



**NOVEMBER 21, 2025**

Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Subject: Request for Extension of Comment Period – Potter Valley Hydroelectric Project –  
Project No. 77-332

To Whom It May Concern:

I write this letter on behalf of the America First Policy Institute (“AFPI”). AFPI is a 501(c)(3) non-profit, non-partisan research institute dedicated to advancing policies that put the American people, including our farmers and ranchers, first. Its guiding principles are liberty, free enterprise, the rule of law, America-first foreign policy, and a belief that American workers, families, and communities are the key to our country’s success. AFPI’s leadership and alumni include many current and former leaders of the United States government. AFPI’s leaders and members alike know that the American farmers and ranchers are the backbone of our country and advocates for their best interests. To that end, AFPI respectfully requests an extension of the public comment period for Potter Valley Hydroelectric Project – Project No. 77-332.

For more than 100 years, the Potter Valley Hydroelectric Project has provided reliable electricity and water to over 750,000 residents. The Pacific Generation & Electric Company (P&E)’s proposed decommissioning of its Scott and Cape Horn Dams and related facilities would create unavoidable adverse effects to these local and regional communities, and threatens access to a much-needed water supply for California agricultural purposes.

We respectfully request an extension of the current comment period deadline by 90 days from **December 1, 2025**, to **February 28, 2026**. This additional time would allow for:

- **Additional comments from other federal agencies.** Forty-three days of the current comment period overlapped with the 2025 federal government shutdown and funding lapse. Due to furloughs and the temporary suspension of routine operations, several federal agencies with equities in the project may not have had adequate time to review the proposed project. Further, the proposed project saw significant development during a period of presidential transition. New federal officials typically benefit from



additional time to review such projects, and their time was likely even further constrained by the recent government shutdown.

- **More meaningful contributions from Federal Energy Regulatory Commission (FERC).** FERC has recently undergone leadership changes, including the appointment of new leadership as recently as October 2025. Additional time would allow for new leadership to become fully informed about the proposed project and its implications to the local community, including farmers and ranchers.
- **Additional comments from affected farmers and ranchers.** The current comment period has coincided with peak harvest season. Many producers therefore received late notice, significantly limiting their ability to participate.
- **More meaningful stakeholder engagement from FERC.** We are concerned that impacted agricultural stakeholders may be unfamiliar with FERC's administrative processes and that engagement to date has been largely one-sided with the project proponent. We therefore encourage FERC to proactively reach out to the community to fully understand the local and regional impacts of decommissioning the dams.
- **More meaningful comments by avoiding a deadline during the holiday season.** Allowing time after the holiday season will help ensure that more stakeholders are able to honor commitments to faith and family, while also having sufficient time to dedicate to formulating and providing meaningful comments.

A 90-day comment period extension is therefore warranted and would undoubtedly provide for a more informed and transparent decision-making process.

Thank you for your consideration of this request.

Sincerely,

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