

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

In Re: ) Project Nos. 77-000; 77-332  
 )  
Potter Valley Hydroelectric Project )

COUNTY OF LAKE’S MOTION FOR EXTENSION OF TIME TO FILE PROTEST AND  
COMMENTS

The County of Lake (“County”) respectfully requests that the Federal Energy Regulatory Commission (“Commission”) extend the deadline set forth in its October 31, 2025, “Notice of Application for Surrender of License and Non-Project Use of Project Lands, Accepted for Filing, Soliciting Comments, Motions to Intervene, and Protests” (“Notice”) in proceeding no. 77-332, in which Pacific Gas & Electric Company is seeking to surrender the existing license for the Potter Valley Hydroelectric Project. In accordance with Rules 212 and 2008 of the Commission’s Rules of Procedure, County requests that the Commission extend the deadline for comments, motions to intervene, and protests for good cause shown, as demonstrated below.

On October 31, 2025, the Commission filed its Notice, which sets a 31-day deadline for any person or entity to file of comments, motions to intervene, and protests in response to PG&E’s Final Surrender Application and Final Non-Project Use of Project Lands Application for the Potter Valley Hydroelectric Project; FERC No. P-77 (“Application”). Rule 385.214(c) of the Commission’s Rules of Procedure expressly states:

- (1) If no answer in opposition to a timely motion to intervene is filed within 15 days after the motion to intervene is filed, the movant becomes a party at the end of the 15 day period.

(2) If an answer in opposition to a timely motion to intervene is filed not later than 15 days after the motion to intervene is filed or, if the motion is not timely, the movant becomes a party only when the motion is expressly granted.

In lieu of the option to file motions to intervene at least fifteen (15) days prior to the December 1, 2025 deadline to file protests and comments, any file is now compelled to file any of the aforementioned documents without regard to the fifteen (15) day opposition period under rule 385.215(c) of the Commission's Rules of Procedure. The December 1, 2025 deadline eliminates the option of filing the motion to intervene without filing comments in this proceeding.

In fact, County filed its motion to intervene in proceeding no. 77-332 on November 19, 2025, as it needed approximately two (2) weeks to review the Notice and to obtain County of Lake Board of Supervisors approval to file the motion to intervene in compliance with the Brown Act (California Government Code Sections 54950, et. seq.). Because of the December 1, 2025 deadline, County would be compelled to file its protest and / or comments at least fifteen (15) days before December 1, 2025 and wait for a determination of its intervenor status. Even if an individual or entity filed a motion to intervene on October 31, 2025 (the same day as the filed Notice), the filer with intervenor status would only have ten (10) business days to file its protest and comments in response to PG&E's 2,324-page Application.

### Conclusion

For the reasons set forth above and because the County has met the requirements set out in 18 C.F.R. Section 385.2008 to demonstrate good cause, County respectfully requests that the Commission extend the deadline to file protest and / or comments in this proceeding to January 31, 2026. Granting said extension would provide more time for any filers who may be working through motions, protests, or comments through federally

recognized holidays in November and December, and it would allow potential intervenors in this proceeding the option on whether the file said protests and comments after intervention is granted under Rule 385.214(c) of the Commission's Rules of Procedure.

Dated: November 21, 2025

Respectfully submitted,

/S/ Lloyd C. Guintivano

Lloyd C. Guintivano

County Counsel County of Lake

CERTIFICATE OF SERVICE

I hereby certify that the County Of Lake's Motion For Extension Of Time To File Protest And Comments 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 21<sup>st</sup> day of November, 2025

/S/ Lloyd C. Guintivano

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