

March 11, 2020

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

Re: Application for Preliminary Permit
Navajo Nation (NN) Big Canyon (BC) Pumped Storage Project (PSP)
FERC Project No._____

Dear Secretary Bose:

Pursuant to 18 CFR §§ 4.32 and 4.81 of the Federal Energy Regulatory Commission's (FERC) regulations, please find enclosed Pumped Hydro Storage LLC's "Application for Preliminary Permit" for the proposed Navajo Nation (NN) Big Canyon (BC) Pumped Storage Project (PSP). The proposed Project is a 3,600 MW PSP located about 23 miles west of Tuba City, Arizona. The Project is entirely on Navajo Nation land, and the project is a closed-loop pumped storage project.

The Project will involve the construction of new water storage, water conveyance, power generation facilities, a tunnel access road, and primary transmission lines. The project will alleviate the stress being placed on the Southwest electrical generating system due to renewable energy and will provide other benefits stated in our application.

Please call the undersigned if you have any questions or need additional information for the application.

With Regards,

Steve W. Irwin

Manager, Pump Hydro Storage LLC

VERIFICATION STATEMENT

This application for preliminary permit is executed in -

State of:

Arizona

County of:

Maricopa

By:

Steve Irwin

Pumped Hydro Storage LLC

6514 S 41st Lane Phoenix, AZ 85041 (602) 696-3608

Swirwin7@gmail.com

Being duly sworn, deposes and says that the contents of this Preliminary Permit Application are true to the best of his knowledge or belief. The undersigned Applicant has signed the application on this //// day of March 2020.

Applicant -

PUMPED HYDRO STORAGE LLC

Rv.

Steve Irwin, Manager

Venue Stock

Subscribed and sworn to before me, a Notary Public of the State of Arizona this <u>//4/4</u> day of March 2020.

Notary:

PAMELA T KOHLBECK Notary Public - Arizona Maricopa County Commission # 551962 My Comm. Expires Aug 5, 2022

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION APPLICATION FOR PRELIMINARY PERMIT

Navajo Nation (NN)
Big Canyon (BC)
Pumped Storage Project (PSP)
Project No. _____

Pumped Hydro Storage LLC 6514 S 41st Lane Phoenix, AZ 85041 (602) 696-3608

March 11, 2020

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INITIAL STATEMENT

Pursuant to 18 CFR §4.81, each application for a preliminary permit must include the following initial statement and numbered exhibits containing the information and documents specified:

(a) Initial statement:

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Application for Preliminary Permit

- (1) Pumped Hydro Storage LLC (Applicant) applies to the Federal Energy Regulatory Commission (FERC or Commission) for a preliminary permit for the proposed Navajo Nation (NN) Big Canyon (BC) Pumped Storage Project (the "Project"), as described in the attached exhibits. This application is made in order that the applicant may secure and maintain priority of application for a license for the Project under Part I of the Federal Power Act while obtaining the data and performing the acts required to determine the feasibility of the project and to support an application for a license.
- (2) The location of the proposed project is:

State or territory: Arizona
County: Coconino

Township or nearby town: Tuba City, Arizona

Stream or body of water: Big Canyon Wash near Little Colorado River

(3) The exact name, business address, and telephone number of the applicant are:

Pumped Hydro Storage LLC 6514 S 41st Lane Phoenix, AZ 85041 (602) 696-3608

The exact name and business address of each person authorized to act as agent for the applicant in this application are:

Steve Irwin Justin Rundle, PE, CEM, CCM

Manager Member

Pumped Hydro Storage LLC Pumped Hydro Storage LLC

6514 S 41st Lane
Phoenix, AZ 85041
Phoenix, AZ 85041
Phoenix, AZ 85041
(602) 696-3608
(602) 300-7242

Swirwin7@gmail.com <u>Justin Rundle@yahoo.com</u>

- (4) Pumped Hydro Storage LLC is a limited liability company organized and existing under the law of the State of Arizona and is not claiming preference under Section 7(a) of the Federal Power Act.
- (5) The proposed term of the requested permit is 36 months.
- (6) If there is any existing dam or other project facility, the applicant must provide the name and address of the owner of the dam and facility. If the dam is federally owned or operated, provide the name of the agency.

There are no existing dams or other Project facilities that will be used for the proposed Project.

INFORMATION REQUIRED BY 18 CFR §4.32(a)

(1) For a preliminary permit or license, identify every person, citizen, association of citizens, domestic corporation, municipality, or state that has or intends to obtain and will maintain any proprietary right necessary to construct, operate, or maintain the project:

Navajo Nation Office of the President 100 Parkway, PO Box 7440 Window Rock, AZ 86515 Pumped Hydro Storage LLC 6514 S 41st Lane Phoenix, AZ 85041

Department of the Interior Bureau of Indian Affairs 1849 C Street, N.W. Washington DC 20240

- (2) For a preliminary permit or a license, identify (providing names and mailing addresses):
 - (i) Every county in which any part of the project, and any Federal facilities that would be used by the project, would be located:

Coconino County James Jayne County Manager 219 E. Cherry Ave. Flagstaff, AZ 86001

- (ii) Every city, town, or similar local political subdivision:
 - (A) In which any part of the project, and any Federal facilities that would be used by the project, would be located:

None.

(B) That has a population of 5,000 or more people and is located within 15 miles of the project dam:

None.

- (iii) Every irrigation district, drainage district, or similar special purpose political subdivision:
 - (A) In which any part of the project, and any Federal facilities that would be used by the project, would be located:

None.

(B) That owns, operates, maintains, or uses any project facilities or any Federal facilities that would be used by the project:

None.

(iv) Every other political subdivision in the general area of the project that there is a reason to believe would likely be interested in, or affected by, the application:

Navajo Nation Office of the President 100 Parkway, PO Box 7440 Window Rock, AZ 86515

Grand Canyon National Park Supervisor's Office P.O. Box 129 Grand Canyon, AZ 86023

Arizona Corporation Commission Utilities Division 1200 W Washington Street Phoenix, AZ 85007

Salt River Project (SRP) 1521 N Project Drive Tempe, AZ 85281 Arizona Public Service 400 N 5th Street Phoenix, AZ 85004

WAPA P.O. Box 6457 Phoenix, AZ 85009

LADWP 111 N Hope Street Los Angeles, CA 90012

NV Energy 6226 W. Sahara Ave. Las Vegas, NV 89146

(v) All Indian tribes that may be affected by the project.

Navajo Nation Office of the President 100 Parkway, PO Box 7440 Window Rock, AZ 86515

EXHIBIT 1 - DESCRIPTION OF THE PROPOSED PROJECT

18 CFR §4.81(b) Exhibit 1 must contain a description of the proposed project, specifying and including, to the extent possible:

(1) The number, physical composition, dimensions, general configuration and, where applicable, age and condition, of any dams, spillways, penstocks, powerhouses, tailraces, or other structures, whether existing or proposed, that would be part of the project:

The Project will be located entirely on Navajo Nation lands. The information requested in this section is summarized shown below and in Exhibits 3-1 and 3-2 –

Line	Description	Value
1	Dams - Number	4
2	Lower Dam - Physical composition	Concrete arch
3	Lower Dam - Dimensions	600 ft x 400 ft high
4	Lower Dam Spillway - Composition	Concrete tunnel
5	Lower Dam Spillway - Dimension	Internal to Powerhouse
6	Upper West Dam #1 - Physical comp	Concrete arch
7	Upper West Dam #1 - Dimensions	450 ft x 200 ft high
8	Upper West Dam #1 Spillway	None
9	Upper Middle Dam - Physical comp	Earth filled
10	Upper Middle Dam - Dimensions	1,000 ft x 150 ft high
11	Upper Middle Dam Spillway	None
12	Upper East Dam - Physical comp	Concrete arch
13	Upper East Dam - Dimensions	10,000 ft x 200 ft high
14	Upper East Dam Spillway	None
15	Penstocks - Number	3
16	Penstocks - Physical composition	Reinforced concrete
17	Penstocks - Dimensions	10,000 ft x 30 ft dia.
18	Powerhouses - Number	1
19	Powerhouses - Physical composition	Reinforced concrete
20	Powerhouses - Dimensions	1,100' L x 160' W x 140' H
21	Tailraces - Number	1
22	Tailraces - Physical Composition	Reinforced concrete
23	Tailraces - Dimension	1,000' L x 120' W x 40' H
24	Roadway Access Tunnel - Composition	Natural Rock / Concrete
25	Roadway Access Tunnel - Dimensions	11,000 ft x 30 ft dia.
26	Number of wells to supply water	3 x 700 hp
27	Well water supply pipeline	1,800 ft x 36" dia.

(2) The estimated number, surface area, storage capacity, and normal maximum surface elevation (mean sea level) of any reservoirs, whether existing or proposed, that would be part of the project:

The Project will consist of one new lower and three new upper reservoirs with characteristics shown below and in Exhibits 3-1 and 3-2 -

Line	Description	Value	Units
1	Lower Reservoir		
2	Number		1
3	Surface Area	260	acres
4	Storage Capacity	44,000	ac-ft
5	Max Surface Elev.	3,790	ft amsl
6	Upper Reservoirs		
7	Number	3	3
8	Combined Surface Area	400	acres
9	Storage Capacity	29,000	ac-ft
10	Max Surface Elev.	5,390	ft amsl

(3) The estimated number, length, voltage, interconnections, and, where applicable, age and condition, of any primary transmission lines whether existing or proposed, that would be part of the project:

As shown in Exhibit 3-1, the project will require two new double circuit 500 kV electric transmission lines from the project switchyard near the proposed powerhouse to the existing 500 kV and 345 KV transmission lines located 14 miles east of the Project. New switchyards will be built at the powerhouse and near the existing transmission lines located 14 miles east of the project. The length of the proposed transmission lines is 16 miles.

(4) The total estimated average annual energy production and installed capacity (provide only one energy and capacity value), the hydraulic head for estimating capacity and energy output, and the estimated number, rated capacity, and, where applicable, the age and condition, of any turbines and generators, whether existing or proposed, that would be part of the project works:

The turbine-generator and energy production information are –

Line	Description	Value	Units
1	Est. annual energy	7,900	GWhr
2	Installed capacity	3,600	MW
3	Hydraulic head	1,550	feet
4	Energy output	3,600	MW
5	Energy storage	36,000	MWhr
6	Turbine-Generators		
7	Туре	Pum	ping
8	Number	9	9
9	Rated capacity	400	kW

(5) All lands of the United States that are enclosed within the proposed project boundary described under paragraph (d)(3)(i) of this section, identified and tabulated on a separate sheet by legal subdivisions of a public land survey of the affected area, if available. If the project boundary includes lands of the United States, such lands must be identified on a completed land description form (FERC Form 587), provided by the Commission. The project location must identify any Federal reservation, Federal tracts, and townships of the public land surveys A copy of the form must also be sent to the Bureau of Land Management state office where the project is located:

No public lands will be used for this project.

(6) Any other information demonstrating in what manner the proposed project would develop, conserve, and utilize in the public interest the water resources of the region:

The proposed project will develop, conserve, and utilize water resources to benefit the public by –

- Reducing the "duck curve" that is developing for energy demand due to renewable energy sources
- Promoting green, renewable power by providing a means to store energy
- Reducing our carbon footprint by providing a means to store excess energy or energy produced by nuclear power
- Providing approximately \$7 B in investment to create jobs and stimulate the Navajo Nation and Arizona economy
- Increasing electrical distribution system reliability and resiliency
- Adding peaking capacity available in 15 minutes for emergencies
- Reducing thermal generation reserve requirements
- Reducing electrical pricing volatility by balancing energy consumption
- Providing a paved road from Highway 89 to the project, promoting the Navajo Nation resources by making this area more accessible to the community
- Providing potable water and electric to a remote location on the Navajo Nation lands
- The project location is remote and cannot be seen by the public from any roads

EXHIBIT 2 - DESCRIPTION OF PROPOSED STUDIES

18 CFR §4.81(c) Exhibit 2 is a description of studies conducted or to be conducted with respect to the proposed project, including field studies. Exhibit 2 must supply the following information:

- (1) General requirement. For any proposed project, a study plan containing a description of:
 - (i) Any studies, investigations, tests, or surveys that are proposed to be carried out, and any that have already taken place, for the purposes of determining the technical, economic, and financial feasibility of the proposed project, taking into consideration its environmental impacts, and of preparing an application for a license for the project:

Studies the Applicant proposed to initiate include –

- 1) Engineering feasibility and economic studies to confirm the feasibility of the project.
- 2) Water supply studies to confirm water is available to fill the reservoir and to maintain the water lost thru evaporation.
- 3) Geotechnical studies to confirm the geology and sub-surface conditions at the upper reservoirs, lower reservoir, and powerhouse.
- 4) Environmental studies to identify if any rare, endangered, or threatened species are affected by the project implementation.
- 5) Cultural and tribal studies to confirm if the project would impact cultural or tribal resources.
- (ii) The approximate locations and nature of any new roads that would be built for the purpose of conducting the studies:

No new roads will be built to conduct any of the proposed studies - access to the lower reservoir for studies will be by jeep, hiking or helicopter.

- (2) Work plan for new dam construction. For any development within the project that would entail new dam construction, a work plan and schedule containing:
 - (i) A description, including the approximate location, of any field study, test, or other activity that may alter or disturb lands or waters in the vicinity of the proposed project, including floodplains and wetlands; measures that would be taken to restore the altered or disturbed areas:

Geotechnical studies at the dams, reservoirs, and tunnel locations will be conducted by borehole drilling samples and test pits. Measures will be taken to avoid or minimize disturbance at the drilling locations, and test pits will be backfilled to return the site as much as possible to natural. The methods to mitigate disturbances will be coordinated with the Navajo Nation Council. (ii) A proposed schedule (a chart or graph may be used), the total duration of which does not exceed the proposed term of the permit, showing the intervals at which the studies, investigations, tests, and surveys, identified under this paragraph are proposed to be completed.

The Applicant will require three years (36 months) to conduct studies and submit the final pre-application document (PAD) and notice of intent (NOI). The proposed schedule for the project –

	Start	End
	Month	Month
Task 1 – Continue with engineering feasibility study	0	36
Task 2 – Meet with the Navajo Nation for discussions	0	12
Task 3 – Environmental, cultural, and tribal studies	12	34
Task 4 – Geotechnical and water supply studies	12	34
Task 5 – Engineering design with economic studies	24	36
Task 6 – Organize PAD / NOI	34	36
Task 7 – Submit PAD / NOI application	36	36

(3) Waiver. The Commission may waive the requirements of paragraph (c)(2) pursuant to 18 CFR §385.207 of this chapter, upon a showing by the applicant that the field studies, tests, and other activities to be conducted under the permit would not adversely affect cultural resources or endangered species and would cause only minor alterations or disturbances of lands and waters and that any land altered or disturbed would be adequately restored.

The Applicant does not intend to apply for a waiver for the requirements of 18 CFR §4.81(c)(2) pursuant to 18 CFR §385.207.

- (4) Exhibit 2 must contain a statement of costs and financing, specifying and including, to the extent possible:
 - (i) The estimated costs of carrying out or preparing the studies, investigations, tests, surveys, maps, plans or specifications identified under paragraph (c) of this section:
 - The Applicant anticipates that the costs to develop the project and perform the studies, investigations, tests, surveys, maps, plans or specifications will be approximately \$10,000,000 to \$20,000,000.
 - (ii) The expected sources and extent of financing available to the applicant to carry out or prepare the studies, investigations, tests, surveys, maps, plans, or specifications identified under paragraph (c) of this section.

The expected sources to prepare the studies, plans, and specifications will be from Project partners that have yet to be identified. The plan for full Project financing will be developed during the course of the feasibility studies planned during the term of the preliminary permit.

EXHIBIT 3 - PROJECT MAP

18 CFR §4.81(d) Exhibit 3 must include a map or series of maps, to be prepared on graphic quadrangle sheets or similar topographic maps of a State agency, if available. The maps must show.

- (1) The location of the project as a whole with reference to the affected stream or other body of water and, if possible, to a nearby of water and, if possible, to a nearby town or any permanent monuments or objects that can be noted on the maps and recognized in the field:
- (2) The relative locations and physical interrelationships of the principal project features identified under paragraph (b) of this section:
- (3) A proposed boundary for the project, enclosing:
 - (i) All principal project features identified under paragraph (b) of this section, including but not limited to any dam, reservoir, water conveyance facilities, powerplant, transmission lines, and other appurtenances; if the project is located at an existing Federal dam, the Federal dam and impoundment must be shown, but may not be included within the project boundary;

Any non-Federal lands and any public lands or reservations of the United States necessary for the purposes of the project. To the extent that those public lands or reservations area covered by a public land survey, the project boundary must enclose each of an only the smallest legal subdivisions (quarter-quarter section, lots or other subdivisions, identified on the map by subdivision) that may be occupied in whole or in part by the project.

Exhibit 3-1 presents the general location of the Project and the project features not shown in Exhibit 3-2. Exhibit 3-2 presents the project boundary and detailed conceptual features.

(4) Areas within or in the vicinity of the proposed project boundary which are included in or have been designated for study for inclusion in the National Wild and Scenic Rivers System:

None.

(6)

- (5) Areas within the project boundary that, under the provisions of the Wilderness Act, have been:
 - (i) Designated as wilderness area;
 - (ii) Recommended for designation as wilderness area; or
 - (iii) Designated as wilderness study area.

None.

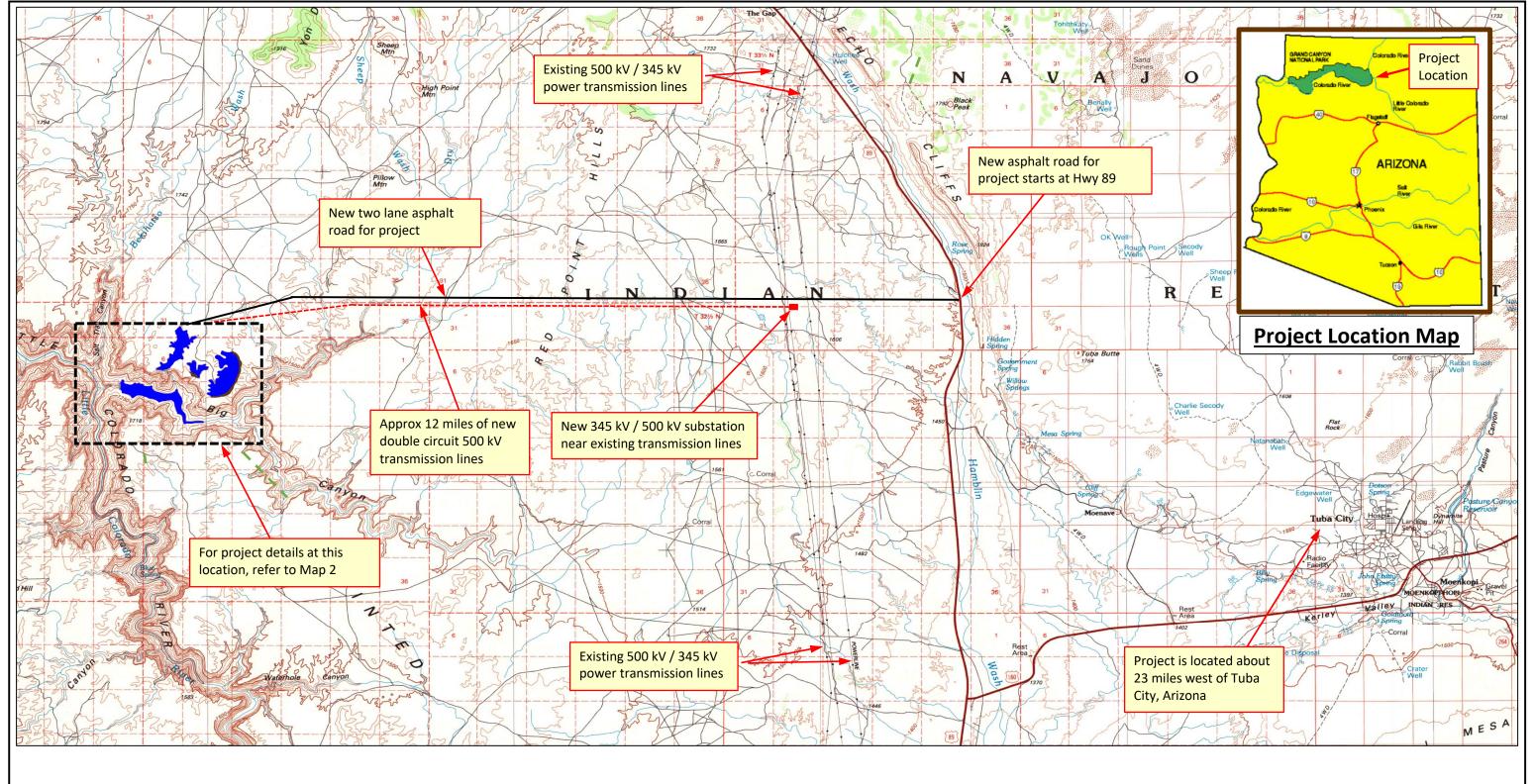
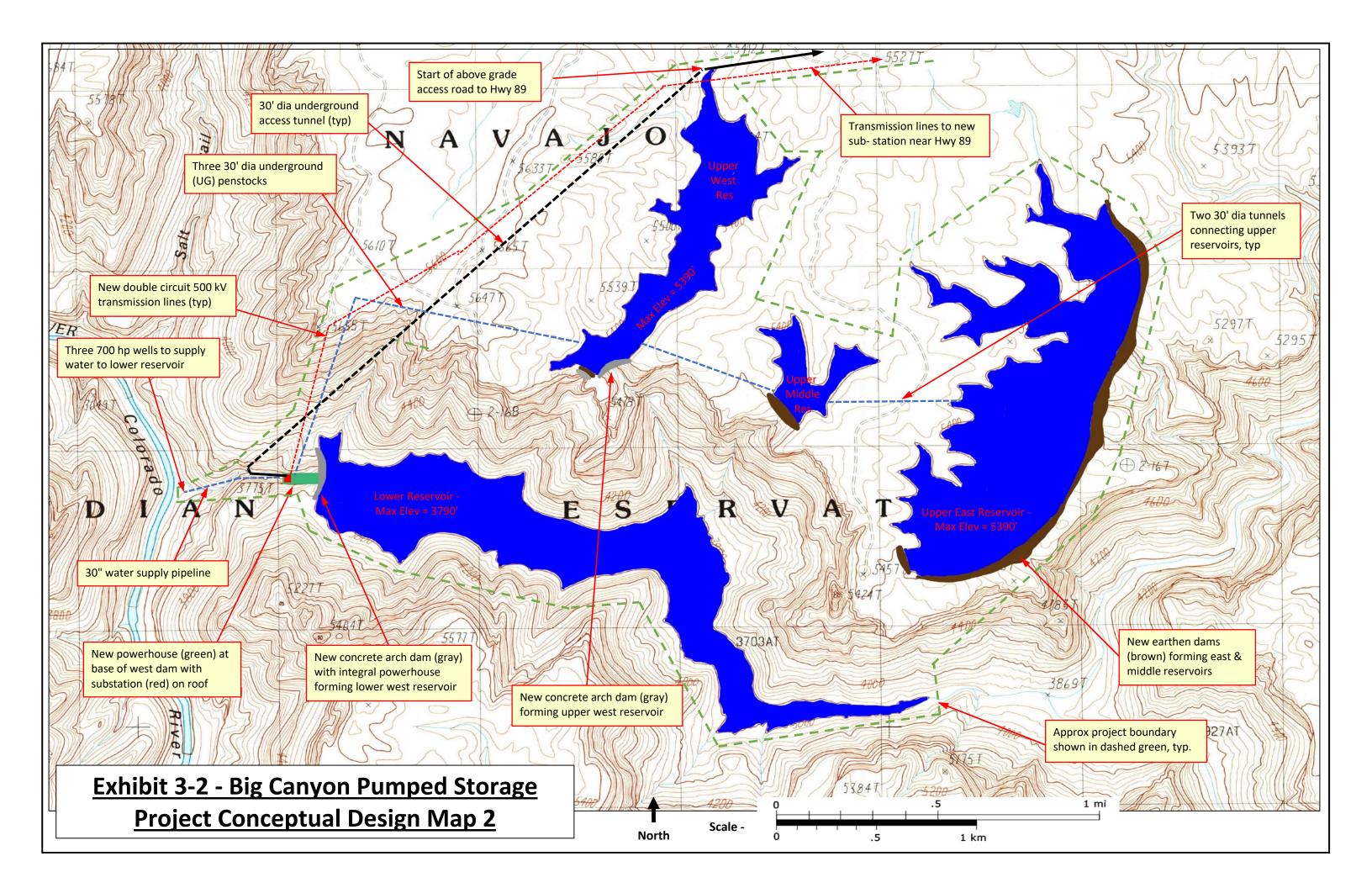


Exhibit 3-1 - Big Canyon Pumped Storage Project Conceptual Design Map 1



Notes -

- 1. The improvements shown above are entirely within the Navajo Nation (NN) boundaries.
- 2. Project will be closed loop and will not significantly affect Little Colorado River fisheries.
- 3. New roads and utilities at project area will promote Little Colorado River development and tourism.
- 4. Project investment estimated at \$5 B will stimulate Arizona and local growth and development.
- 5. Project will employ about 2,000 people during construction and 100 people during operations.



Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJ	ECT NO.: Not applicable
3. TOWNSHIP: <i>T32N</i>	4. RANGE: R6E	5. MERIDIAN: Gila & Salt Rive
6. Check one:	Check one:	
License _X_Preliminary Permit		Pending Issued

If preliminary permit is issued, give expiration date: Not applicable

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
					Exhibit 3-1
7	8	9	10	11	12
					Exhibit 3-1
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

8. Contact: Steve Irwin

Pumped Hydro Storage LLC

(602) 696-3608 <u>Swirwin7@gmail.com</u> Submitted on 10 Mar 20

Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJ	ECT NO.: <i>Not applicable</i>
3. TOWNSHIP: <i>T32N</i>	4. RANGE: R7E	5. MERIDIAN: Gila & Salt River
6. Check one:	Check one:	
License _X_Preliminary Permit		_X_Pending Issued

If preliminary permit is issued, give expiration date: Not applicable

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
Exhibit 3-1	Exhibit 3-1	Exhibit 3-1	Exhibit 3-1		
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Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJ	ECT NO.: <i>Not applicable</i>
3. TOWNSHIP: T32.5N	4. RANGE: R6E	5. MERIDIAN: Gila & Salt River
6. Check one:	Check one:	
License _X_Preliminary Permit		Pending Issued

If preliminary permit is issued, give expiration date: Not applicable

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
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30	29	28	27	26	25
31	32	33	34	35	36
					Exhibit 3-1

8. Contact: Steve Irwin

Pumped Hydro Storage LLC

(602) 696-3608

Swirwin7@gmail.com Submitted on 10 Mar 20

Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJ	ECT NO.: Not applicable
3. TOWNSHIP: T3.52N	4. RANGE: R7E	5. MERIDIAN: Gila & Salt River
6. Check one:	Check one:	
License X Preliminary Permit		_X_Pending Issued

If preliminary permit is issued, give expiration date: Not applicable

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
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Exhibit 3-1					

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Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJI	ECT NO.: Not applicable
3. TOWNSHIP: <i>T32.5N</i>	4. RANGE: R8E	5. MERIDIAN: Gila & Salt River
6. Check one:	Check one:	
License X_Preliminary Permit		_X_Pending Issued

7. EXHIBIT SHEET NUMBERS OR LETTERS-

If preliminary permit is issued, give expiration date: Not applicable

Section 6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
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Exhibit 3-1					
31	32	33	34	35	36
Exhibit 3-1					

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Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJE	ECT NO.: Not applicable			
3. TOWNSHIP: <i>T33N</i>	4. RANGE: R7E	5. MERIDIAN: Gila & Salt Rive			
6. Check one:	Check one:				
License X Preliminary Permit		_X_Pending lssued			
If preliminary permit is issued, give expiration date: <i>Not applicable</i>					

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
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19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36
				Exhibit 3-1	Exhibit 3-1

8. Contact: Steve Irwin

Pumped Hydro Storage LLC

(602) 696-3608

Swirwin7@gmail.com Submitted on 10 Mar 20

Form FERC-587 OMB No. 1902-0145 (Expires 10/31/2018)

LAND DESCRIPTION

Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJECT NO.: Not applicable		
3. TOWNSHIP: <i>T33N</i>	4. RANGE: <i>R8E</i>	5. MERIDIAN: Gila & Salt River	
6. Check one:	Check one:		
License X Preliminary Permit		Pending Issued	
If preliminary permit is issued, gi	ve expiration date: Not applica	ble	

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
7	8	9	10	11	12
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Exhibit 3-1					

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Public Land States (Rectangular Survey System Lands)

1. STATE: Arizona	2. FERC PROJ	ECT NO.: <i>Not applicable</i>
3. TOWNSHIP: <i>T33N</i>	4. RANGE: R9E	5. MERIDIAN: Gila & Salt River
6. Check one:	Check one:	
License X_Preliminary Permit		_X_Pending Issued

If preliminary permit is issued, give expiration date: Not applicable

7. EXHIBIT SHEET NUMBERS OR LETTERS-

Section 6	5	4	3	2	1
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