

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

In Re: ) Project No. 77-332  
 )  
Potter Valley Hydroelectric Project )

MOTION TO INTERVENE OF THE COUNTY OF LAKE

Introduction

The County of Lake hereby moves to intervene in this proceeding. The County of Lake meets the requirements of FERC Rule 214, subdivision (b), which provides:

- (1) Any motion to intervene must state, to the extent known, the position taken by the movant and the basis in fact and law for that position.
- (2) A motion to intervene must also state the movant's interest in sufficient factual detail to demonstrate that:
  - (i) The movant has a right to participate which is expressly conferred by statute or by Commission rule, order, or other action;
  - (ii) The movant has or represents an interest which may be directly affected by the outcome of the proceeding; or
  - (iii) The movant's participation is in the public interest.

Description of Intervenor

The County of Lake is a political subdivision of the State of California. The provisions for the government of California counties are contained in the California Constitution and the California Government Code. A county is the largest political subdivision of the state having corporate powers. It is vested by the Legislature with the powers necessary to provide for the health, safety, and welfare of the people within its borders. Located in Northern California, Lake County is home to Clear Lake, the largest, natural freshwater lake in California with 68 square miles of surface area. There are three major watersheds in the County: Cache Creek, Putah Creek and Eel River. Agriculture is the predominant industry in the County, including the Lake Pillsbury Area formed by Scott

Dam. Other prominent industries include tourism/hospitality and outdoor recreation, which is found large part in the Lake Pillsbury Area.

County of Lake's Interest in this Proceeding

It is well known that the significance of the Potter Valley Project must be measured by more than simply the generation of power. The value of the water supply generated by the Project for those who live down river is very important. That water supply is necessary for water users and fish in the Eel River, as well as the ecosystem, agriculture, and recreation in Lake, Mendocino, Humboldt and Sonoma Counties.

The County of Lake also has an interest in matters relating to Potter Valley Project flows. Pacific Gas and Electric and its predecessors created Lake Pillsbury on the Eel River as part of its Potter Valley Project. Located on the Upper Lake Ranger District in Lake County, this lake has 31 miles of shoreline. Fishing, boating, sailing and waterskiing are popular activities. The County of Lake is a party to and has participated in Commission proceedings under Project Nos. 77-000, 77-275, 77-285, 77-298, and 77-320. In light of recent developments and filings this year related to Pacific Gas & Electric's (PG&E) proposed decommissioning plan, the County of Lake has filed this motion to retain and ensure its party status for the aforementioned project no. 77-332.

Lake County residents have repeatedly faced the horrors of wildfires and the County has lost 60% of its land mass due to wildfire. Through its Final Surrender Application and Final Non-Project Use of Project Lands Application for the Potter Valley Hydroelectric Project; FERC No. P-77 (hereinafter, "Application"), P&E proposes to significantly reduce the one resource that can extinguish these horrors. There are no comparable alternate sources for additional water. The proposed decommissioning plan would result in the substantial depletion of a large reservoir of water in an area heading towards a high fire fuel growth

season for this year and beyond.

Before any measures, interim or long-term, are approved, there should be an extensive analysis of the Application's adverse impacts towards Lake County residents, including residents of Lake Pillsbury, where Scott Dam is located. The adverse environmental and economic impacts referenced in this Application should not be imposed upon the County of Lake.

Contact Information

The County of Lake requests that all communications and service in this matter be directed as follows:

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Conclusion

For the reasons set forth above, the County of Lake requests that the Commission grant its motion to intervene in order to take into consideration the County of Lake's comments to the decommissioning plan submitted by PG&E.

Dated: November 19, 2025      Respectfully submitted,

/S/ Lloyd C. Guintivano  
Lloyd C. Guintivano  
County Counsel County of Lake

CERTIFICATE OF SERVICE

I hereby certify that the Motion to Intervene of the County of Lake has been served upon each person designated on the attached official P-77-000 service list compiled by the Commission in this proceeding via electronic mail or first-class mail.

Dated this 19th day of November, 2025

/S/ Lloyd C. Guintivano

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