waterway: Boise River

(7) Installed Plant Capacity

The following table provides the nameplate rating information for the project's two units.

Capacity	Unit 1	Unit 2	PROJECT
Turbine Capacity	2082 kW	2082 kW	
Generator Capacity	1850 kW	1850 kW	
Unit Capacity	1850 kW	1850 kW	3700 kW
Hydraulic Capacity	1077 cfs	1077 cfs	2154 cfs

(8) The names and mailing address of

(i) Every county in which any part of the project is located, and in which any Federal facility that is used or to be used by the project is located

Ada County
200 W. Front Street
Boise, ID 83702

The project does not occupy or use any Federal facilities.

(ii) Every city, town, or similar political subdivision

(A) In which any part of the project is or is to be located and any Federal facility that is or is to be used by the project is located, or

City of Boise
PO Box 500
Boise, ID 83701

(B) That has a population of 5,000 or more people and is located within 15 miles of the existing or proposed project dam

City of Boise
PO Box 500
Boise, ID 83701

City of Garden City
6015 N. Glenwood Street
Garden City, ID 83714

City of Eagle
PO Box 1520
Eagle, ID 83616

City of Meridian
33 E. Broadway Ave., Suite 104
Meridian, ID 83642

City of Kuna
PO Box 13
Kuna, ID 83634

(iii) Every irrigation district, drainage district or similar special purpose political subdivision

(A) In which any part of the project is or is proposed to be located and any Federal facility that is or is proposed to be used by the project is located

New York Irrigation District
6616 W Overland Rd
Boise, ID 83709

Boise Project Board of Control
2465 Overland Rd
Boise, ID 83705

(B) That owns, operates, maintains, or uses any project facility or any Federal facility that is or is proposed to be used by the project

No irrigation districts, drainage districts, or similar special purpose political subdivisions own, operate, maintain, or use any project facilities. The Project does not occupy or use any Federal facilities.

(iv) Every other political subdivision in the general area of the project that there is reason to believe would be likely to be interested in, or affected by, this notification

Ada County Highway District
3775 Adams Street
Garden City, ID 83714

(v) Affected Indian Tribes

Nez Perce Tribe
PO Box 305
Lapwai, ID 83540

Fort Hall Business Council
PO Box 306
Fort Hall, ID 83203

BARBER DAM PROJECT FERC PROJECT NO. P-4881 REQUEST TO USE THE TRADITIONAL LICENSING PROCESS

Ada County, Idaho along with Fulcrum, LLC, a subsidiary of Enel Green Power North America, Inc. (EGNPA), are co-licensees (herein, “the Applicants” or “Licensees”) of the Barber Dam Project (Project). The Applicants are including in this filing a request to use the Federal Energy Regulatory Commission’s (FERC or Commission) Traditional Licensing Process (TLP) for the Project. Justification for this request, as required by 18 CFR § 5.3 is provided below. Any comments on the Applicants’ request to use the TLP must be filed with the Commission within 30 days of the filing date of this request.

Likelihood of Timely License Issuance (18 CFR § 5.3(c)(1)(ii)(A))

By definition, the default Integrated Licensing Process (ILP) is an intensive, front-loaded process that involves scoping under the National Environmental Policy Act (NEPA), study plan development, dispute resolution, study plan implementation, and application development. The Applicants believe that with early coordination and consultation with the various resource agencies and stakeholders, the more flexible TLP would allow the Applicants to complete pre-filing requirements and ultimately file the subsequent license application in a timely manner. Many agencies and stakeholders that are participating in the relicensing to date have been involved in relicensing proceedings with other hydroelectric projects and have experience with the TLP. Through outreach during the development of the Pre-Application Document (PAD), the Applicants, agencies and other stakeholders have already begun discussions regarding issues related to the relicensing, and are already aware of the limited issues that are likely to be raised at the Project. The stakeholders’ familiarity with the TLP and associated informational needs should allow for a timely issuance of the Project license on or before the expiration date of the existing license.

Complexity of the Resource Issues (18 CFR § 5.3(c)(1)(ii)(B)) and Level of Anticipated Controversy (18 CFR § 5.3(c)(1)(ii)(C))

The Project, as currently licensed, operates in a run-of-river mode using a conventional hydro design and has since 1988. Additionally, the impoundment has existed since 1905, with well-known and well-understood impacts. The Project is small (3,700 kilowatts) and involves no new diversion in discharge/flow releases; there would be no changes to existing impoundment levels; no Indian tribes or marine or diadromous fisheries would be impacted; and it involves no critical habitat for federally threatened and endangered species.

Due to the limited geographic scope of the potential Project impacts, a relatively straightforward relicensing process is envisioned to generate the needed information to support the development of the license application. A complete list of identified resource issues and how these would be addressed in the study program is included in Section 5 of the PAD. Consistent with previous relicensing efforts, the Applicants believe that any additional remaining resource issues will be identified through the Joint Agency Public Meetings, and through the subsequent consultation activities.

As noted above, the Applicants have initiated informal consultation and outreach with the agencies and stakeholders to gain existing information about Project resources, and to consider resource issues and management goals that will need to be considered during the process.

Given the issues already identified at the project, it is not currently anticipated that the relicensing process will result in any significant controversy that cannot be resolved within the TLP. The flexibility provided by the TLP better facilitates the necessary collaborative process that will need to occur between and among the resource agencies, interested parties, and the Applicants to address these issues during the licensing process.

Relative Cost of the Traditional Licensing Process Compared to the Integrated Licensing Process (18 CFR § 5.3(c)(1)(ii)(D))

In general, the Applicant believes that the TLP is a more efficient process for this Project, which is characterized by its relatively small size and current and proposed run-of-river operation. Given the limited geographic scope of Project effects, the limited number of anticipated issues, and the low level of controversy, the Applicant believes that the TLP is better suited to the Project from a cost standpoint than is the ILP. The Applicant is confident that under the TLP, it will provide FERC with a Final License Application at less cost and in less time than required by the regimented nature of the ILP.

Additionally, the timelines and more flexible nature of the TLP will provide the Applicants, agencies, and other stakeholders more flexibility to schedule meetings and develop pre-filing documentation. This flexibility will better allow for all the relicensing parties to perform such activities in coordination with other day-to-day activities. Such flexibility will help reduce the overall burden of the relicensing effort for both the Applicant and stakeholders.

Amount of Available Information and Potential for Significant Disputes over Studies (18 CFR §5.3(c)(1)(ii)(E))

Based on preparation of the PAD and consultation to date, there is a reasonable amount of available information regarding resources associated with the Project. The Applicants distributed a PAD questionnaire to numerous stakeholders in Idaho to seek resource information for development of the PAD including fisheries, recreation and cultural data. It is the Applicants' intent to conduct its pre-filing consultation in a collaborative manner that addresses and resolves, to the extent possible, any differences of opinion regarding the design and implementation of any necessary studies. Due to the relatively small geographic area of Project impacts, needed field information can be collected in a relatively short amount of time. Given the productive exchange of data to date and the collective understanding of the relative scope of potential impacts that need to be studied, the Applicants do not anticipate significant disputes over any necessary studies.

Other Pertinent Factors (18 CFR § 5.3(c)(1)(ii)(F))

In conclusion, the Applicants believe that for this relatively small straightforward Project, the TLP will provide the most efficient, effective, and least burdensome process for relicensing the Project. The Applicants appreciate the Commission's consideration of this request and believes that this justification provided herein shows good cause for the Commission to grant this request.