

ALASKA POWER & TELEPHONE COMPANY

P.O. BOX 3222 – 193 OTTO STREET
PORT TOWNSEND, WA 98368
(360) 385-1733 – (800) 982-0136
FAX (360) 385-5177

February 6, 2008

Kimberly D. Bose
Office of Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Yukon River Hydrokinetic Turbine Project
Notice of Intent to File For Pilot License & Draft License Application

Dear Ms. Bose:

Pursuant to Section 5.18 of the Commission's regulations (18CFR Ch. 1 §5.18), Alaska Power & Telephone Company (AP&T) hereby gives notice of its intent to file for a Pilot License to test a hydrokinetic river turbine design on the Yukon River, located at Eagle, Alaska (The Project). AP&T does not currently hold a preliminary permit for this Project, but instead wishes to submit a Draft Pilot License Application along with this NOI.

AP&T requests the waiver and/or modification of the appropriate regulations pursuant to the Commissions Part 5 regulations to use the Pilot Licensing Process instead of the Integrated Licensing Process (ILP) for the Project because this is new hydrokinetic technology that needs to be tested for its feasibility;

- (1) the project is small in that testing would involve a single turbine with a rated capacity of 100 kW and if this technology proves itself during testing, a final installation of three such units for a total capacity of 300 kW;
- (2) this is the testing phase for this project and would not require more than 5 years to complete feasibility testing;
- (3) would be located in a low sensitive area as this area of the Yukon River is not listed as being sensitive, although the Yukon River is listed as essential fish habitat; also, this project is approximately 1,300 miles from the river mouth and is not listed as a Wild & Scenic river; because the river at the Project site is wide and deep and the Project features are small, impacts are not expected to be significant (but testing will prove or disprove this);
- (4) the draft pilot license application contains information to support an environmental analysis. The only issue raised is concerns about fish/turbine interaction;

(5) this project could be quickly shut down and removed if there are unacceptable environmental effects. This project will initially be deployed from a pontoon barge and then eventually anchored to the river bottom, both of which will allow ease of access as described in the draft license application; and

(6) this project would be decommissioned at the direction of the Commission, but if found feasible, a standard license would be applied for.

In addition, the Applicant requests that the Commission designate the Applicant as the non-federal representative for Section 106 – Historic Properties consultation, and Endangered Species Act consultation.

In summary, this project has very few issues, in part because its features are either in the river or in a riverbank community, and therefore not disturbing pristine Alaska wilderness. The sole issue is really about fish and the potential for this Project to impact them. This project does not impact the river itself in that it does not impound the water, or in any way restrict the flow of water, but uses the river current to turn the turbine blades in a very passive mode of operation. Consultation has already occurred with the resource agencies to the point of receiving the necessary permits to go forward. The local Community of Eagle's governing body has issued a letter of support for this Project. This project is small, both in kilowatts and in project feature size in relation to the river, which therefore has made the resource issues small. This Project is also a test of new hydrokinetic technology, which is the reason the new licensing process was developed. This Project should be allowed to use the Pilot Hydrokinetic Licensing Process because that is the most appropriate process.

The information required to be provided in 18CFR Ch. 1 §5.5(b) is provided below.

(1) Potential applicant's name and address:

Alaska Power & Telephone Company
193 Otto Street, P.O. Box 3222
Port Townsend, WA 98368

(2) Project Number:

N/A

(9) License expiration date:

N/A

(4) An unequivocal statement of the potential applicant's intention to file an application for a Pilot Hydrokinetic License:

Alaska Power & Telephone Company hereby gives notice of its intent to file for a Pilot Hydrokinetic License to test hydrokinetic technology (river turbine) on the Yukon River, located at Eagle, Alaska.

(5) The type of principal project works licensed:

The Project would consist of the following major components:

- River turbine with its associated floatation and anchoring system

- Communication and power cable trenched into the riverbank and riverbed to the river turbine
- Control shed neither the riverbank from which the cables would intertie with the river turbine
- Substation next to control shed that will intertie with the local distribution system and will not require transmission lines

(6) The location of the project by state, county, and stream:

The Project would be located in the State of Alaska, on the Yukon River adjacent to the community of Eagle at T1S, R33E, Section 31.

(7) The installed plant capacity, if any:

The Project is proposed to have an installed capacity of 100 kW during testing and 300 kW if the project proves feasible, and after applying for a standard license.

(8) The names and mailing addresses of pertinent Federal, State, and local agencies and potential interested parties:

FEDERAL AGENCIES	
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426 (202) 502-8400	Sue Walker Protected Resources Management National Marine Fisheries Service P.O. Box 21668 Juneau, AK 99802 (907) 586-7646
Patrick J. Regan, P.E. Regional Engineer Federal Energy Regulatory Commission Division of Dam Safety & Inspections Portland Regional Office 101 S.W. Main Street, Suite 905 Portland, OR. 97204 (503) 552-2741	Dave Meyer Water Data Chief U.S. Geological Survey 4230 University Dr., Suite 201 Anchorage, AK 99508
Matt Cutlip Federal Energy Regulatory Commission Office of Energy Projects Division of Hydropower Licensing Portland Regional Office 101 S.W. Main Street, Suite 905 Portland, OR. 97204 (503) 552-2762	J. Kurland Acting Chief Protected Resources Management National Marine Fisheries Service P.O. Box 21668 Juneau, AK 99802
Bruce Halstead Field Supervisor	Tom Allen, State Director Bureau of Land Management

U.S. Fish & Wildlife Service S.E. Alaska Ecological Services 3000 Vintage Blvd., #201 Juneau, AK 99801	222 W. 7th Ave., #13 Anchorage, AK 99513 (907) 271-5080
Jeff Adams Branch Chief Fisheries and Habitat Restoration Fairbanks Fish and Wildlife Field Office US Fish & Wildlife Service 101 12th Ave Room 110 Fairbanks, AK 99701-6237 (907) 456-0218	Steve Meyers, Chief, Southern Unit Permit Processing Section Regulatory Branch U.S. Army Engineering District, Alaska P.O. Box 898 Anchorage, AK 99506
Joan Darnell, Acting Team Leader Program Support Team Alaska Systems Support Office National Park Service 240 West 5th Avenue Anchorage, AK 99501	

STATE AGENCIES

Commissioner Alaska Department of Fish & Game P.O. Box 25526 Juneau, AK 99802	Land Officer Natural Resources Officer Department of Natural Resources Division of Mining, Land, and Water Management 400 Willoughby Ave., 4th Floor Juneau, AK 99801 (907) 465-3442
John Dunker Water Resources Officer Department of Natural Resources Division of Mining & Water Management 400 Willoughby Ave., 4th Floor Juneau, AK 99801 (907) 465-2533	Water Quality Standards Assessment & Reporting Program Nancy Sonafrank, Program Manager Department of Environmental Conservation 610 University Dr. Fairbanks, AK 99709 (907) 451-2726
Judith E. Bittner State Historic Preservation Officer Alaska Department of Natural Resources Office of History & Archaeology 555 W. 7th Ave., Suite 1310 Anchorage, AK 99501 (907) 269-8721	Jim Ferguson Hydro Coordinator Alaska Department of Fish & Game 333 Raspberry Road Anchorage, AK 99518 (907) 267-2312

Eric Volk
AYK Regional Research Supervisor
Alaska Department of Fish and Game
Commercial Fisheries Division
333 Raspberry Road
Anchorage, AK 99518
(907) 267-2335

INDIAN TRIBES

Village Council - Eagle Traditional Council (IRA)
P.O. Box 19
Eagle, AK 99738
Phone 907-547-2271

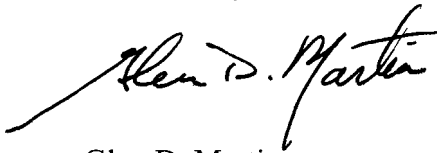
OTHER INTERESTED PARTIES

Paul Rusanowski, Biologist
Regional Manager
The Shipley Group
1584 S. 500 W, Suite 201
Woods Cross, UT 84010
(888) 270-2157

The Applicant is currently developing a study plan for implementation during the testing phase. A final study plan, after agency review, will be submitted to the Commission with the final License Application, or sooner if the Commission desires.

If you have any questions about this Notification of Intent, please contact Glen Martin, Project Manager at (360) 385-1733 x122, or via email at glen.m@aptalaska.com.

Respectfully Submitted,



Glen D. Martin
Project Manager
Alaska Power & Telephone Co. (AP&T)
(360) 385-1733 x122

Enc. (as stated)