



April 6, 2021

Online submission - Motion to Intervene: Ashokan Pump Storage Docket # P-15056

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

RE: MOTION TO INTERVENE Docket # P-15056 – Ashokan Pumped Storage Project

Dear Secretary Bose:

Pursuant to Rule 214 of the Rules, Practices and Procedures (18 CFR Section 385.314), Catskill Mountainkeeper, a non-profit organization with its primary office in Livingston Manor in Sullivan County New York and a satellite office in Woodstock in Ulster County New York, hereby petitions the Federal Energy Regulatory Commission to grant it full party status in the above captioned proceeding. The persons to whom communications should be addressed and to whom service should be made are as follows:

Kathy Nolan, Senior Research Director
PO Box 1081
Woodstock NY 12498
kathy@catskillmountainkeeper.org

Ramsay Adams, Executive Director
PO Box 1000
Livingston Manor NY 12758
ramsay@catskillmountainkeeper.org

As grounds for this Motion, Catskill Mountainkeeper states as follows:

Catskill Mountainkeeper, a 501(3)(3) non-profit organization has a vital interest in the Preliminary Permit application submitted to the Commission by Premium Energy Holdings for the Ashokan Pumped Storage Project (P-15056). Catskill Mountainkeeper is a nationally recognized advocate for the Catskill region and works with a network of more than 40,000 concerned citizens and strategic partners to protect and promote our region's extraordinary natural heritage, while promoting smart development that supports local communities. Many of those in our network live, work, and recreate at and within 15 miles of the Ashokan Reservoir, at and within 15 miles of the proposed alternative sites for the Ashokan Pumped Storage Project's Upper Reservoir, and in New York City and other towns and cities served by the Ashokan Reservoir as a source of drinking water. One member of Catskill Mountainkeeper's staff lives in Shandaken, a town with a population of approximately 3,000 people that is listed as a potential site for two of the alternative configurations of the subject proposal. Catskill Mountainkeeper seeks to become a party to this proceeding to ensure the public interests of residents of

Shandaken, Olive, communities near the Ashokan Reservoir, and residents of New York City are adequately represented. Our members stand at risk of serious harms from the construction and operation of the project, as well as from additional infrastructure necessary to service it, such as the Ashokan Switchyard, powerhouse, and transmission lines. Accordingly, Catskill Mountainkeeper has a substantial interest in this matter. No other party represents Catskill Mountainkeeper's interests, and no other party reasonably could do so. Neither disruption to the proceedings nor any additional burden to any party will result from the granting of this Motion. In light of the foregoing, Catskill Mountainkeeper respectfully petitions for intervention.

Sincerely,
Ramsay Adams
Executive Director
845-439-1230