

2. PROCESS PLAN, SCHEDULE, AND COMMUNICATIONS PROTOCOL

The following sections contain information concerning licensing approach and early consultation; process plan and schedule; communications and document distribution; working groups; and development of a licensing study program.

2.1. Overview of Licensing Approach and Early Consultation

The Susitna-Watana Hydroelectric Project is being studied and evaluated by AEA under a proposed Preliminary Permit pursuant to Section 4(f) of the Federal Power Act (FPA). For the licensing of the Project, AEA is using the Integrated Licensing Process (ILP), the default process used by FERC, to guide the application development process in a collaborative, but structured manner. In accordance with the ILP requirements under 18 CFR Part 5, the NOI and PAD are being filed simultaneously and distributed to federal and state resource agencies, local governments, Alaska Native entities, ANCSA Corporations and members of the public and other interested parties. The ILP provides a consistent framework for the consultation process with agencies, Alaska Native entities, ANCSA Corporations, and other stakeholders during the period leading up to the filing of the license application.

The PAD follows the content and form requirements of 18 CFR 5.6. The purpose of the PAD is to provide substantial background information related to the engineering, operational, economic, and environmental aspects of the Susitna-Watana Hydroelectric Project, as well as to identify and define issues and potential study needs. AEA also intends to use the PAD as a first step in developing appropriate protection, mitigation, and enhancement (PM&E) measures, which in turn may lead to a formal agreement or agreements with stakeholders in support of a 50-year FERC license. The filing of the NOI and PAD with FERC officially starts the ILP process for this Project.

In preparing the PAD, AEA researched and reviewed reasonably available, relevant information concerning the existing conditions and environment in and around the Project site. This information was obtained through the search of various public information and reference sources, site visits, and stakeholder contacts and consultations.

Starting in early 2011, AEA implemented a stakeholder outreach program and initiated baseline environmental information gathering activities. AEA conducted meetings and has posted extensive licensing information on its website at <http://www.sustina-watanahydro.org>. Goals of the outreach process included providing stakeholders with relevant background information related to the Project and environmental resources. In addition, these meetings have helped AEA identify and scope issues and develop initial study plans to be incorporated into the PAD.

AEA has incorporated into this PAD the results of its early stakeholder outreach program, including a list of issue statements and study plan summaries (Section 5), brief summaries of

draft 2012 informal study plans and a summary of discussions with stakeholders prior to filing this document (Appendix 6-1).

2.2. Process Plan and Schedule

The Process Plan and Schedule outlines the specific timeframes, deadlines, and responsibilities of FERC, AEA (the Applicant), and other stakeholders in the ILP from the filing of the NOI and PAD through the filing of the application for license. In accordance with FERC regulations [18 CFR 5.6 (d)(1)], AEA must adhere to the plan and schedule for pre-application activities including timelines for pre-filing consultation, information gathering, and resource studies. The plan and schedule also includes proposed locations and dates for the scoping meetings. Table 2.2-1 presents AEA's Process Plan and Schedule for pre-application activities. In developing the proposed Process Plan and Schedule, AEA has included timeframes for Formal Dispute Resolution, highlighted in yellow [18 CFR 5.14] even though AEA anticipates resolving any study disputes through an informal process by working directly with all parties to reach consensus.

Table 2.2-1. Susitna-Watana Proposed Process Plan and Schedule				
18 C.F.R. §	Lead	Action	Early Start	Late Finish
§ 5.5	AEA	File Notification of Intent (NOI)		12/29/11
§ 5.6	AEA	File Pre-Application Document (PAD)		12/29/11
§ 5.7	FERC	Tribal Consultation	12/30/11	01/30/12
		Initial Tribal Consultation Meeting (NLT 30 days after NOI)	12/30/11	01/30/12
§5.8	FERC	FERC Notices NOI/PAD & Issues Scoping Document I	12/30/11	02/27/12
(a)		FERC issues notice of commencement of proceeding and scoping document		
(b)(2)		FERC request to initiate informal Section 7 ESA consultation and designation of applicant as the Commission's non-federal representative		
(c)		FERC issues Scoping Document 1 (SD1)		
(b)(3)(viii)	FERC	Public Scoping Meeting & Site Visit	02/27/12	03/28/12
		(Within 30 days after Commencement Notice)		
(d)		Project Site Visit (Proposed Dates)	(08/29/11)	(07/11/12)
		Public Scoping Meetings (Proposed Dates)	03/22/12	03/28/12
§ 5.9	Participants	Comments on PAD, SD1 and Study Requests	02/27/11	04/27/12
(a)		Participants file comments on PAD & SD1 and study requests (Within 60 days of Commencement Notices)		
§ 5.10	FERC	Scoping Document 2 (If Necessary)	04/27/12	06/11/12
		FERC issues Scoping Document 2 (SD2) (Within 45 days of SD1 comments)		
§ 5.11	Applicant	Applicant's Proposed Study Plan & Study Plan Meetings	04/27/12	07/11/12
		Applicant files w/ FERC a proposed study plan (Tied to SD1)	04/27/12	06/11/12
		Conduct Study Plan Meetings	04/27/12	07/11/12
		Initial Study Plan Meeting	07/09/12	07/11/12
		(NLT 30 days after Applicant files study plan)		
§ 5.12	Participants	Comments on proposed study plan	06/11/12	09/10/12
		Participants file comments on Applicant's proposed study plan (Within 90 days of Applicant filed plans)	06/11/12	09/10/12
§ 5.13		Revised study plan and study plan determination	09/10/12	11/29/12
(a)	Applicant	Applicant files revised study plan w/ FERC	09/10/12	10/10/12
(b)	Participants	Participants file comments on revised study plan w/ FERC	10/10/12	10/25/12
(c)	FERC	FERC issues Study Plan Determination	10/10/12	11/09/12
(d)		Study plans approved (If no study plan dispute)	11/09/12	11/29/12

§ 5.14		Formal study dispute resolution process (Formal Study Plan Dispute)	11/09/12	02/07/13
(a)	MCA/T	Mandatory condition agency/tribes (MCA/T) file Notice of Dispute (Within 20 days)	11/09/12	11/29/12
(d)	FERC	FERC convenes Dispute Resolution Panel (DRP) (Within 20 days)	11/09/12	12/19/12
(i)	Applicant	Applicant files comments re: dispute w/ FERC (NLT 25 days)	11/09/12	12/24/12
(k)	DRP	Dispute Resolution Panel (DRP) delivers to FERC finding of dispute (NLT 50 days)	12/19/12	01/18/13
(l)	FERC	FERC issues written determination re: dispute (NLT 70 days)	01/18/13	02/07/13
(d)		Study plans amended/approved (Formal Study Plan Dispute Process)	01/18/13	02/07/13
§ 5.15		Conduct Studies	11/30/12	03/11/15
(a)		Implement Study Plans (Tied to “No study plan dispute”)	11/30/12	11/30/14
	Applicant	Implement Study Plans (1 st Season)	11/30/12	10/12/13
(b)	Applicant	Applicant prepares & files periodic Study Plan progress reports	02/01/13	11/11/13
(c)(1)	Applicant	Applicant prepares & files Initial Study Report (NLT 1 year after FERC study plan approval)	08/15/13	11/29/13
		Initial Study Report Filing Deadline		11/29/13
(c)(2)	Applicant	Applicant holds study plan meeting (Within 15 days)	11/29/13	12/13/13
(c)(3)	Applicant	Applicant files study plan meeting summary & plan modifications (Within 15 days)	12/13/13	12/27/13
(c)(4)	Participants	Meeting summary & study plan disagreement filing by participants (Within 30 days)	11/29/13	01/24/14
(c)(5)	Applicant	Applicant files response to disagreement (Within 30 days)	01/24/14	02/24/14
(c)(6)	FERC	FERC resolves disagreement & amends study plan (NLT 30 days)	02/24/14	03/26/14
(c)(7)		Meeting Summary & Plan Modifications Approved (No Disagreement Filed by Participants)		01/27/14
		Meeting Summary & Plan Modifications Approved (Disagreement filed by Participants)		03/26/14
(f)	Applicant	Applicant prepares & files Updated Initial Study Report	08/11/14	11/28/14
	Applicant	Applicant holds study plan meeting (Within 15 days)		12/12/14
	Applicant	Applicant files study plan meeting summary & plan modifications		12/23/14
	Participants	Meeting summary & study plan disagreement filing by participants		01/26/15
	Applicant	Applicant files response to disagreement (Within 30 days)		02/24/15
	FERC	FERC resolves disagreement & amends study plan (NLT 30 days)		03/27/15
		Meeting Summary & Plan Modifications Approved (No Disagreement filed by Participants)		01/26/15
		Meeting Summary & Plan Modifications Approved (Disagreement filed by Participants)		03/11/15
§ 5.16		Preliminary Licensing Proposal (Tied to “No study plan dispute”)	11/11/13	04/14/15
(a)(c)	Applicant	Applicant files Preliminary Licensing Proposal (or Draft License Application)		04/14/15
(e)	FERC	FERC issues comments on Preliminary Licensing Proposal (or Draft License Application)	04/14/15	07/13/15
§ 5.17		Filing of Application		09/11/15
(a)	Applicant	Applicant Files License Application		09/11/15

With this schedule, AEA assumes that formal field studies will be performed over two field seasons, during 2013 and 2014. The proposed schedule allows for additional information gathering activities and early studies in 2012. Figure 2-1 presents some of the key milestone dates and activities in a summary form for 2012 through 2015. It is AEA’s intention to complete all studies and data collection to support the license application in these three field seasons, however, it is expected data may continue to be collected beyond 2014.

Under the ILP, the Commission conducts its National Environmental Policy Act (NEPA) scoping meeting and site visit within 90 days of filing of the applicant’s Notice of Intent. The site visit is typically held in conjunction with the scoping meeting. However with the filing date of December 29, 2011, that scoping meeting would take place at the end of March 2012; that would not be a practical time to hold a site visit as there would be no chance to view the site free of ice and snow and access to the project site could be limited by winter weather. In anticipation

of the NOI and PAD filing dates, a site visit was held on August 29, 2011 to allow FERC and interested parties a chance to view the site conditions in a snow free period. Under the ILP schedule, FERC will conduct scoping meetings on March 27, 28, 29 and 30, 2012 in Anchorage, Wasilla, at Su-Valley High School near Sunshine along the Parks Highway, Fairbanks, and Glennallen, respectively. Typically, FERC holds one meeting during the day and this meeting is planned for Anchorage and will focus on soliciting comments from resource agencies and Alaska Native groups. The other scoping meetings at each location will be scheduled in the evening, starting at 7:00 pm for the convenience of the public and non-governmental organizations. All interested parties are invited to attend and participate in either or all of the scoping meetings.

The March 27, 2012 daytime meeting will be in Anchorage, planned to be held in the morning at the Loussac Public Library, 3600 Denali Street. The March 27, 2012 evening meeting is planned to be held at the Menard Sports Center Meeting Rooms, 1001 S Mack Drive in Wasilla. The March 28, 2012 evening meeting is planned to be held at the Su-Valley High School at 42728 S Parks Highway, Sunshine, AK 99676 near the junction of Talkeetna Road and the Parks Highway. The March 28, 2012 evening meeting will be held at the Carlson Center, 2010 2nd Avenue in Fairbanks and the March 29, 2012 evening meeting will be held at the Caribou Café banquet room in Glennallen, AK 99588.

More detailed information regarding the scoping meetings will be announced by FERC and will also be posted on the Susitna-Watana Project licensing website at <http://www.susitna-watanahydro.org>. Additional information can also be obtained by contacting Mr. David Turner with FERC at (202) 502-6091.

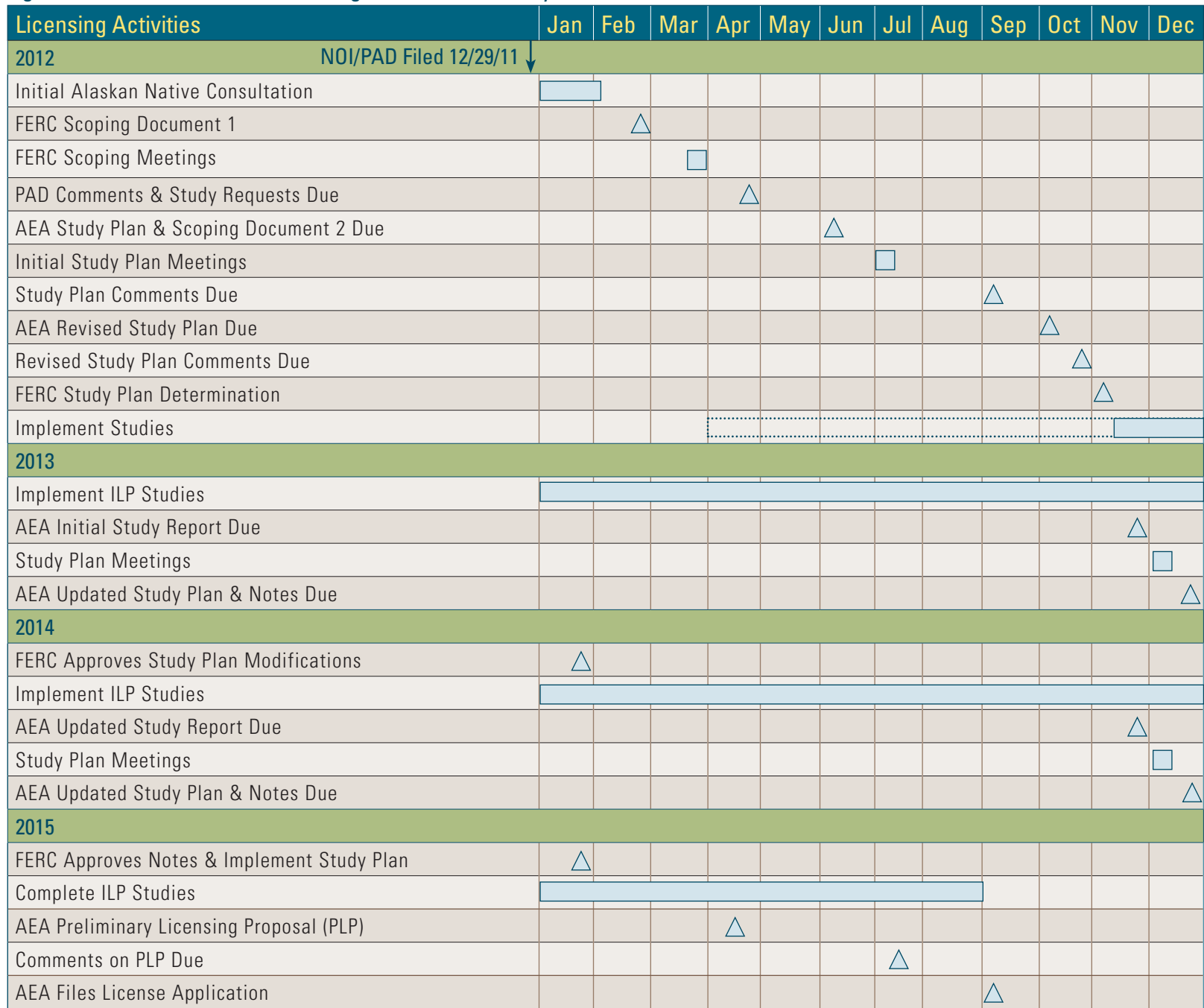
The scoping meetings will be recorded by a court reporter, and all statements, oral and written, will become part of FERC's official public record for this licensing. At the start of each meeting all individuals who attend will be asked to sign in. Anyone wishing to make a statement for the record will be asked to indicate this desire and to identify themselves and any organizations that they represent.

In addition to the opportunity to comment at the scoping meetings, all stakeholders may provide written comments to FERC by sending an original and eight copies of any written comments to:

The Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington D.C., 20426

Alternatively, stakeholders can e-file their comments to FERC's website, <http://www.ferc.gov/docs-filing/docs-filing.asp> where instructions are posted about how to file and view comments and documents in FERC's eLibrary. For any comment submissions, it is important to include the project name and project number, "Susitna-Watana Hydroelectric Project, FERC No. 14241" on the first page of any written comments. As noted in Table 2.2-1, the deadline for filing written comments on the PAD and FERC's Scoping Document 1 will be 60 days from the date of FERC's Notice of Issuance of the scoping document and consultation process.

Figure 2-1. Susitna-Watana Licensing Schedule Summary¹



■ Study Periods △ Due Dates ■ Meetings ▭ 2012 Studies

(1) Work group meetings will be planned as needed through 2015.

2.3. Communications and Document Distribution

This Communication Protocol (Protocol) is intended to facilitate communication and cooperation among AEA, federal and state agencies, ANSCA Corporations, Alaska Native groups, and other interested organizations and parties (collectively Participants) during the preparation of AEA's Application for Original License for the Susitna-Watana Hydroelectric Project (Project). This Protocol is structured to complement the requirements of the ILP for the pre-application consultation period for the Project licensing effort. AEA believes that the ILP, supplemented by the provisions outlined below, is the most effective process for completing the necessary pre-application work while providing for meaningful participation by agencies, other interested organizations and the public.

This Protocol is intended to provide a structured framework for communications among all Participants and provide AEA's plans regarding access to information regarding the consultation activities related to the licensing and planning of the Project. The Protocol also applies to communications to and from consultants on behalf of AEA, or any of the Participants. This Protocol is not intended to apply to communications solely between Participants, or to any Participant's internal communications. The Communication Protocol is intended to provide a flexible framework for dissemination of information and for document consultation among all participants involved in the Project licensing.

2.3.1. Maintenance of the Public Reference File

AEA will maintain copies of relevant written communications and other materials produced during the pre-filing consultation process. The consultation record will be updated regularly and available to the public on the website. Copies of the PAD will be distributed to the listing attached in Appendix 6-2 and the PAD and license application will also be provided to public libraries, or other convenient public offices located in the vicinity of the proposed Project.

This information will constitute the Formal Consultation Record covering the period prior to AEA filing the Final License Application with FERC and will be available for public viewing at two locations:

1. Public Reference File, Alaska Energy Authority, 411 W. 4th Avenue, Suite 1, Anchorage, AK 99501
2. Susitna-Watana Project Licensing Website: <http://www.susitna-watanahydro.org>

These materials will be available for public inspection during regular business hours in a form that is readily accessible, reviewable and reproducible. Copies of the materials will be available to a requester at AEA's Susitna-Watana Project Office, through the mail or electronically. AEA may charge the public the reasonable cost of reproduction, and if applicable postage, for any hard copies.

AEA will delete from any information made available in the public reference file, specific site or property locations the disclosure of which would create a risk of harm, theft, or destruction of

archeological or Alaska Native cultural resources or of the site at which the sources are located, or would violate any Federal law, including the Archeological Resources Protection Act of 1979, 16 U.S.C. 479w-3, and the National Historic Preservation Act of 1966, 16 U.S.C. 470hh. Certain documents may also be restricted from publication on the licensing website in accordance with FERC’s regulations protecting Critical Energy Infrastructure Information (CEII) (18 CFR§ 388.113) or in cases where the document contains privileged information (e.g., sensitive species locations, cultural resource sites, etc.). AEA will address requests for access to this information on a case-by-case basis, in accordance with Alaska State and federal law as needed during the licensing consultation process.

Consistent with federal and state paper-reduction policies, and in accordance with the objectives of FERC Order No. 604, AEA will transmit and receive licensing related communications and other written materials in electronic format when possible. Preferred formats are: MS Word, Adobe, MS Excel, or ASCII text.

2.3.2. Licensing Website

AEA will maintain a website (www.susitna-watanahydro.org) as the primary mode of document distribution and access to key documents developed during the course of the licensing consultation, such as the PAD and NOI, meeting notices, meeting summaries, study plans and study reports, preliminary licensing proposal/draft license application and final license application.

AEA will maintain a current calendar of upcoming and past meetings, and will post meeting materials (including agendas, handouts, and summaries) on the website to increase the availability of these materials to all Participants.

AEA will use email notifications to Participants to announce important new postings, which will help maximize review and comment opportunities, where applicable. The following table summarizes the general guidelines that AEA will follow in determining the appropriate mode of distribution for licensing documents.

Table 2.3-1. Documents Distribution Guidelines.	
Document Type	Distribution Mode(s)
Informal communications	Email or regular mail
Formal ILP Meeting notices and agendas	Website with email notice
Meeting summaries	Website with email notice
Large licensing related documents (e.g., PAD, SD1, PSP, study reports, progress reports, PLP, license application)	Website with email notice and/or CD-ROM through regular mail; paper format available upon request
PAD reference documents (to the extent practicable)	Website (scanned PDF files) or at ARLIS

2.3.3. ILP Meetings

AEA anticipates a variety of meetings being scheduled over the course of the pre-application process. These will include meetings required by the ILP as well as additional general information/project update meetings and technical work group meetings.

For meetings required by the ILP regulations, either FERC (e.g., scoping meeting) or AEA (e.g., study planning meetings) will comply with the applicable regulatory requirements and in addition AEA will post the meeting information on the Project website.

AEA will schedule the meetings for which it is responsible. AEA will solicit input from Participants on meeting dates, agendas and objectives and will seek to locate meetings to facilitate Participant attendance to most effectively accomplish those objectives.

AEA will strive to notify all Participants of meetings scheduled by AEA at least 30 days prior to the meeting date to the extent practicable. This notification may be made via email, posting on the Project website or by telephone conversation. If circumstances do not allow for the full 30 days notice, AEA may hold a meeting with less than 30 days notice.

AEA shall establish the draft meeting agenda and will strive to post a written meeting agenda on the Project website at least two weeks prior to a scheduled meeting. Participants may submit comments on the agenda to AEA up to one week before the scheduled meeting and AEA will distribute a final agenda at the meeting. In addition, the agenda may be modified at the beginning of the meeting.

AEA will strive to make available documents and other information necessary to prepare for a consultation meeting at least two weeks prior to the scheduled meeting.

2.3.4. ILP Documentation

All of the documentation requirements described below apply to substantive communications regarding the licensing of the Project; communications related to procedural matters (e.g., responding to inquiries regarding meeting scheduling) are not subject to the same documentation requirements.

2.3.4.1. Meeting Summaries

AEA will be primarily responsible for providing a written summary of the matters addressed at group meetings where agendas are posted involving AEA and Participants. To the extent practicable, a meeting summary will be posted to the Project Website within 15 days of the meeting. Comments should be submitted within 15 days of posting.

2.3.4.2. *Technical Documents*

A variety of technical documents will be produced during the course of licensing consultation, including the PAD, study plans, study reports, preliminary licensing proposal/draft license application and final license application. Whenever comments are solicited on documents, review periods will be established and communicated to Participants.

Review periods will typically be 30 days, unless longer periods are required by FERC regulations (e.g., 60 day comment period on the PAD and Scoping Document 1; 90 day comment period on the proposed study plan). AEA will consider adjusting comment periods to better utilize available time within the course of pre-application consultation, without jeopardizing the overall project schedule. Any such adjustments will be made in consultation with the Participants and subject to FERC's approval.

2.3.4.3. *Written Correspondence*

AEA requests that all licensing-related correspondence or other materials intended or required to be part of the Formal Consultation Record contain the following reference, "Alaska Energy Authority, Susitna-Watana Project, FERC Project No. 14241, Request for Inclusion in Formal Consultation Record" and be addressed to:

Wayne Dyok
Susitna-Watana Project Manager
Alaska Energy Authority
813 West Northern Lights Boulevard, Anchorage, AK 99503
wdyok@aidea.org

2.3.5. Distribution of Licensing Documentation

Distribution of the PAD and preliminary licensing proposal/draft and final license application is anticipated to be accomplished by mailing of CDs and posting the documents on the Project website and in FERC's e-Library. Hard copies of the PAD and license application documents will be made available to public libraries in Fairbanks, Talkeetna, Palmer, Anchorage and Juneau.

2.3.6. Communications with FERC staff

Communications with FERC staff that address the merits of the proceeding will be included in the public record. In order to have written communication with FERC staff made a part of the record for a project, it must be formally filed with FERC as follows:

The Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

All written communications to FERC not electronically filed must include an original and eight copies and have the following displayed on the first page:

“Alaska Energy Authority, Susitna-Watana Project, FERC Project No. 14241 – Application for License.”

FERC is strongly encouraging stakeholders to file their comments electronically via the Internet instead of submitting comments by paper. Instructions for e-Filing are provided at www.ferc.gov under the eLibrary link. Additional information on this program can be found in the regulations at 18 CFR 385.2001(a)(1)(iii). Filing comments electronically with FERC also eliminates the need for filing an original and eight copies.

2.4. Work Group Structure for Pre-Filing Technical Efforts

AEA will be responsible for coordinating ILP-related licensing activities during the pre-filing period and has formed technical work groups of agencies, ANSCA Corporations, Alaska Native groups and other interested organizations as the focal point for technical interactions. AEA initiated discussions regarding development of such work groups in 2011, during the period leading up to issuance of this PAD.

With the issuance of this PAD, AEA plans to continue utilizing work groups organized around major technical resource areas to work with AEA to implement the pre-filing ILP activities. Currently, AEA envisions work groups for the following major resource areas:

- Water Resources & Geomorphology
- Fisheries Resources
- Terrestrial Resources (botanical, wildlife, wetlands)
- Social Resources (recreation, socioeconomics, transportation, subsistence, aesthetics, and land use and management)
- Cultural Resources (archaeological and historical)

AEA envisions work groups will consist of representatives of agencies, Alaska Native groups and other interested organizations who will engage with AEA in activities including:

- Development of study plan components
- Review of study work products
- Evaluation of Project effects
- Identification of potential protection, mitigation and enhancement (PM&E) measures

These work group efforts will occur within the ILP context to assist AEA as it develops the Proposed Study Plan (PSP), implements the approved Study Plan, and develops the Preliminary Licensing Proposal (PLP) and the License Application.

Membership in work groups will be voluntary, although AEA encourages agencies and other interested organizations to assign representatives to participate regularly in the work group activities of those resource areas in which they have interest. As noted above in section 2.3, AEA

will communicate with licensing participants regarding work group activities primarily through the Project licensing website.

AEA has compiled an initial list of work group participants based on sign-in sheets from meetings and workshops held prior to the issuance of this PAD. Licensing participants' interest in one or more work groups may be communicated to AEA by utilizing sign-in sheets at upcoming scoping meetings and other licensing-related meetings. Licensing participants can also contact Betsy McGregor, Susitna-Watana Environmental Manager, at bmcgregor@aidea.org.

2.5. Development of a Licensing Study Program

This PAD includes summaries of existing, relevant information that AEA has compiled since initiating its efforts to identify and obtain reasonably available, relevant information in early 2011. This body of information forms the basis for AEA's current understanding of the resources in the vicinity of the Project potentially impacted by its development and operation. Through engagement of agencies and other interested organizations, AEA has developed a list of potential issues related to the licensing of the Project. Together, existing information and identified issues form the basis for the list of potential resource studies needed to support AEA's license application. Section 5 presents AEA's preliminary list of licensing issues and study needs. The following discussion describes the process for developing FERC-approved study plans as provided for in FERC's regulations.

Several sequential steps are involved in the ultimate development of a final approved study plan for the program of studies to support AEA's license application. These steps include the initial identification of issues and study needs in this PAD, consideration of information or study requests from licensing participants in response to the PAD and Scoping Document 1 (SD1), development of the Proposed Study Plan (PSP), development of the Revised Study Plan (RSP) in response to comments to the PSP, and FERC's final Study Plan Determination and approval. Details regarding the timing of these activities are included in Section 2.2.

Comments on the PAD and SD1, including information and study requests, must be received within 60 days following the Commission's notice of commencement of this licensing proceeding and issuance of SD1. As required by section 5.9 of the ILP regulations, any information or study request must:

- 1) Describe the goals and objectives of each study proposal and the information to be obtained;
- 2) If applicable, explain the relevant resource management goals of the agencies or Alaska Natives with jurisdiction over the resource to be studied;
- 3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study;
- 4) Describe the existing information concerning the subject of the study proposal, and the need for additional information;
- 5) Explain the nexus between project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements;

- 6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant Alaska Natives and knowledge; and
- 7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Within 45 days following the deadline for filing comments on the PAD and SD1, including information and study requests, AEA must file its PSP with the Commission. With respect to each proposed study, AEA's PSP must include:

- 1) A detailed description of the study and the methodology to be used;
- 2) A schedule for conducting the study;
- 3) Provisions for periodic progress reports, including the manner and extent to which information will be shared; and sufficient time for technical review of the analysis and results; and
- 4) If AEA does not adopt a requested study, an explanation of why the request was not adopted, with reference to the criteria set for in section 5.9(b) of the ILP regulations.

AEA's PSP must also:

- 1) Describe the goals and objectives of each study proposal and the information to be obtained;
- 2) Address any known resource management goals of the agencies or Alaska Native groups with jurisdiction over the resource to be studied;
- 3) Describe existing information concerning the subject of the study proposal, and the need for additional information;
- 4) Explain the nexus between project operations and effects (direct, indirect and/or cumulative) on the resource to be studied;
- 5) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers known Alaska Native interests; and
- 6) Describe considerations of level of effort and cost, as applicable.

Lastly, AEA's PSP must include provisions for initial and updated study reports and meetings.

AEA's PSP, when filed with the Commission, will be accompanied by a proposal to conduct a study plan meeting(s) within the first 30 days of the 90-day comment period on the PSP for the purpose of clarifying AEA's PSP and any initial information gathering or study requests, and to resolve any outstanding issues with respect to the PSP. Other meetings may also be scheduled within these timelines to resolve issues pertaining to the study plan.

Comments on AEA's PSP, including any revised information gathering or study requests, must be filed with the Commission by the end of the 90-day comment period. Any comments must

include an explanation of any study plan concerns and any accommodations reached with AEA regarding those concerns.

Within 30 days of the deadline for filing comments on the PSP, AEA will file its Revised Study Plan (RSP) for FERC approval. The RSP must include comments on the PSP and a description of the efforts made to resolve differences over study requests. If AEA does not adopt a requested study, it must explain why the request was not adopted, with reference to the criteria in section 5.9(b) of the ILP regulations. Licensing participants may file comments on the RSP within 15 days following its filing. Within 30 days of the RSP filing, the Director of Energy Projects will issue a Study Plan Determination, including any modifications determined to be necessary in light of the record.

If no notice of study dispute is filed within 20 days of the Study Plan Determination, the study plans shall be deemed approved and AEA will proceed with their implementation. The steps associated with study plan dispute resolution (if needed) are outlined in section 5.14 of the ILP regulations.

As described in the approved study plan and schedule, AEA will prepare and file no later than one year after the study plan approval, an Initial Study Report (ISR) describing its overall progress in implementing the study program, and the data collected, including an explanation of any variance from the study plan and schedule. The report must also include any modifications to ongoing studies or new studies proposed by AEA. AEA may present interim results to Participants.

Within 15 days following the filing of the ISR, AEA will hold a meeting with licensing Participants and FERC staff to discuss the study results to date and AEA's or other Participants' proposals, if any, to modify the study plan in light of the progress of the study plan and data collected. Following the issuance of the meeting summary, there is an opportunity to file disagreements and proposals to modify ongoing studies or propose new studies. Following additional opportunity for responses, the Director of Energy Projects will resolve any outstanding disagreements and amend the approved study plan, as appropriate.

Criteria for modification of an approved study or for requiring a new study are found in section 5.15(d) and (e) of the ILP regulations.

AEA will also file an Updated Study Report (USR) no later than two years after the approval of the study plan. The USR will describe the overall progress in implementing the study program and the data collected, including an explanation of any variance from the study plan and schedule. The report must also include any modifications to ongoing studies or new studies proposed by AEA. The review, comment and disagreement resolution provisions that apply to the ISR also apply to the USR. AEA must promptly proceed to complete any remaining undisputed information gathering or studies under its proposed amendments to the study plan, if any, and must proceed to complete any information gathering or studies that are the subject of a disagreement upon the Director of Energy Project's resolution of the disagreement.

AEA intends for the work groups discussed in section 2.4 of this PAD to assist with the implementation of the study program, including development of information gathering and study

requests, participation in study plan meeting(s), and review of comments on the PSP. In this regard it is AEA's intent to minimize the need for use of the formal study dispute resolution process available in the ILP regulations.

AEA also plans to utilize the work group structure during the review of the ISR and USR, including the required study report meetings.