



**ANDREW M. CUOMO**  
Governor

**JOHN R. KOELMEL**  
Chairman

**GIL C. QUINIONES**  
President and Chief Executive  
Officer

VIA Electronic Filing

December 1, 2016

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

Re: Blenheim-Gilboa Pumped Storage Project, FERC No. 2685-026; Filing of Draft License Application for Comment; Request for Treatment of Exhibit F as Critical Energy Infrastructure Information; and Request for Waiver of Supporting Design Drawing under Exhibit F

Dear Secretary Bose:

The Power Authority of the State of New York (Power Authority) is relicensing the Blenheim-Gilboa Pumped Storage Project (FERC No. 2685) (Project) using the Federal Energy Regulatory Commission's (Commission) Integrated Licensing Process (ILP). Pursuant to the Commission's ILP regulations, 18 C.F.R. § 5.16(c), the Power Authority hereby files its Draft License Application (DLA) that seeks a new license for the Project.

In accordance with 18 C.F.R. § 5.16(e), by filing this DLA with the Commission, the Power Authority is seeking comments on the DLA from Commission staff, federal and state resource agencies, Indian Tribes and other licensing participants. The Commission's ILP regulations, 18 C.F.R. § 5.16(e), as well as the Commission's Revised Process Plan issued on September 6, 2016, require all comments on this DLA to be filed with the Commission by March 1, 2017.

The contents of this DLA were prepared in accordance with 18 C.F.R. § 5.18, § 4.51 and § 4.41, as applicable. The information contained in Exhibit F, the design drawings of the principal Project works, comprises Critical Energy Infrastructure Information (CEII) that is exempt from mandatory disclosure under the Freedom of Information Act. 5 U.S.C. § 552(b)(3); 18 C.F.R. § 388.113(c)(1). The information in Exhibit F contains detailed engineering drawings of key infrastructure of the Project. Accordingly, as required under 18 C.F.R. § 388.112(b), the Power Authority requests that the Commission treat Exhibit F as CEII. Also as required by the Commission's regulations, the information in Exhibit F has been marked as CEII and removed from the public version of the attached DLA. 18 C.F.R. § 388.112(b). Exhibit F is being filed with the Commission as a separate CEII electronic document, through the Commission's eFiling system.

With regard to the Final License Application (FLA) for the relicensing of the Project, the Power Authority respectfully requests a waiver of the requirement that Exhibit F contain a supporting design report (SDR) for the Project. *See* 18 C.F.R. §§ 4.51(g), 4.41(g)(3). The Project is already subject to FERC Part 12 Dam Safety regulations. In addition, all SDRs are currently on file with the Commission's Division of Dam Safety and Inspections in the New York Regional Office.



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Finally, with regard to the Exhibit G maps included in this DLA, the Power Authority notes that the Commission's regulations require Project boundary information to be filed in a shape file or similar format. See 18 C.F.R. §§ 4.51(h), 4.41(h). The Power Authority will submit the shape file or similar format with the FLA.

If you have any questions regarding this filing, please direct them to me at (914) 681-6564 or [Rob.Daly@nypa.gov](mailto:Rob.Daly@nypa.gov).

Sincerely,

Robert Daly  
Licensing Manager