

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Seattle City Light)	Project No. 2144-038
)	
Public Utility District No. 1 of Pend)	Project No. 2225-013
Oreille County, Washington)	

JOINT MOTION TO CONSOLIDATE

Pursuant to Rule 212 of the Federal Energy Regulatory Commission (“FERC” or “Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2009), and pursuant to Rule 602, 18 C.F.R. § 385.602(b)(3), Seattle City Light (“SCL”), the Public Utility District No. 1 of Pend Oreille County, Washington (“PUD”), and the other signatories to this motion (collectively, the “Joint Movants”) respectfully request that the Commission consolidate its proceedings on SCL’s application for a new license for the Boundary Hydroelectric Project No. 2144 (“Boundary Project”) and the PUD’s application for surrender of the license for the Sullivan Creek Project FERC No. 2225 (“Sullivan Creek Project”) and conduct one environmental analysis to support coordinated actions on the two applications.

Contemporaneously with this motion, SCL and the PUD are submitting an Offer of Settlement and Joint Explanatory Statement for (1) the settlement agreement package for the Boundary Project relicensing, and (2) the settlement agreement package for the Sullivan Creek Project license surrender.¹ As explained in Section II.B. of the Joint Explanatory Statement, consolidation of the proceedings for the Boundary relicensing and Sullivan Creek license

¹ The Joint Movants are the settlement agreement parties for both the Boundary Project relicensing and Sullivan Creek Project license surrender: SCL; PUD; Bureau of Indian Affairs (“BIA”); the National Park Service (“NPS”); the U.S. Fish and Wildlife Service (“USFWS”); the U.S. Forest Service (“USFS”); the Kalispel Tribe (“Tribe”); the Washington State Department of Fish and Wildlife (“WDFW”); the Washington State Department of Ecology (“Ecology”); the Selkirk Conservation Alliance (“SCA”); American Whitewater; The Lands Council; the Town of Cusick, Washington; Rick Larson; and Al Six.

surrender will permit FERC to (1) address the linkages between the proposed protection, mitigation, and enhancement (“PM&E”) measures contained in the Boundary Project settlement agreement and the proposed surrender conditions contained in the Sullivan Creek Project settlement agreement, (2) ensure coordinated review, analysis, and decision-making by the Commission, USFS, U.S. Department of Interior, and Ecology regarding the interdependent measures that are proposed for the Boundary Project and the Sullivan Creek Project, and (3) conserve the Commission’s and Joint Movants’ resources by streamlining environmental review of a relicensing and license surrender of two projects affecting the same resources.

DATED this 29th day of March, 2010.

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