

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Premium Energy Holdings, LLC )  
Ashokan Pumped Storage Project )

Project No. P-15056-000

MOTION TO INTERVENE

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 385.214 (2007), I, Miles Naughton, file this motion to intervene in this proceeding.

I. COMMUNICATIONS AND SERVICE

All communications, pleadings, and orders with respect to this proceeding should be sent to the following individual:

Miles T. Naughton  
126 Moonhaw Road  
West Shokan, NY 12494  
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mtnaughton@hotmail.com

II. INTEREST OF PETITIONER

I have important information and perspectives to bring to this process, consideration of which will serve the public interest.

I strongly oppose the proposal by Premium Energy Holdings to build a pumped storage plant at the Ashokan Reservoir in New York's Catskill Mountains.

I do understand the need for energy storage and that pumped storage can be the preferred option if a proper location is found. A location using a closed loop system where it would have minimal impact on the environment, wildlife and communities involved.

Premium Energy's open loop proposal seems to have overlooked these criteria. The three sites they proposed for this project are located in an area that is a delicate balance of highly preserved lands, rich wildlife, and diverse watershed communities.

This project would have severe impacts on highly preserved forests and lands. The Catskill Forest Preserve is 700,000 acres of continuous wildlife habitat in an increasingly fragmented environment; the forest around the proposed sites ranks among the top 1% of forest habitats region-wide according to the New York State Forest Condition Index.

As a State Forest Preserve, the Catskills are considered Status 1 land under USGS "Gap Analysis Program." According to the Dept. of Energy's own Hydropower Vision, "areas with formal

protections designated as Status 1 or 2 under the USGS Gap Analysis Program are avoided for development.” Under Article XIV of the NYS Constitution, the lands “shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private.

The proposed project would wreak havoc on stream ecology and vital trout habitat. Maltby Hollow Brook has some of the highest quality water in the region coming directly from the highest peaks in the Catskills. This area provides superb spawning grounds for brown, rainbow and brook trout. The proposed dam would cause rapid fluctuations of water flow which is needed to maintain a healthy ecosystem. Furthermore, a slow-moving or still reservoir would heat up, resulting in abnormal temperature fluctuations which can lead to algal blooms and decreased oxygen levels. Today it is estimated that less than 9% of the areas that historically supported brook trout are intact.

Native brook trout, which require the highest quality waters, currently thrive in Maltby Hollow brook. Altering the stream ecology here would make this area forever uninhabitable to brook, and all other species of trout.

New York City has one of the largest and complex unfiltered water systems in the country. Ashokan Reservoir provides 40% of this water. The streams affected in this proposal all provide class A water from the higher peaks and forests down to the Ashokan Reservoir. Diverting water through an open pumped storage system would upset the natural filtration of water coming into the reservoir and likely increase turbidity which would have a negative impact on water quality. Currently, NYC meets its water needs through watershed management and water quality preservation. If NYC were to lose its ability to use unfiltered water due to loss of water quality, the estimated cost to operate a filtration system could exceed one million dollars per day.

Furthermore, this proposal would have an extreme impact on the watershed communities affected. All three sites would put sections of each community underwater. This includes infrastructure, roads, historic sites, and some of the most pristine homes, estates, and private lands in the region. The remaining sections of each community would be transitioned into a vast flood zone. At a time when global warming is making the weather more extreme and the streams flashier and more erratic.

I think it would be in Prime Energy’s best interest to first do some research on a proposed site instead of hastily picking spots from a topo map from thousands of miles away. Prime Energy’s proposal is ill-conceived and unacceptable, and it is my hope that FERC will reject this proposal.

Sincerely,  
Miles T. Naughton

### III. CONCLUSION

Wherefore, I Miles Naughton, respectfully request that the Commission grant my Motion to Intervene as a party with full rights to participate in all further proceedings.

Respectfully submitted on this (04/03/2021)

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