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Kimberly D. Bose, Secretary
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Federal Energy Regulatory Commission
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Subject: **PACKWOOD LAKE HYDROELECTRIC PROJECT
FERC DOCKET NO. P-2244-036
PACKWOOD LAKE INTAKE FISH ENTRAINMENT MONITORING PLAN
EXTENSION OF TIME REQUEST**

References: 1) Letter dated December 18, 2019; Energy Northwest to FERC; Packwood Lake Intake Fish Entrainment Monitoring Plan Addendum
2) Letter dated October 11, 2018; FERC to Energy Northwest; Order Issuing New License
3) Packwood Lake Intake Fish Entrainment Monitoring Plan filed April 4, 2012

On January 9, 2019, Energy Northwest (EN) filed with the Federal Energy Regulatory Commission (FERC) the Packwood Lake Intake Fish Entrainment Monitoring Plan (Plan) for the Packwood Lake Hydroelectric Project (Project). The Plan was collaboratively developed during the relicensing process with requisite agencies, finalized and initially filed with FERC on April 4, 2012. EN simply updated the Plan in 2019 to reflect new implementation dates and Project upgrades that have taken place during the relicensing period, since 2008.

Based on additional collaboration with the Resource Agencies Committee (RAC) and internal feasibility analyses, EN proposed an alternative approach for addressing entrainment whereby a fish exclusion net would be placed upstream of the Project intake to prohibit rainbow trout from accessing the forebay area and eliminate the potential for entrainment. Per agreement with the RAC, EN collaboratively developed the Packwood Lake Intake Fish Entrainment Monitoring Plan Addendum (filed on December 18, 2019). The addendum detailed an agreed upon 2-year "pilot program" to determine the long-term efficacy of the fish exclusion net for preventing fish access to the Project intake.

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EN is now prepared to implement the addendum and anticipates design and procurement of the exclusion net once current restrictions associated with the COVID-19 pandemic allow. As such, EN is formally requesting an Extension of Time (EOT) for filing of the final Packwood Lake Entrainment Plan until such a time when determination of the long-term efficacy of the net can be determined, based upon data collected during the 2-year pilot program. EN has proposed the following schedule for implementation of the pilot program and ultimate submittal of the final Plan:

Milestone	Proposed Completion Date*
File Extension of Time Request	April 27, 2020
Design and Procurement of Exclusion Net	July 15, 2020
Exclusion Net Installation	September 1, 2020
Begin Monitoring (per plan addendum)	September 5, 2020
End of Monitoring Period	September 1, 2022
Analyze Data and Develop Annual Report/Work Plan	February 1, 2023
RAC Approval of Annual Report/Work Plan	April 20, 2023
Filing of Final Entrainment Plan/EOT Expires	June 15, 2023

**Dates subject to change or further EOT's dependent primarily on complications associated with the COVID-19 pandemic*

Per the table, EN is asking for an EOT for filing of the final Plan until June 15, 2023 to allow adequate time to install, monitor and assess the effectiveness of the fish exclusion net at the Packwood Lake Project intake.

If you have any questions or require additional information regarding this Plan, please contact me at 509.378.9755 or kwilliams@energy-northwest.com.

Respectfully,



Ken Williams
Supervisor, Hydro & Wind Projects

Distribution:

Hardcopy: Cowlitz Indian Tribe (3); Yakama Nation (3)