

# Development Barriers for New Hydroelectric Projects



## **The Integrated Licensing Process does not match the three-year term of a Preliminary Permit**

**Issue:** The standard pre-filing process is longer than the term of a preliminary permit. This situation places the permit holder at risk of filing an original license application after the expiration of their permit. Without permit based priority, the former permit holder risks losing the project if a municipality files a competitive application regardless of whether the former permit holder is still engaged in the ILP process. This situation is actively discouraging new private investment in hydropower.

### **Possible Solutions:**

- » An accelerated ILP schedule for original licenses
- » Increasing the term of the preliminary permit

## **Increased licensing costs due to the ILP being the default licensing process for original projects**

**Issue:** Resource agencies and other stakeholders often view original license applications and early portions of the ILP process as more speculative than re-licenses and choose not to participate until the development of the study plan. Even if they do participate early on, a number of the ILP steps are viewed as redundant. While an applicant is responsible for bearing the costs of all of the benchmarks in the process, stakeholders and agencies with conditioning authority can reduce their activity to a few key steps.

### **Possible Solutions:**

- » Elimination of the ILP as the default licensing process for original licenses.
- » Condensing portions of the ILP process to encourage additional stakeholder participation
  - Filing of a draft study plan at the same time as the NOI and PAD
  - Filing a PLP at the same time as the first year study report

## **Untimely response from resource agencies with mandatory conditioning authority**

**Issue:** Unauthorized delays in excess of 24 months are not uncommon for biological opinions and recommendations from resource agencies with mandatory conditioning authority. This discourages new investment in hydropower when other forms of renewable energy often require little if any resource agency oversight.



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Symbiotics LLC has been developing low-impact hydroelectric projects to meet growing demand for renewable energy since 2001. Symbiotics specializes in retrofit run-of-river and closed loop pumped storage projects. The company headquarters are located in Logan, Utah with additional offices in Idaho, Texas, and Oregon. The results of the company's current efforts include three run-of-river hydroelectric projects in operation; three new FERC licenses for run-of-river projects, with one to be issued in 2009; and a total of 36 new run-of-river projects and 12 pumped storage projects in the FERC licensing process.