



January 29, 2021

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

Re: Premium Energy Holdings' First Amendment for Preliminary Permit

for the Ashokan Pumped Storage Project, FERC Project No. 15056-

000

Dear Secretary Bose:

Pursuant to 18 C.F.R. §§ 4.32 and 4.81 of the Federal Energy Regulatory Commission's ("FERC") regulations, enclosed for filing is Premium Energy Holdings, LLC's ("Premium Energy") Amendment to Application for Preliminary Permit for the Ashokan Pumped Storage Project under P-15056-000. This amendment reflects the following changes:

- (1) The contact information of towns located within 15 miles of the project dam, now considers Town of Woodstock, Town of Ulster, and Town of Saugerties.
- (2) Contact information of Indian tribes that may be affected by the project, now considers Delaware Nation, Delaware Tribe of Indians, Saint Regis Mohawk Tribe, and Stockbridge Munsee Community.
- (3) Information about nominal rating of the pump-turbine generator-motor, and about the spillway of the reservoirs (Exhibit 1).
- (4) New series of maps for the project layout (Exhibit 3).

The required amendment in the application is requested to avoid the potential land use conflict and engineering design liabilities. If you have any questions or require additional information regarding this submittal, please contact me at (909) 595-5314 or email me at victor.rojas@pehllc.net.

Sincerely,

Victor M. Rojas

Managing Director at Premium Energy Holdings, LLC

Enclosures

cc:

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

APPLICATION FOR PRELIMINARY PERMIT FOR THE ASHOKAN PUMPED STORAGE PROJECT

FERC Project No. 15056-000

Prepared by

Premium Energy Holdings, LLC

January 29, 2021

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INITIAL STATEMENT

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Application for Preliminary Permit

for the Ashokan Pumped Storage Project

Premium Energy Holdings, LLC ("Premium Energy"), a California based limited liability corporation, applies to the Federal Energy Regulatory Commission for a preliminary permit for the Ashokan Pumped Storage Project, as described in the attached exhibits. This application is made in order that the applicant may secure and maintain priority of application for a license for the project under Part I of the Federal Power Act while obtaining the data and performing the acts required to determine the feasibility of the project and to support an application for a license.

1. The location of the proposed project is:

State or territory: New York
Counties: Ulster County

Township or nearby town: Shokan City, West Hurley City Streams: Esopus Creek, Bush Kill Creek

2. The exact name, business address, and telephone number of the applicant are:

Premium Energy Holdings, LLC 355 South Lemon Ave, Suite A Walnut, CA 91789

Telephone: (909) 595-5314

3. The name, business address, and telephone number of the persons authorized to act as agent for the applicant in this application are:

Victor M. Rojas

Managing Director at Premium Energy Holdings, LLC

355 South Lemon Ave, Suite A

Walnut, CA 91789

Telephone: (909) 595-5314 Email: victor.rojas@pehllc.net

Maria Hernandez

Project Manager at Premium Energy Holdings, LLC

355 South Lemon Ave, Suite A

Walnut, CA 91789

Telephone: (909) 595-5314

Email: maria.hernandez@pehllc.net

- 4. Preference under Section 7(a) of the Federal Power Act
- 5. Premium Energy is a corporation based in California and is not claiming preference under section 7(a) of the Federal Power Act. Premium Energy's business primarily involves the retrofit and modernization of pumping plants, transmission planning and design, power system studies, testing and commissioning of power plants and substations.

6. Term of Permit:

The proposed term of the requested permit is twenty-four (24) months.

7. Existing Dams or Other Project Facilities:

The proposed project would make use of the existing Ashokan reservoir water and existing dam. The Ashokan Pumped Storage Project would use the existing Ashokan reservoir as a lower pool and proposes a new upper reservoir in the Catskill Mountains to serve as upper pool. The filling of these reservoirs would be done through the Esopus Creek and the existing Ashokan Reservoir.

ADDITIONAL INFORMATION REQUIRED BY 18 C.F.R. § 4.32(a)

1. Identification of persons, associations, domestic corporations, municipalities, or state that has or intends to obtain and will maintain any proprietary right necessary to construct, operate, or maintain the project:

> Premium Energy Holdings, LLC 355 South Lemon Ave, Suite A Walnut, CA 91789

Telephone: (909) 595-5314

- 2. Identify (names and mailing addresses):
 - i. Every county in which any part of the project, and any Federal facilities that would be used by the project, would be located.

Ulster County Government 244 Fair Street, PO Box 1800 Kingston, NY 12402 Telephone: (845) 340-3000

- ii. Every city, town or similar local political subdivision:
 - (A) In which any part of the project, and any Federal facilities that would be used by the project, would be located:

West Shokan Town 45 Watson Hollow Rd West Shokan, NY 12494 Telephone: (845) 657-8118

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

Shokan City 50 Bostock Rd Shokan, NY 12481

Telephone: (845) 657-2912

Olivebridge Town Beaverkill Rd Olivebridge, NY 12461 Telephone: (845) 657-8177

Woodstock Town NY 212 Woodstock, NY 12498 Telephone: (845) 679-2113 Ulster Town 1 Town Hall Rd Lake Katrine, NY 12449 Telephone: (845) 382-2455

Saugerties Town 4 High Street Saugerties, NY 12477 Telephone: (845) 246-2321

- iii. Every irrigation district, drainage district, or similar special purpose political subdivision:
 - (A) In which any part of the project, and any Federal facilities that would be used by the project, would be located:

Ulster County Soil and Water Conservation District 3130 State Route 28, PO Box 667 Shokan, NY 12481

Telephone: (845) 688-3130

(B) That owns, operates, maintains, or uses any project facilities or any Federal facilities that would be used by the project:

New York State Office of Parks, Recreation and Historic Preservation 625 Broadway Albany, NY 12238

Telephone: (518) 474-0456

New York City Department of Environmental Protection 59-17 Junction Blvd Flushing, NY 11368 Telephone: (718) 595-7000

New York Department of Environmental Conservation 625 Broadway Albany, NY 12233

Telephone: (518) 402-8044

Every other political subdivision in the general area of the project that there is iv. reason to believe would likely be interested in, or affected by, the application, and interest:

> National Park Services 519 Albany Post Rd Hyde Park, NY 12538 Telephone: (845) 229-2501

Ridgeline Forest Services 402 Krumville Rd, Olviebridge, NY 12461 Telephone: (845) 657-7125

v. All Indian tribes that may be affected by the project:

Delaware Nation 31064 State Highway 281 Building 100 Anadarko, OK 73005 Telephone: (405) 247-2448

Delaware Tribe of Indians 5100 Tuxedo Blvd Bartlesville, OK 74006 Telephone: (918) 337-6591

Saint Regis Mohawk Tribe 412 State Route 37 Akwesasne, NY 13655 Telephone: (518) 358-3203

Stockbridge Munsee Community 65 1st Street Troy, NY 12180 Telephone: (715) 793-4836

VERIFICATION STATEMENT

This application for a preliminary permit for the proposed Ashokan Pumped Storage Project is executed in the state of California, county of Los Angeles.

By: Victor M. Rojas
Premium Energy Holdings, LLC
355 South Lemon Ave, Suite A
Walnut, CA 91789

Being duly sworn, deposes, and says that the contents of this application for a preliminary permit are true to the best of his knowledge or belief. The undersigned applicant has signed the application on this 18th day of November of 2020.

Victor M. Rojas

Managing Director at Premium Energy Holdings, LLC

Subscribed and sworn before me, a Notary Public of the State of California, County of Los Angeles, this day of *January 29th*, 2021.

NOTARY PUBLIC

EXHIBIT 1 – DESCRIPTION OF THE PROPOSED PROJECT

1. GENERAL CONFIGURATION

The proposed Ashokan Pumped Storage Project would be located 14 miles west of the City of Kingston in the Ulster County, NY. The project concept envisions the construction of a pumped storage power plant facility with a rated capacity of 800 MW. The Project proposes to use the existing Ashokan Reservoir as a lower pool and a new reservoir in the Catskill Mountains to serve as the upper pool.

The proposed Ashokan Pumped Storage Project would operate in a closed loop. Aside from evaporation and percolation losses, the project's water would stay within the system. Therefore, the existing Ashokan Reservoir's remaining water storage would not be used for project operation.

The existing Ashokan Reservoir is one of two reservoirs in New York City's Catskill Water Supply System, which was created in 1915 (105 years of age). The Ashokan Reservoir is conformed of earthen dams that are 213 ft high and total 5.5 miles in length. The Ashokan reservoir is comprised of two watersheds, the west basin receives water from Esopus Creek, and then the flow continues into the east basin through a concrete spillway, to supply water to New York City.

Alternatives for an upper reservoir to operate the Ashokan Pumped Storage Power Plant would require the construction of a new embankment to create a new reservoir in the Catskill Mountains, north or northwest of the Ashokan Reservoir. The new upper reservoir alternatives are listed below and are depicted in Exhibit 3.

- Upper Reservoir Alternative 1: A new Stony Clove Reservoir at 1,500 ft el.
- Upper Reservoir Alternative 2: A new Woodland Reservoir at 1,210 ft el.
- Upper Reservoir Alternative 3: A new Wittenberg Reservoir at 1,180 ft el.

The embankments for the proposed upper reservoir alternatives would consist of roller compacted concrete dams. Conceptual dimensions for the project's dams are detailed in table 1. Aside from the construction of the new embankment for the selected upper reservoir alternative, hydro power penstock and pressure tunnels will be required to connect the upper and lower reservoirs to the powerhouse. The tunnel system dimensions for each alternative are detailed in tables 2 through 4.

Table 1. New Reservoirs' Embankment Dimensions

Description	Proposed Reservoir	Dam Crest Elev. [ft]	Dam Height [ft]	Dam Length at Crest [ft]	Composition
	Stony Clove Reservoir	1,510	212	2,618	Waterproof roller compacted concrete
Upper Reservoir	Woodland Reservoir	1,220	232	2,736	Waterproof roller compacted concrete
	Wittenberg Reservoir	1,190	304	2,527	Waterproof roller compacted concrete

Table 2. Stony Clove Reservoir Tunnel Dimensions

Type	Tunnel Diameter [ft]	Tunnel Length [mi]	Composition/Lining
Headrace Tunnel	38	1.44	Concrete-lined
Surge Shaft	34	0.02	Concrete or Steel lined
Vertical Shaft	34	0.27	Concrete-lined
Horizontal Tunnel	34	10.03	Concrete-lined
Penstocks (5)	22	0.15	High Strength Steel
Tailrace Tunnel	40	2.08	Concrete-lined

Table 3. Woodland Reservoir Tunnel Dimensions

Type	Tunnel Diameter [ft]	Tunnel Length [mi]	Composition/Lining
Headrace Tunnel	46	1.19	Concrete-lined
Surge Shaft	41	0.04	Concrete or Steel lined
Vertical Shaft	41	0.22	Concrete-lined
Horizontal Tunnel	41	8.29	Concrete-lined
Penstocks (5)	26	0.12	High Strength Steel
Tailrace Tunnel	49	1.72	Concrete-lined

Table 4. Wittenberg Reservoir Tunnel Dimensions

Туре	Tunnel Diameter [ft]	Tunnel Length [mi]	Composition/Lining
Headrace Tunnel	47	0.39	Concrete-lined
Surge Shaft	42	0.04	Concrete or Steel lined
Vertical Shaft	42	0.07	Concrete-lined
Horizontal Tunnel	42	2.71	Concrete-lined
Penstocks (5)	27	0.04	High Strength Steel
Tailrace Tunnel	50	0.56	Concrete-lined

The powerhouse would be located west of the existing Ashokan Reservoir. The approximate floor level would be between 200 to 300 ft below ground level. The cavern will be stabilized with high strength projected concrete (shotcrete) and the powerhouse will include steel formwork and concrete as necessary. The tentative dimensions for the powerhouse are 500 ft long, 125 ft wide, and 150 ft high. On the other hand, the cavern of the transformers chamber also will be stabilized with high strength shotcrete. This chamber will have tentative dimensions of 165 ft long, 60 ft wide, and 50 ft high. The powerhouse generating/pumping units, electrical switchyards, interconnecting transmission lines, and other appurtenant facilities would complete the project.

The proposed Ashokan Pumped Storage Project is expected to have a rated capacity of 800 MW. It would interconnect with the existing Hurley Avenue Substation to facilitate pumped storage operations. Consequently, the project would be most attractive to the New York Independent System Operator (NYISO) member utilities, due to the proposed use for storing renewable resources in the area. Additionally, other electrical utilities in New York and New

Jersey are expected to be interested in the project as a resource for storing and maximizing renewable energy use.

2. RESERVOIRS

The upper and lower reservoirs configuration would be determined by evaluating the best suited alternative to maximize the available hydraulic head and minimize the penstock layout to reduce energy losses, while staying within environmental constraints. The proposed reservoir sites within this application are the result of conceptual engineering completed by Premium Energy and its consultants. During the term of the preliminary permit, Premium Energy will further investigate on the pumped storage reservoirs configuration and select the best suited location for energy, economic, and environmental considerations.

The project concept includes the existing Ashokan Reservoir with a raised dam serving as a lower reservoir and one of the three alternatives for an upper reservoir in the Catskill Mountains. A hydraulic head of up to 914 ft would exist between the new upper reservoir and the Ashokan reservoir, which would be exploited for hydro power generation.

A. Lower Reservoir Configuration

The project proposes the existing Ashokan Reservoir, that will be used as the lower pool for the pumped storage operation. The existing Ashokan Reservoir has a maximum water surface elevation of 586 ft. The reservoir's water surface covers 8,300 acres, with around 382,358 acreft of storage capacity. Also, additional water volume at Ashokan reservoir would be discharged through the Esopus Creek (southeast basin).

The existing Ashokan Reservoir would experience a maximum surface level variation of 2 ft during operation of the Project, and approximately 15,800 acre-ft would be used for pumping or generating power. With this volume, operation at 800 MW would be possible for 12 hours of continuous output.

B. Upper Reservoir Configuration

The project's three proposed upper reservoir alternatives are located in the vicinity of the Friday Mountain, the Wittenberg Mountain, and the Southwest Hunter Mountain, near the Ashokan Reservoir. The proposed upper reservoir would be built in either the Stony Clove Creek, the Woodland Creek, or the Maltby Hollow Brook (Wittenberg Reservoir). The new upper reservoir alternatives' physical characteristics are detailed in table 5.

Table 5. Upper Reservoir Alternatives Characteristics

Proposed Upper Reservoir	Surface Area [acre]	Storage Capacity [acre-ft]	Maximum Surface Elevation [ft]	Head Compared to Lower Reservoir [ft]
Stony Clove Reservoir	245	22,496	1,500	914
Woodland Reservoir	313	26,231	1,210	624
Wittenberg Reservoir	226	25,558	1,180	594

The new reservoirs will have intake-outlet structures with a submerged intake elevation at an adequate height to enable pumped storage operation. Below this elevation, a permanent reserve of water will remain in the reservoirs. From the intake-outlet structures, a pressure tunnel will unfold to connect the new Ashokan PS Powerhouse and then to the existing Ashokan Reservoir. The proposed upper reservoir alternatives would have enough stored water for the Ashokan Pumped Storage Power Plant to generate 800 MW for 12 hours.

The new upper reservoir alternatives site would naturally discharge runoff water through its own concrete spillways to the existing streams which would be impounded. During high water level season, excess water from the proposed upper reservoirs would be discharged to the Stony Clove Creek, the Woodland Creek or the Maltby Hollow Brook, respectively. These streams naturally discharge to the Esopus Creek and the Ashokan Reservoir.

3. TRANSMISSION LINES

The Project's powerhouse would be connected to the proposed Ashokan Switchyard, from where the Project would connect to the existing Hurley Avenue Substation. In order to store energy or deliver power to the regional electrical utility network, construction of a new 230 AC transmission line will be necessary to transmit power from the Ashokan Pumped Storage Switchyard to the existing Hurley Avenue Substation. The new transmission line will require a new corridor with a length of 12.9 miles (Wittenberg Reservoir alternative) or 17.3 miles (Stony Clove and Woodland Reservoir alternatives). From the Hurley Avenue Substation, the following transmission paths would be available:

- Power transmission to Ohioville, NY, through the existing Central Hudson Gas & Electric 115 kV AC transmission line, which may require capacity upgrades.
- Or power transmission to Roseton, NY, through the existing Central Hudson Gas & Electric 345 kV AC transmission line.

Further studies of the project's transmission lines location/alignment, type of towers, number of circuits, conductor selection, and number of bundle conductors per phase, as well as interconnection alternatives will be carried out during the term of this preliminary permit, to select the most preferable line design. Additionally, preliminary system impact studies of the project interconnection will be conducted to determine the minimum network improvements for the interaction of the project with the existing AC network system.

4. PROJECT CAPACITY

Based on preliminary analysis, the planned total installed capacity of the Ashokan Pumped Storage Power Plant would be of 800 MW. However, the project's rating may vary as studies proceed. The project would store excess renewable energy, helping to integrate renewables into the grid, and to supply firm peaking power generation with primary load following capability. Premium Energy plans to conduct a system impact study and power market investigations to help further refine the range of suitable generation capabilities.

Assuming a plant capacity factor of 40%, the Ashokan Pumped Storage Power Plant, rated 800 MW for generation and 1000 MW for pumping, would produce a maximum of 2,700 GWh of annual energy production. On a preliminary analysis, the maximum gross head may be up to 914 feet, depending on the selected upper reservoir alternative. The proposed project currently

envisions procurement of five new pump-turbine generator-motor sets for the pumped storage power plant. Each pump-turine would have a nominal rating at 200 MW to supply the 1000 MW pumping mode demand.

5. FEDERAL LANDS

The lands enclosed within the proposed project boundary are New York State Lands. Therefore, there are no public land survey legal subdivisions. The project layout study boundary, as shown in Exhibit 3, encompasses both federal and private lands. The proposed Ashokan Pumped Storage Project would occupy New York's State Lands north and east of the Ashokan Reservoir; and part of New York's City Land, which is managed by the NY State Department of Conservation and the NY City Department of Environmental Protection.

The existing Ashokan Reservoir extends through the New York's City Lands. The proposed upper reservoir alternatives: Stony Clove Reservoir, Woodland Reservoir or Wittenberg Reservoir, would be created in the New York's State lands. The pressure tunnels or penstocks would go through part of the New York's State Lands and the New York's City Lands.

The interconnection of the project will require new 230 kV transmission lines interconnecting with the existing Hurley Avenue Substation. The proposed transmission corridor for these lines would extend through New York's State Lands and City Lands.

LAND DESCRIPTION

Non-Public Land States (and Non-Rectangular Survey System Lands in Public Land States)

1. STATENEW YORK	2. FERC PROJECT NONot applicable
3. FEDERAL RESERVATION:	New York State Land
4. FEDERAL LAND HOLDING AGENCY: _	NY City Department of Environmental
5. Counties: <u>L</u>	Jister County
6. Check one:	Check one:
License	Pending
XPreliminary Permit	Issued
If preliminary permit is issued, give expirati	on date:
7. Federal Tract(s) Identification Proposed Stony Cloves Reservoir Lat/Long: 42.132128°/-74.248227° Proposed Woodland Reservoir Lat/Long: 42.049120°/-74.332221° Proposed Wittenberg Reservoir Lat/Long: 41.980680°/-74.321224°	8. Exhibit Sheet Number(s) or Letter(s) Exhibit 3 – Project Layout Exhibit 3 – Electrical Interconnection Exhibit 3 – Section View of Alternative 1 Exhibit 3 – Section View of Alternative 2 Exhibit 3 – Section View of Alternative 3
Transmission Line	
9. contact's name <u>Victor M. Rojas</u>	<u> </u>
telephone no. (<u>909-595-5314</u>)	
date submittedJanuary 29, 2021_	

This information is necessary for the Federal Energy Regulatory Commission to discharge its responsibilities under Section 24 of the Federal Power Act.

LAND DESCRIPTION

Non-Public Land States (and Non-Rectangular Survey System Lands in Public Land States)

1. STATENEW YORK	2. FERC PROJECT NONot applicable
3. FEDERAL RESERVATION:	New York City Land
4. FEDERAL LAND HOLDING AGENCY:	NY State Department of Conservation_
5. Counties: <u>\</u>	Jister County
6. Check one:	Check one:
License	Pending
X_Preliminary Permit	Issued
If preliminary permit is issued, give expirati	on date:
7. Federal Tract(s) Identification Existing Ashokan Reservoir Lat/Long: 41.977006°/-74.164845° Existing Ashokan Dam Lat/Long: 41.938406°/-74.218574°	8. Exhibit Sheet Number(s) or Letter(s) Exhibit 3 – Project Layout Exhibit 3 – Electrical Interconnection Exhibit 3 – Section View of Alternative 1 Exhibit 3 – Section View of Alternative 2 Exhibit 3 – Section View of Alternative 3
<u>Transmission Line</u>	
9. contact's nameVictor M. Rojas	<u> </u>
telephone no. (<u>909-595-5314</u>)	
date submitted <u>January 29, 2021</u>	_

This information is necessary for the Federal Energy Regulatory Commission to discharge its responsibilities under Section 24 of the Federal Power Act.

EXHIBIT 2 – DESCRIPTION OF THE PROPOSED STUDIES

1. GENERAL REQUIREMENT

Premium Energy proposes to carry out an extensive feasibility study to evaluate the proposed reservoir configuration alternatives, as well as the power transmission alternatives. The primary aspects to be studied are the geological, environmental and water resources, and electrical engineering of the project. The studies would also include the economic viability and financing of the project. The complete feasibility study will include:

- Project site land investigation.
- Geological and seismic investigation.
- Soil surveys, test pits, bore holes and topographical surveying.
- Hydrological studies including runoff, rain, evaporation and groundwater flow.
- Evaluation of upper reservoir configuration alternatives.
- Devising of the project's water supply plan, including legal and water rights matters.
- Environmental and cultural impact study comprising environmental surveys, impact identification, evaluation and mitigation measures.
- Engineering studies to optimize the project's physical configuration.
- Energy market studies and determination of preliminary power sales and supply expectations.
- Evaluation of transmission interconnection alternatives including electrical system impact studies.
- Determination of size and specifications of the required electromechanical equipment.
- Cost estimates, economic feasibility and financing options investigation.

Based on the results and findings of the initial stages of the feasibility study, the applicant will prepare a Notice of Intent and Pre-Application Document as detailed in 18 C.F.R. §§5.5 and 5.6.

Temporary access roads will not be required to reach the project's proposed features site. The existing roads would be enough to perform the required studies. The existing New York State Route 28 and 28A will allow access to the existing Ashokan Reservoir. Likewise, the existing New York State Route 214 will be sufficient to reach the proposed Stony Clove Reservoir site, the existing Woodland Valley Road will reach the proposed Woodland Reservoir site. Finally, the existing Moon Haw Road will allow access to the proposed Wittenberg Reservoir site.

2. WORK PLAN FOR NEW DAMS CONSTRUCTION

The new upper reservoir dam construction will require subsurface investigations in the Catskill Mountains. The investigations would be done at the proposed upper reservoirs sites, as depicted in exhibit 3. Soil and rock borings will be necessary to determine the rock/soil structure and stability for the proposed dams and power plants foundations.

Soil and rock samples shall be extracted to conduct studies and determine the soil mechanical properties. Therefore, assessing the project site's suitability for construction of the new dams. Furthermore, seismic surveys will also be required.

The schedule of activities will be completed by the applicant during the permit period as shown in the table below:

Table 6. Schedule of Activities

Schedule	Activity
Beginning in Month 1 to the end of Month 4	Conceptual engineering and evaluation of the alternative reservoir configurations
Beginning in Month 1 to the end of Month 6	Initial scoping and consultation
Beginning in Month 5 to the end of Month 10	Geotechnical and hydrological studies
Beginning in Month 7 to the end of Month 12	Soil and topographical surveying
Beginning in Month 1 to the end of Month 16	Environmental and cultural impact study
Beginning in Month 1 to the end of Month 14	Engineering studies to optimize the project's physical configuration
Beginning in Month 4 to the end of Month 16	Planning and evaluation of transmission interconnection alternatives
Beginning in Month 1 to the end of Month 12	Devising of water supply plan
Beginning in Month 12 to the end of Month 18	Legal and water rights matters
Beginning in Month 14 to the end of Month 24	Determination of size and specifications of the required equipment
Beginning in Month 10 to the end of Month 16	Energy market assessment
Beginning in Month 6 to the end of Month 16	Economic study for feasibility & financial planning investigation
Beginning in Month 10 to the end of Month 16	Preliminary licensing proposal, consultation, and documentation
Beginning in Month 16 to the end of Month 24	Preparation, review and filing of the FERC license application

The schedule of activities may deviate from its initial formulation. Activities may be adjusted or supplemented depending upon circumstances which may develop as the studies proceed. Remedial actions to the possible disturbance of the proposed studies include the implementation of an erosion and material disposal plan, backfilling of core borings and test pits, and replanting any disturbed vegetation.

3. STATEMENT OF COSTS AND FINANCING

The total estimated cost of carrying out or preparing the studies, investigations, tests, surveys, maps, plans or specifications described above are \$5 Million.

The expected sources of financing available to carry out the activities of the described feasibility study are:

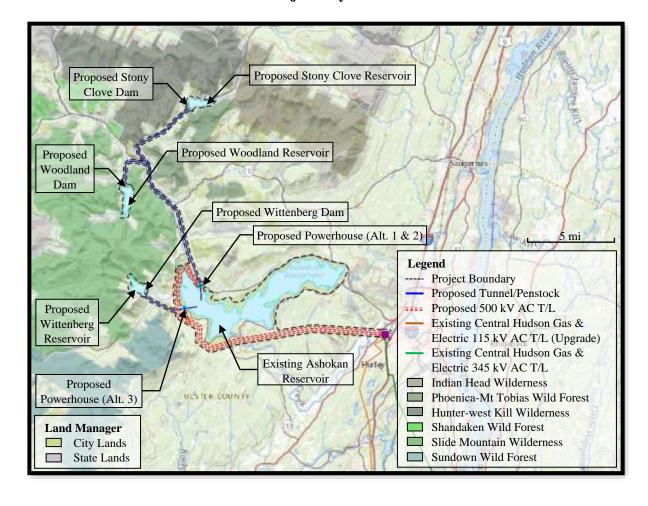
- o Premium Energy's available funds.
- Balance raising through investors.

The proposed market for the energy storage and production covers the electric markets in New York. Power purchasing entities and other potential off-takers will be identified in further investigations during the term of the preliminary permit.

EXHIBIT 3 - ASHOKAN PUMPED STORAGE PROJECT MAP

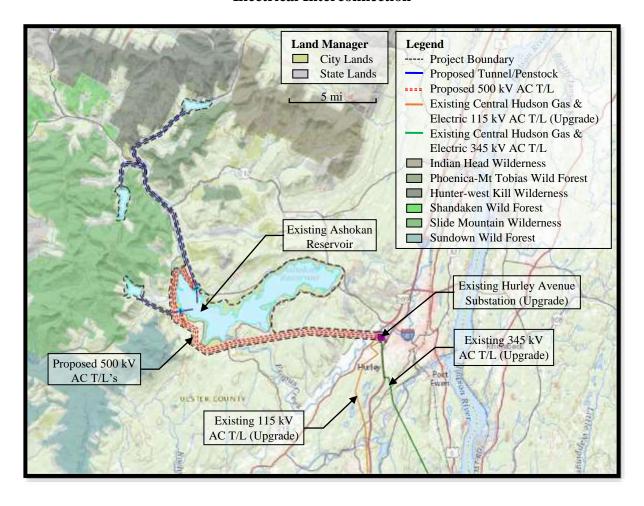
Ashokan Pumped Storage Project Study Area Boundary

Project Layout

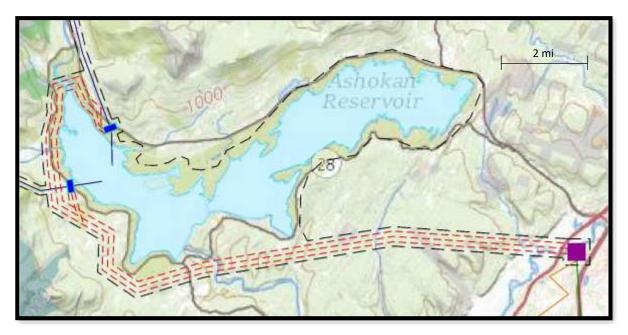


Ashokan Pumped Storage Project Study Area Boundary

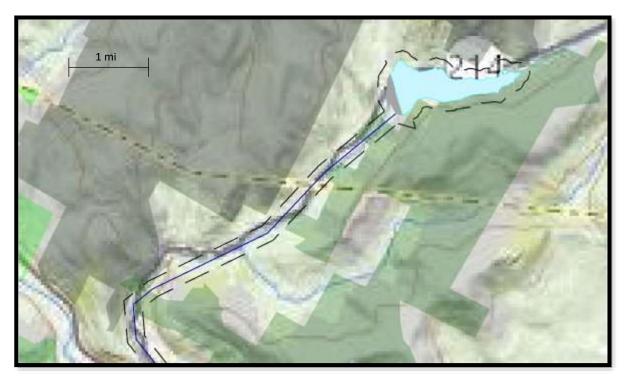
Electrical Interconnection



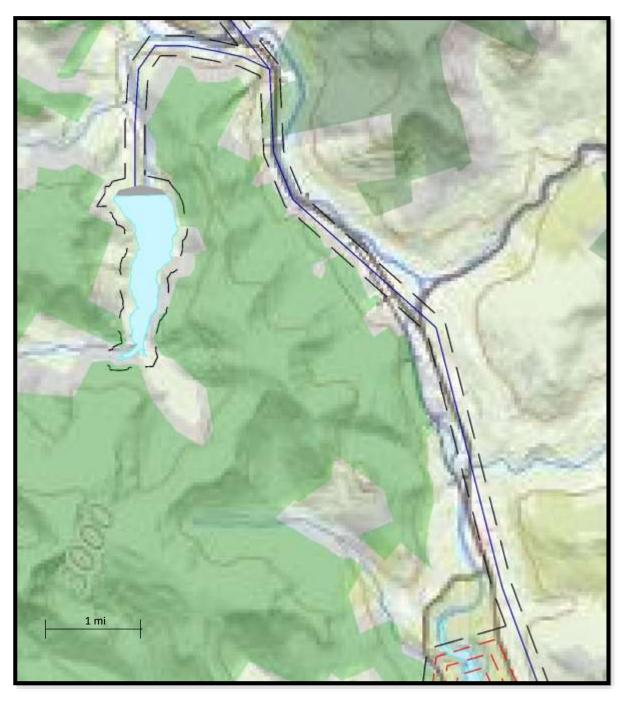
Existing Ashokan Reservoir Limits



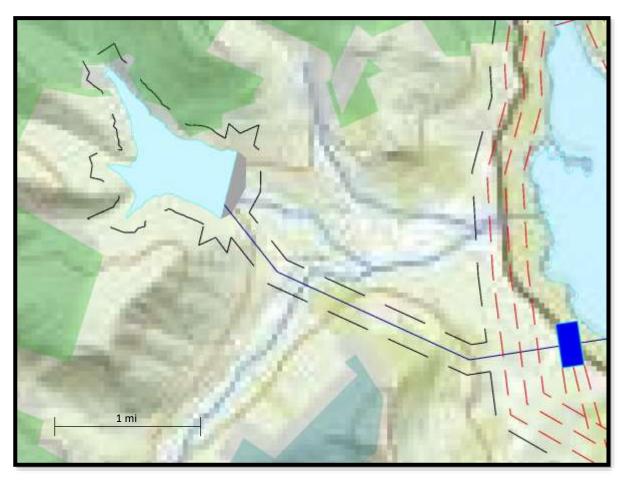
Proposed Stony Clove Reservoir Limits



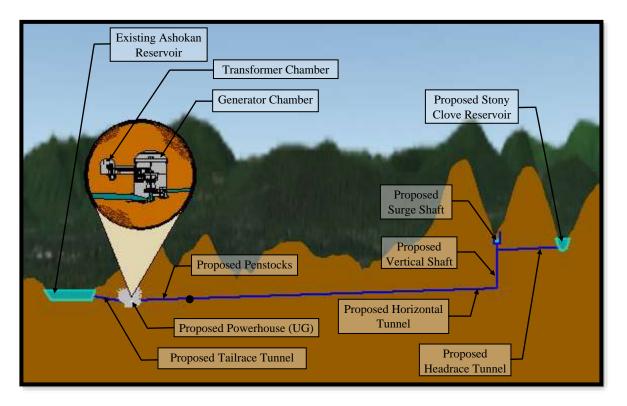
Proposed Woodland Reservoir Limits



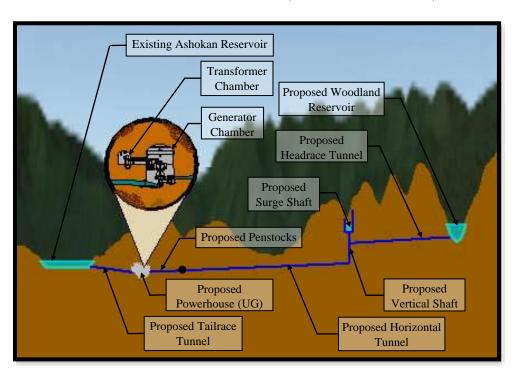
Proposed Wittenberg Reservoir Limits



Section View of Alternative 1 (Stony Clove Reservoir)



Section View of Alternative 2 (Woodland Reservoir)



Section View of Alternative 3 (Wittenberg Reservoir)

