

April 11, 2021

Online submission - Motion to Intervene: Ashokan Pump Storage Project

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), Damascus Citizens for Sustainability (DCS), a non-profit organization with its primary office in Narrowsburg in Sullivan 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:

Barbara Arrindell, Director P.O. Box 35 email, <u>director@DamascusCitizens.org</u> Narrowsburg, NY 12764 and Jeff Zimmerman, DCS Attorney email, <u>johnjeffreyzimmerman@gmail.com</u> Zimmerman and Associates 13508 Maidstone Lane Potomac, MD 20854

As grounds for this Motion, Damascus Citizens for Sustainability states as follows:

Damascus Citizens for Sustainability (DCS), a 501(c)(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). Damascus Citizens for Sustainability is a recognized advocate for the Catskill region and works with a network of more than 5,000 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 Damascus Citizens for Sustainability lives in Olive, a very small town that is listed as a potential site for one of the possible dams in the proposal and we have numerous members who live in New York City and surroundings that depend on the Ashokan Reservoir as a source of drinking water. DCS seeks to become a party to this proceeding to ensure the public interests of

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residents of Shandaken, Olive, other 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, Damascus Citizens for Sustainability has a substantial interest in this matter. No other party represents DCS'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, Damascus Citizens for Sustainability respectfully petitions for intervention.

Sincerely, Barbara Arrindell Director Damascus Citizens for Sustainability phone 845-252-6677