



CATSKILLCENTER

April 7, 2021

Online submission - Motion to Intervene: Ashokan Pump Storage Project 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 Center for Conservation and Development, a non-profit organization with its primary office in Arkville in Delaware County, New York, a satellite office in Mt. Tremper in Ulster County, New York, and a satellite office in Tannersville in Greene 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:

Andy Mossey
Stewardship & Advocacy Coordinator
P.O. Box 504
Arkville, NY 12406
amossey@catskillcenter.org

Jeffrey Senterman
Executive Director
P.O. Box 504
Arkville, NY 12406
(845) 586-2611

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

Catskill Center, 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 Center is a nationally recognized advocate for the Catskill region, the Catskill Park, and the Catskill Forest Preserve. We work with a network of strategic partners that represent tens of thousands of concerned citizens who work to protect and promote our region's extraordinary natural environment, while promoting smart development that helps our local communities thrive. 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 Center's staff lives in Olive, a town with a population of approximately 4,500 people that is listed as a potential site for alternative

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configurations of the subject proposal. Another member of Catskill Center's staff lives in Hunter, a town with a population of approximately 2,700 people that is listed as a potential site for one of the alternative configurations of the subject proposal.

Catskill Center seeks to become a party to this proceeding to ensure the public interests of residents of Shandaken, Olive, Hunter, 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 Center has a substantial interest in this matter. No other party represents Catskill Center'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 Center respectfully petitions for intervention.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff P. Senterman", with a long horizontal flourish extending to the right.

Jeffrey Senterman
Executive Director
(845) 768-2657