

## GB ENERGY PARK LLC

September 5, 2018

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

**RE: Request for Extension of the Commencement of Construction Deadline  
For the Gordon Butte Pumped Storage Project, Project No. 13642, Article 301**

Dear Ms. Bose:

On December 14, 2016, the Federal Energy Regulatory Commission ("FERC") issued an original license to GB Energy Park, LLC, ("GBEP") for the Gordon Butte Pumped Storage Project, Project No. 13642. (157 FERC ¶ 62,196). The Gordon Butte Pumped Storage Project will be new construction on private land, with two off stream reservoirs of equal holding capacity of 4,000 acre-feet with a below ground powerhouse taking advantage of the 1,025 feet elevation difference between the upper reservoir on top of Gordon Butte and the lower reservoir at the north toe of the Butte. With 400 MW planned capacity the reservoir storage will provide 3,400 MWh of storage.

GBEP continues to work diligently on the development of the project. Design efforts have been spent optimizing the turbine generator equipment, the reservoir size and placement, a second round of subsurface geology and geotechnical investigation has been completed. The necessary studies and interconnection investigations have taken place with feasibility, system impact, sub-synchronous resonance completed, and facilities study underway. GBEP has been working with targeted off-takers to understand the needs and services desired in the quickly changing Western Interconnect energy market.

GBEP has continued to work towards the construction start of the project and compliance with the terms of the License by working with stakeholders to prepare and submit management and monitoring plans. To date GBEP has completed:

- Article 202 – Exhibit A Project Description update, submitted 3/13/17 and approved on 6/22/17.
- Article 203 – Exhibit F Drawings update, submitted 1/13/17, complete.

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- Article 204 – Revised Exhibit F Drawings, submitted 3/13/17, approved 6/22/17.
- Article 205 – Revised Exhibit G Drawings, submitted 3/13/17, approved 6/22/17.
- Article 402 – Hazardous Materials Containment and Fuel Storage Plan, submitted 10/25/17, approved 1/9/18.
- Article 403 – Spill Prevention, Control, and Containment Plan, submitted 10/25/17, approved 1/9/18.
- Article 406 – Operation Compliance and Monitoring Plan, submitted 4/16/17, approved 6/23/17.
- Article 408 – Noxious Weed Control Plan, submitted 10/27/17, approved 1/11/18.
- Article 409 – Vegetation Management Plan, submitted 10/24/17, approved 11/27/17.
- Article 410 – Avian Electrocution and Collision Protection Plan, submitted 10/26/17, approved 11/27/17.
- Article 415 – Construction Noise Mitigation Plan, submitted 11/1/17, approved 11/27/17.
- Article 416 – Construction Workforce Management Plan, submitted 11/1/17, approved 11/27/17.
- Form L-11, Article 20 – Reservoir Clearing Plan, submitted 8/9/17, approved 11/2/17.

Section 13 of the Federal Power Act (FPA), 16 U.S.C. § 806, authorizes the Commission to grant one extension of the commencement of construction deadline, for no more than two additional years. GBEP has and is continuing to move forward with the development of the Gordon Butte Pumped Storage Project and respectfully requests the granting of a two-year extension to the commencement of construction date to December 14, 2020.

GBEP is still completing design, equipment procurement and construction scheduling and will, when more definitive information is available, request an extension of the construction completion deadline.

Respectfully submitted,



Rhett Hurless

SR VP / COO

Cc: Steve Padula, Hydro Regulatory Services LLC  
Douglas Johnson, FERC Regional Office Portland  
Christopher White, FERC Regional Office Portland  
Martin Weber, Stanley Consultants

Document Content(s)

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