

APPENDIX A

Relicensing Process Plan

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Southern California Edison Company Rush Creek Project (FERC No. 1389)

Relicensing Process Plan



Southern California Edison Company
Eastern Hydro Division
4000 Bishop Creek Road
Bishop Plant 4
Bishop, CA 93514

December 2021

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1.0 INTRODUCTION

The following Relicensing Process Plan identifies Southern California Edison Company's (SCE) approach for relicensing the Rush Creek Project (Federal Energy Regulatory Commission [FERC or Commission] Project No. 1389) including Communication and Participation Protocols (Protocols) for stakeholder participation. SCE intends to use FERC's Integrated Licensing Process (ILP) to relicense the Rush Creek Project. The formal relicensing process is initiated upon SCE filing of the Notice of Intent (NOI) and Pre-Application Document (PAD) with FERC, required within 5 years prior to the expiration of the License (January 31, 2022).¹

The Relicensing Process Plan describes SCE's plan and schedule for pre-application activities, incorporating the time frames for pre-filing consultation and information gathering; FERC scoping; study plan development, execution, and reporting; filing of the License Application; and FERC application processing.

This document also contains Communication and Participation Protocols (Protocols) that provide guidelines for participation in the relicensing process by interested parties, including governmental agencies, Native American tribes, non-governmental organizations, and members of the public. These interested parties are herein referred to as stakeholders or Relicensing Participants. The Protocols are included in Attachment 1 and are briefly described in Section 4.0.

2.0 RELICENSING ACTIVITIES

SCE intends to relicense the Rush Creek Project using FERC's ILP. To facilitate communication during the relicensing, SCE established a publicly accessible Internet website for the Rush Creek Project relicensing at www.sce.com/RushCreek. The website contains information regarding relicensing activities, including meeting notices and agendas; major filings by SCE or FERC; reference materials; key decisions and action items; and links to relevant information sources such as FERC's ILP regulations. Updates to the Relicensing Process Plan and schedule will be posted on the website. In addition, all documents filed with FERC by SCE will be available at SCE's Eastern Hydro Division Office, 4000 Bishop Creek Road, Bishop Plant 4, Bishop, CA 93514.

SCE's relicensing process objectives include:

- Acquisition of a new FERC license.
- Adherence to all regulatory deadlines.
- Engagement of stakeholders in an open and transparent forum that promotes a free exchange of ideas.

¹ SCE is required to file an NOI and PAD at least five years, but not more than five and one-half years, before the existing license expires.

- Facilitation of an efficient process by developing clear meeting agendas and objectives that are focused on sharing of information and developing mutually acceptable solutions rather than communicating positions.
- Efficient completion of the study phase (development, implementation, and reporting) and analytical tool development to provide sufficient time for SCE and the stakeholders to evaluate Project impacts and collaborate on the Proposed Project included in the License Application.

An overview of the major elements of the FERC relicensing process and corresponding ILP regulatory requirements is illustrated on Figures 1a and 1b briefly discussed below.

2.1 EARLY RELICENSING ACTIVITIES

Prior to submittal of the NOI and PAD, SCE initiated the following relicensing activities:

- Distributed a questionnaire to stakeholders soliciting information on existing, relevant, and reasonably available information that describes the existing Project environment; and information related to resource issues and local community concerns.
- Convened a relicensing kick-off webinar to acquaint interested parties with FERC's ILP, including key milestones and opportunities for stakeholder participation. SCE also provided an overview of the existing Project; the Proposed Project under consideration in the relicensing proceeding; and the Pre-Application Document.

2.2 FORMAL RELICENSING ACTIVITIES

2.2.1 Filing of Notice of Intent and Pre-Application Document

SCE's filing of the NOI and PAD with FERC formally initiated the relicensing process for the Rush Creek Project and the associated regulatory deadlines specified in the ILP. In the filing, SCE requested designation as the Commission's non-Federal representative for the purpose of consultation under Section 7 of Endangered Species Act (ESA) and authorization to initiate consultation under Section 106 of the National Historic Preservation Act (NHPA).

2.2.2 FERC Scoping

As part of formal scoping for the Project, FERC is required to hold an Initial Tribal Consultation Meeting with Federally-recognized tribes within 30 days of the filing of the NOI and PAD. Within 60 days of the filing of the NOI and PAD, FERC is required to issue a Notice of Commencement of Proceeding and Scoping Document. Within 30 days of the Notice of Commencement of Proceeding, FERC will conduct a public scoping meeting(s) and site visit(s).² The purpose of the scoping meeting(s) is to identify environmental issues to be considered in FERC's environmental analysis conducted under the

² Recently, as a result of the pandemic, FERC has elected to conduct virtual scoping for hydropower relicensing projects.

National Environmental Policy Act (NEPA). Comments on the PAD and Scoping Document 1 must be submitted to FERC within 60 days following FERC's Notice of Commencement of Proceeding.

2.2.3 Study Plan Development, Execution, and Reporting

Under the ILP, FERC has a well-defined process for development of study plans. However, SCE has enhanced the process under FERC's regulations by including draft technical study plans in the PAD. This approach is intended to provide stakeholders with a firm understanding of SCE's study approach—before they prepare their own study requests for FERC's consideration, in response to FERC's issuance of the Scoping Document. In addition, following submittal of the PAD, SCE will convene a series of Technical Working Groups to further refine the draft technical study plans included in the PAD.

Within 45 days following the end of the PAD/Scoping Document 1 comment period, SCE must file proposed study plans with FERC. During a 90-day comment period, that begins once the proposed study plans are filed, but no later than 30 days after filing the proposed study plans, SCE must hold an initial study plan meeting for purposes of attempting to resolve any outstanding issues. Following the close of the comment period, SCE will prepare revised study plans, as appropriate, that address stakeholder comments received and, if necessary, explain why additional study requests were not adopted. Revised study plans are due within 30 days of the close of the initial comment period, followed by another 15-day stakeholder comment period.

Pursuant to 18 Code of Federal Regulations (CFR) § 5.13, FERC will then issue a Study Plan Determination, with regard to SCE's revised study plans, including any modifications deemed necessary in light of the record. If no disputes are received by a mandatory conditioning agency, the study plans are deemed approved, and implementation of the plans must proceed. In the case of a dispute, FERC initiates a formal dispute resolution process and within 70 days makes a final determination of the fate of the dispute, which must be incorporated into the study plans. Any comments on study plans that are not under dispute must be implemented by SCE according to the proposed schedule.

During study implementation, SCE must file an initial and updated study report with FERC describing overall progress in implementation of the study plans, including data collected to date, any deviations in technical approaches or schedules, and a proposed schedule for completion of the remaining study plan components. The reports must also include a description of any proposed modifications to the approved studies or new studies proposed by SCE. FERC may amend the approved study plans, as appropriate, after reviewing comments by stakeholders received during a public meeting or filed in writing. However, any modification of the approved study plans, or additions of new study plans must meet strict criteria prior to being considered.

2.2.4 Filing of License Application

SCE must file a Preliminary Licensing Proposal or Draft Application with FERC no later than 150 days before the Final Application is filed. Stakeholder comments on the Draft Application are due within 90 days of filing and will be addressed by SCE in the Final Application. The Final Application must be filed with FERC by January 31, 2025, two years before the license expiration date.

2.2.5 FERC Application Processing

A two-year period is allocated within the ILP regulations for FERC's processing of the License Application. Upon receipt of the Final Application, FERC issues a tendering notice, and subsequently, a Notice of Acceptance and Notice of Ready for Environmental Review (REA). Preliminary terms and conditions from the resource agencies and requests for intervention are due to FERC no later than 60 days following the REA. The remainder of the time is allocated to FERC's environmental review process, document preparation, and finalization of resource agencies' mandatory terms and conditions. During this time, FERC will issue a draft and final NEPA document (either an Environmental Assessment or an Environmental Impact Statement) evaluating Project-related impacts and proposed new license conditions.

Terms and conditions from resource agencies with mandatory conditioning authority will be included in the environmental document and new license. Based on consideration of recommendations by FERC staff in the NEPA document, FERC should issue a new license to SCE for the Rush Creek Project around January 31, 2027.

3.0 RELICENSING SCHEDULE

The proposed Relicensing Process Plan schedule for the Rush Creek Project was developed consistent with the regulations provided in Title 18 CFR Part 5 – Integrated License Application Process. Figures 1a and 1b provides an overview of key activities in the ILP. SCE's proposed schedule presented in Table 1 provides each of the major relicensing activities in the ILP, the associated CFR reference, the party responsible for implementation of the activity, and the deadline for each activity.

The proposed process schedule is based on SCE filing the Rush Creek Project NOI and PAD on January 31, 2022. The deadlines presented in the schedule identify the specific date that each activity must be completed by to comply with federal regulations. However, relicensing activities may be completed early, prior to the specific deadline. The current process schedule includes timeframes for Formal Dispute Resolution even though any study disputes may be resolved through informal dispute resolution. Therefore, the process schedule is subject to change during the relicensing process. SCE will revise the Relicensing Process Plan and schedule for the Rush Creek Project, as needed, and post the updated version on the SCE relicensing website.

4.0 COMMUNICATION AND PARTICIPATION PROTOCOLS

Draft Protocols for the Rush Creek Project (Attachment 1) provide guidelines for participation in the relicensing process by Relicensing Participants.

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TABLES

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Table 1. Proposed Relicensing Process Schedule for the Rush Creek Project (FERC Project No. 1389).¹

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame	Deadline²
<i>Initiation of Relicensing Process</i>				
5.5 5.5(d)	Filing of Notification of Intent (NOI)	SCE	Five to five and one half years prior to existing license expiration. Filed concurrent with Pre-application Document.	1/31/2022
5.5(e)	Request to be non-Federal representative under Section 7 of the Endangered Species Act (ESA)	SCE	Provide simultaneously with filing of NOI.	1/31/2022
5.5(e)	Request to initiate consultation under Section 106 of the National Historic Preservation Act (NHPA)	SCE	Provide simultaneously with filing of NOI.	1/31/2022
5.6 5.6(a)	Filing of Pre-application Document (PAD)	SCE	Five to five and one half years prior to existing license expiration. Filed concurrent with NOI.	1/31/2022
<i>FERC Scoping</i>				
5.7	Initial Tribal Consultation Meeting	FERC	Within 30 days following filing of NOI/PAD.	3/2/2022
5.8 5.8(a)	Notice of Commencement of Proceeding and Scoping Document	FERC	Within 60 days of filing NOI/PAD.	4/1/2022
5.8(a)(b) 5.8(b)(iv)	Issue notice of NOI/PAD and request for comments	FERC	Included in notice of commencement of proceeding.	4/1/2022
5.8(b)(2)	Decision regarding licensee request to initiate informal consultation under Section 7 of the ESA, or Section 106 of the NHPA	FERC	Included in notice of commencement of proceeding.	4/1/2022
5.8(c)	Issue Scoping Document 1 (SD1)	FERC	Concurrent with notice of commencement of proceeding.	4/1/2022

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame	Deadline²
5.8(b)(3)(viii)	Conduct public scoping meeting and site visit	FERC	Within 30 days of the notice of commencement of proceeding.	5/2/2022
5.9(a)	File comments on NOI/PAD and SD1, and provide study requests	Relicensing Participants	Within 60 days following the notice of commencement of proceeding.	6/1/2022
5.10	Issue Scoping Document 2 (if necessary)	FERC	Within 45 days following the deadline for filing of comments on SD1.	7/18/2022
<i>Study Plan Development</i>				
5.11 5.12	Proposed Study Plan and Study Requests			
5.11(a)	File Proposed Study Plan	SCE	Within 45 days following the deadline for filing of comments on the PAD and providing study plan requests.	7/18/2022
5.11(e)	File proposal for conducting study plan meeting(s) during 90-day Proposed Study Plan review period.	SCE	Concurrent with Proposed Study Plan	7/18/2022
5.11(e)	Conduct initial study plan meeting	SCE	No later than 30 days after the deadline date for filing the Proposed Study Plan.	8/17/2022
5.12	File comments on Proposed Study Plan or submit revised study requests	Relicensing Participants	Must be filed within 90 days after the Proposed Study Plan is filed.	10/17/2022
5.13	Revised Study Plan and Study Plan Determination			
5.13(a)	File Revised Study Plan	SCE	Within 30 days following the deadline for filing comments on the Proposed Study Plan.	11/16/2022
5.13(b)	File comments on Revised Study Plan	Relicensing Participants	Within 15 days following filing of the Revised Study Plan.	12/1/2022

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame	Deadline²
5.13(c)	Issue Study Plan Determination	FERC	Within 30 days following filing of the Revised Study Plan.	12/16/2022
5.13(d) 5.14(a)	File notice of study dispute	Mandatory Conditioning Agencies	Within 20 days of the Study Plan Determination.	1/5/2023
5.13(d)	Study Plan approved, if no notice of study dispute is filed	FERC	Twenty days following the notice of study dispute filing period.	1/25/2023
5.14	Formal Study Dispute Resolution Process			
5.14(d)	Convene Dispute Resolution Panel, if notice of Study Plan dispute is filed	FERC	Within 20 days of the notice of study dispute.	1/25/2023
5.14(i)	File with Commission and serve upon panel members comments and information regarding dispute	SCE	No later than 25 days following the notice of study dispute.	1/30/2023
5.14(k)	Issue findings and recommendations regarding the study plan dispute to Director of the Office of Energy Projects	Dispute Resolution Panel	No later than 50 days following the notice of study dispute.	2/24/2023
5.14(l)	Issue written determination on study plan dispute	FERC	No later than 70 days from the date of filing of the notice of study dispute.	3/16/2023
Conduct Studies				
5.15(a)	Conduct First Year Studies (for study plans not under dispute)	SCE	January–December 2023	12/31/2023
5.15(b) 5.15(c)(1)	File Initial Study Report	SCE	Within one year after Commission approval of the study plan.	12/16/2023
5.15(c)(2)	Conduct Initial Study Report Meeting	SCE	Within 15 days of filing the Initial Study Report.	1/2/2024

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame	Deadline²
5.15(c)(3)	File Initial Study Report Meeting Summary, including any study modifications or new studies	SCE	Within 15 days following the Initial Study Report Meeting.	1/17/2024
5.15(c)(4)	File disagreement with Initial Study Report Meeting Summary	FERC and Relicensing Participants	Within 30 days following the filing of the Initial Study Report Meeting Summary.	2/16/2024
5.15(c)(7)	If no disagreements are filed, approve Initial Study Report Meeting Summary and any proposed study plan amendments	FERC	Thirty days following the filing of the Initial Study Report Meeting Summary.	2/16/2024
5.15(c)(5)	If disagreements are filed, file responses to disagreement with Initial Study Report Meeting Summary	FERC, SCE and Relicensing Participants	Within 30 days of the filing of a disagreement with Initial Study Report Meeting Summary	3/18/2024
5.15(c)(6)	Resolve disagreement and amend approved study plan	FERC	Within 30 days following the due date for responses to disagreement.	4/17/2024
5.15(f)	Conduct Second Year Studies (for study plans not under dispute)	SCE	January–December 2024	12/31/2024
5.15(f)	File Updated Study Report	SCE	Within two years after Commission approval of the study plan.	12/16/2024
5.15(c)(2)	Conduct Updated Study Report Meeting	SCE	Within 15 days of filing the Updated Study Report.	12/31/2024
5.15(c)(3)	File Updated Study Report Meeting Summary, including any study modifications or new studies	SCE	Within 15 days following the Updated Study Report Meeting.	1/15/2025
5.15(c)(4)	File disagreement with Updated Study Report Meeting Summary	FERC and Relicensing Participants	Within 30 days following the filing of the Updated Study Report Meeting Summary.	2/14/2025

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame	Deadline²
5.15(c)(7)	If no disagreements are filed, approve Updated Study Report Meeting Summary and any proposed study plan amendments	FERC	Thirty days following the filing of the Updated Study Report Meeting Summary.	2/14/2025
5.15(c)(5)	If disagreements are filed, file responses to disagreement with Updated Study Report Meeting Summary	FERC, SCE and Relicensing Participants	Within 30 days of the filing of a disagreement with Updated Study Report Meeting Summary.	3/17/2025
5.15(c)(6)	Resolve disagreement and amend approved study plan	FERC	Within 30 days following the due date for responses to disagreement.	4/16/2025
<i>Filing of License Application</i>				
5.16(a)	File Preliminary Licensing Proposal or Draft Application	SCE	No later than 150 days prior to the deadline for filing a new license application.	9/3/2024
5.16(e)	File comments on Preliminary Licensing Proposal or Draft License Application	FERC and Relicensing Participants	Within 90 days of the filing date of the Preliminary Licensing Proposal or Draft Application.	12/2/2024
5.17(a)	File License Application	SCE	No later than 24 months before the existing license expires.	1/31/2025

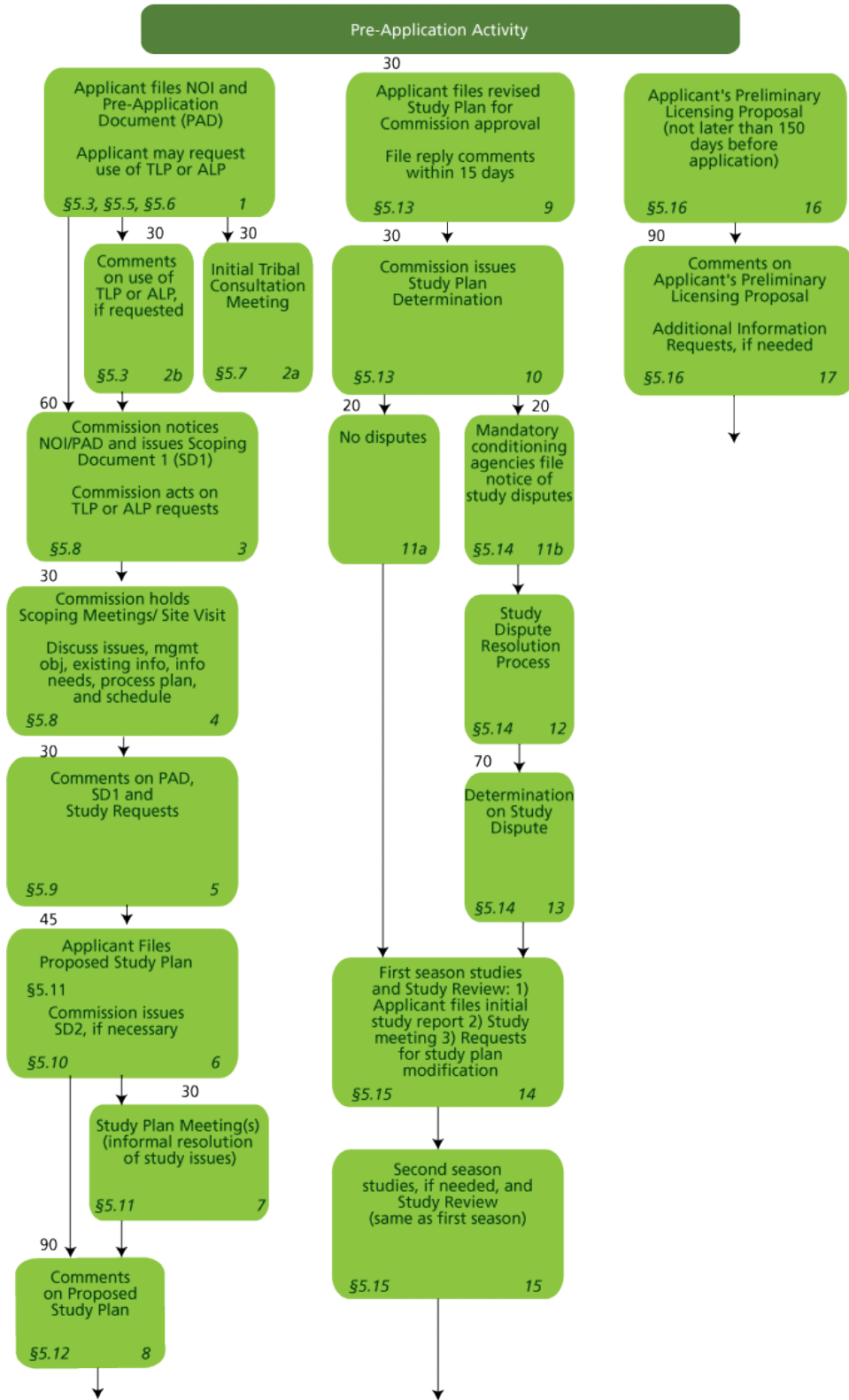
Notes:

- 1 Bold text represents key milestone activities in the relicensing process.
- 2 According to 18 CFR § 385.2007(a)(2), if a filing date falls on a Saturday, Sunday, or federal legal public holiday, the deadline for filing becomes the next business day. The schedule includes this consideration.

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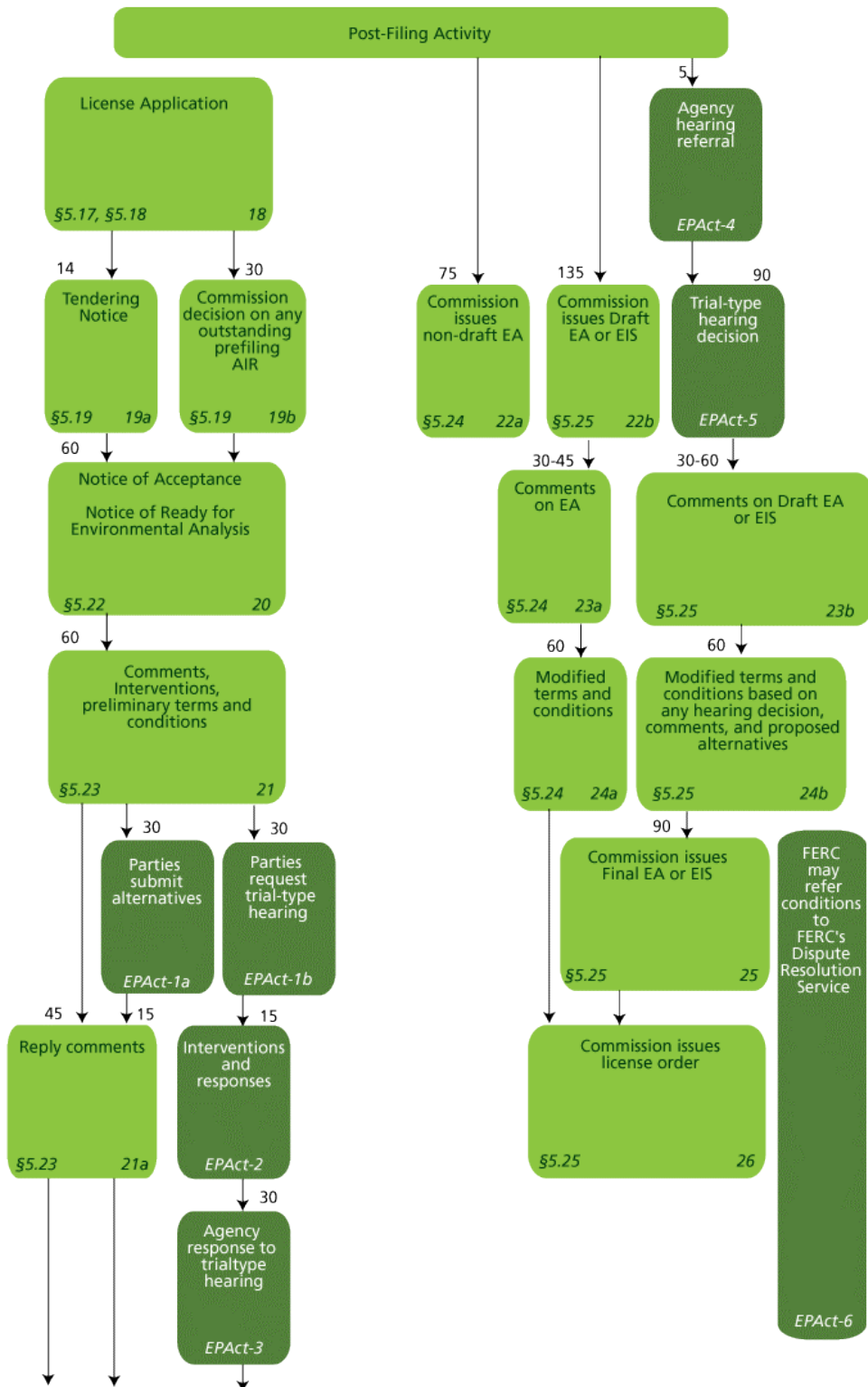
FIGURES

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Source: <https://www.ferc.gov/media/3508>

Figure 1a. FERC Integrated Licensing Process – Pre-Application Activity (5.5 to 5 Years Prior to License Expiration).



Source: <https://www.ferc.gov/media/4010>

Figure 1b. FERC Integrated Licensing Process – Post-Filing Activity (2 Years Prior to License Expiration)

ATTACHMENT 1
Communication and Participation Protocols

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Southern California Edison Company Rush Creek Project (FERC No. 1389)

Communication and Participation Protocols



Southern California Edison Company
Eastern Hydro Division
4000 Bishop Creek Road
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December 2021

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1.0 OBJECTIVE OF COMMUNICATION AND PARTICIPATION PROTOCOLS

The objective of the Communication and Participation Protocols (Protocols) is to provide guidelines for participation in the relicensing process for Southern California Edison Company's (SCE or Licensee) Rush Creek Project (Project), Federal Energy Regulatory Commission (FERC or Commission) Project No. 1389. The Protocols pertain to the Licensee, governmental agencies, Native American tribes, non-governmental organizations, and members of the public who participate in the proceeding.

2.0 DEFINITIONS

The following definitions apply:

- Administrative Provisions: Any provisions agreed to by Relicensing Participants.
- FERC: Federal Energy Regulatory Commission.
- Rush Creek Distribution List: A mailing list of Relicensing Participants prepared and maintained by the Licensee for the relicensing of the Rush Creek Project. SCE will update the distribution list periodically during the relicensing.
- FERC Project No. 1389 Service List: A mailing list of parties that have formally intervened in the relicensing proceeding. The service list is prepared and maintained by FERC.
- ILP: FERC's Integrated Licensing Process defined in Title 18 CFR Part 5.
- Licensee: Southern California Edison Company, the owner and operator of the Rush Creek Project (FERC No. 1389).
- PAD: Pre-Application Document required by FERC.
- Relicensing Process Plan and Schedule: The Relicensing Process Plan and Schedule prepared by the Licensee and included in the Licensee's PAD, which will be maintained and updated by the Licensee through the relicensing process.
- Relicensing: The relicensing process for the Rush Creek Project, FERC Project No. 1389.
- Relicensing Participants: The Licensee and those governmental agencies, Native American tribes, non-governmental organizations, members of the public, and others interested in the relicensing and represented at a scheduled relicensing meeting or who participate in relicensing activities.
- Technical Working Group (TWG): Focus group working on specific technical issues during the relicensing.

3.0 PARTICIPATION

3.1 RELICENSING PARTICIPANTS

Participation in the relicensing proceeding is open to governmental agencies, Native American tribes, non-governmental organizations, members of the public, and others having an interest in the relicensing. To facilitate communication, governmental agencies and non-governmental organizations are encouraged to designate one individual and one alternate to represent them during the relicensing proceeding. The individuals designated as the representative for an agency or organization will be the point of contact for relicensing correspondence and are responsible for keeping their respective organizations and constituencies informed of relicensing activities. The designated individual is expected to have the authority to speak on behalf of the organization.

Relicensing Participants will clearly identify who they represent at the beginning of each meeting and if they represent more than one entity, all organizations will be identified. Participation by members of the media, in their official capacity, is discouraged. Media members that attend any meeting, in their official capacity, must notify the Relicensing Participants of their affiliation and intent at the beginning of any Licensee-sponsored meeting.

3.2 LATE PARTICIPATION IN THE RELICENSING

Relicensing Participants who begin participating in the relicensing after commencement of the proceeding are expected to get themselves informed and “up-to-speed” with the rest of the Relicensing Participants. Absence or late/delayed participation will not be allowed to disrupt the process. Upon first contact with new Relicensing Participants, the Licensee will offer the new participant a copy of the Protocols and direct them to the PAD on the Project website. Upon request, the Licensee will provide individuals who begin participating in the relicensing after the proceeding has commenced a brief overview of the proceeding, key decisions to date, and layout of the website where relicensing material is maintained. Confidential material will be provided to the participant, if appropriate, according to guidelines specified in the Protocols. Questions about past work, decisions, or status of the relicensing process should be directed to the Licensee.

4.0 RELICENSING WEBSITE

The Licensee will establish and maintain a publicly accessible Internet website as a means of making relicensing information readily available to Relicensing Participants. The Licensee anticipates posting meeting notices and agendas; major filings by SCE or FERC; reference materials; key decisions and action items; and links to relevant information sources. The Rush Creek Project relicensing website can be accessed at www.sce.com/RushCreek.

5.0 MEETINGS

5.1 TYPES OF MEETINGS

FERC's regulations require that certain meetings be conducted, and the Relicensing Process Plan and Schedule identify several of these meetings. The ILP regulations stipulate that some meetings are the responsibility of FERC and some are the responsibility of the Licensee. In addition to the required meetings, the Licensee anticipates that other meetings will be needed, particularly during development of study plans and discussion on the Proposed Project. The Protocols apply only to meetings sponsored by the Licensee.

5.1.1. General Protocols

- Notice/Agenda – The Licensee anticipates that it will provide notice for meetings not specifically required by the regulations (e.g., study plan development meeting), principally via e-mail using the Licensee's Rush Creek Distribution List and on the Licensee's relicensing website. The Licensee-sponsored relicensing meetings will generally be scheduled with the consensus of the Relicensing Participants present. The Licensee will develop an agenda for upcoming meetings based on input from the Relicensing Participants at the previous meeting and will provide it to Relicensing Participants at least seven days ahead of the meeting. Relicensing Participants may request items be added to a meeting agenda.
- Meeting Moderation – The Licensee anticipates that they will lead the meetings and be responsible to assure that all Relicensing Participants are heard. The relicensing meetings will reflect the Licensee's commitment to conduct an open and transparent process with a free exchange of information and interests.
- New Participants – At relicensing meetings, first time participants will be asked to identify themselves and their interest.
- Key Decisions and Action Items – The Licensee will prepare a memo summarizing key decisions and action items committed to at the meeting for reference in future meetings and for review by those who could not attend the meeting. This memo is not intended to be a transcript of the meeting or meeting notes or to state the position of any Relicensing Participant. The Licensee will distribute the key decisions and action items memo via e-mail using the Licensee's Rush Creek Distribution List and post on the Project website.
- Use of Facilitator – If needed, the Licensee will use an independent third-party neutral facilitator for meetings.

5.2 ATTENDANCE AT MEETINGS

Relicensing Participants are expected to make a good faith effort to attend or have a representative attend every TWG or subgroup meeting in which the participant is active. If a Relicensing Participant is unable to attend or have a representative attend a meeting, then the Relicensing Participant will make a good faith effort to provide to the Licensee any input at least two working days prior to the meeting.

Relicensing Participants unable to attend a meeting may request to receive all materials distributed and may provide written comments to the Licensee for consideration by the Relicensing Participants.

5.3 CAUCUS

Any Relicensing Participant may call for a caucus at any time during any meeting. Relicensing Participants may caucus between meetings. Relicensing Participants should report that they met and, if possible, provide details of the caucus, or disclose any decisions that were reached.

5.4 PREPARATION

Relicensing Participants are expected to make a good faith effort to read background information provided before each meeting and to be prepared to effectively discuss topics on the meeting agenda.

6.0 DOCUMENTS

6.1 TYPES OF DOCUMENTS

FERC's regulations identify a number of documents required for the ILP. The ILP regulations stipulate that some documents are the responsibility of FERC and some are the responsibility of the Licensee. The Licensee anticipates that there will also be other informal documents generated during the course of the relicensing.

6.1.1. FERC's Documents

For documents issued by FERC, the Licensee anticipates that FERC will distribute these documents in accordance with its protocols. FERC will use its FERC Project No. 1389 Mailing List for such distributions. The Licensee anticipates that all documents issued or received by FERC will be posted and publicly available in the "eLibrary" on FERC's website at www.ferc.gov. Click on "Documents and Filing," "eLibrary," then "General Search." The website provides further instructions for obtaining documents.

Each Relicensing Participant can register to receive a notice each time FERC posts a document to its website regarding the relicensing. To register, go to FERC's website at www.ferc.gov. Click on "Documents and Filing," then "eSubscription." The website provides further instructions.

6.1.2. Licensee's Documents

The Licensee will use electronic filing, whenever possible, for documents it files with FERC, and will distribute notice of such document filings by e-mail to the Licensee's Rush Creek Distribution List. The distribution will also go to FERC's Project No. 1389 Service List. The Licensee will also use e-mail for distribution of informal documents. The Licensee will also post on the relicensing website all public documents it sends or receives regarding the relicensing.

6.1.3. Other Participants' Documents

The Licensee anticipates that most Relicensing Participants will use electronic filing for documents they file with FERC and will distribute such documents by e-mail to the Licensee's Rush Creek Distribution List. The Licensee anticipates that all documents received by FERC will be posted and publicly available in the eLibrary on FERC's website at www.ferc.gov. The Licensee anticipates that most Relicensing Participants will use e-mail for distribution of informal documents they initiate.

6.1.4. Public Review File

The Licensee shall maintain a Public Review File that constitutes the formal written record of the relicensing process. The Public Review File will include documents filed by the Licensee during the relicensing process.

The Licensee will document all action items and critical decisions of Relicensing Participants and post them on the website so that Relicensing Participants can track the decision-making and actions.

The Public Review File will be made available at the following locations:

- In electronic format, on the Licensee's relicensing website, accessible at www.sce.com/RushCreek.
- In paper format, at the Licensee's Resource Library, located at SCE's Eastern Hydro Division Office, 4000 Bishop Creek Road, Bishop Plant 4, Bishop, CA 93514. To access the Licensee's Resource Library, individuals must schedule an appointment by contacting Matthew Woodhall, SCE Relicensing Project Manager, at (909) 362-1764, or [mailto: matthew.woodhall@sce.com](mailto:matthew.woodhall@sce.com).

FERC's website will also have formally submitted documents. Any interested party may submit comments and other materials to the Licensee and FERC for inclusion in the Public Review File. All written and electronic communications that an interested party would like to include in the Public Review File for the Rush Creek Project should be sent to both the Licensee and FERC. **Electronic submission of materials is preferred.**

Written comments to the Licensee should be mailed or e-mailed to:

Southern California Edison Company
Attn: Matthew Woodhall
Regulatory Support Services
1515 Walnut Grove Ave
Rosemead, CA 91770
matthew.woodhall@sce.com

Written comments to FERC should be mailed to FERC's Secretary of the Commission (not FERC's staff assigned to the relicensing) at:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Comments can also be electronically filed on FERC's website at www.ferc.gov. All material submitted for inclusion in the formal record must clearly display the following information on the first page: Rush Creek Project, Project No. 1389 Formal Communication. Relicensing Participants should provide all material in electronic format, to the extent reasonably possible, to allow the material to be posted promptly on the Licensee's relicensing website. Material may be submitted in both electronic and paper format, if appropriate. Written comments received by FERC will become part of the official record for the Rush Creek Project and be posted and publicly available in the eLibrary on FERC's website.

6.2 SINGLE-TEXT APPROACH

Participants in TWG and subgroup meetings will use a single-text approach for development of protocols and study plans. All comments by the Relicensing Participants on a given document under consideration by the TWGs and subgroups will be made on the actual document in question, using track/edit changes if possible, such that the comments can easily be understood, shared, and integrated into a revised text. Each version of the text shall be clearly labeled. Alternatively, a group may elect to jointly edit a document during a meeting, with all Relicensing Participants offering comments during the session.

The Licensee will maintain a cumulative record of the decisions reached on a given document. Documents will include a footer, the title of the document, page numbers, date of origination, date of revision, version number, and initials of last person who has edited the document.

7.0 CONFIDENTIALITY

Some information developed under the ILP may be confidential under California or applicable law. For example, information on Native American resources, locations of sensitive environmental and cultural resources, and engineering drawings of Project facilities are considered confidential material with restrictions on their distribution. It is the responsibility of the Relicensing Participant providing confidential information to identify the information as confidential in advance of disclosure and inform the group.

The Licensee's approach is to provide an open and transparent process acknowledging that confidentiality agreements with the tribes on certain cultural resource issues as well as FERC's regulations regarding the distribution of Privileged and Critical Energy Infrastructure Information (CEII) must be honored.

8.0 PERSONAL CONDUCT

8.1 RESPECT FOR PARTICIPANTS

The personal integrity, values, and legitimacy of the interests of each Relicensing Participant are expected to be respected by all other Relicensing Participants. In addition, each Relicensing Participant agrees to adhere to the ground rules provided and reviewed at each meeting.

8.2 COMMITMENTS

Commitments will not be made lightly and will be kept.

8.3 COMMUNICATING INTERESTS

Every Relicensing Participant is responsible for communicating their interests and the interests of the governmental agency or non-governmental organization they represent on topics under consideration. It is incumbent upon each Relicensing Participant to state his or her interests. Voicing these interests is essential to enable meaningful dialogue and full consideration of different points of view. Resource information germane to assessment of potential Project impacts and development of the Proposed Project is expected to be shared with the other Relicensing Participants.

8.4 GOOD FAITH

All Relicensing Participants are expected to make a good faith effort to achieve relicensing objectives through use of the ILP.

9.0 COMMUNICATIONS

9.1 COMMUNICATIONS AMONG RELICENSING PARTICIPANTS

All Relicensing Participants are free to informally communicate with each other; however, Relicensing Participants are encouraged to share relevant communications among all Relicensing Participants, as appropriate.

Other than verbal communications at meetings, e-mail will be the primary means of formal communication among the Relicensing Participants. The initiator of any such e-mail is responsible for ensuring that it is sent to all Relicensing Participants, as applicable.

9.2 COMMUNICATIONS WITH FERC

Written comments to FERC should be electronically filed on FERC's website at www.ferc.gov or be mailed to FERC's *Secretary of the Commission* (not FERC's staff assigned to the relicensing). Written comments received by FERC will not be distributed but will become part of the official record for the Rush Creek Project and be posted and publicly available in the eLibrary on FERC's website. Each participant in the relicensing can register to receive a notice each time FERC posts a document to its website regarding the relicensing (see Section 6.1.1).

9.3 MEDIA COMMUNICATIONS

Relicensing Participants may communicate with the media regarding their own views, interests and positions, but should avoid making statements characterizing other Relicensing Participants' interests. Relicensing Participants will promptly inform the Licensee and other Relicensing Participants of relevant communications with the media.

10.0 COMPLIANCE WITH PROTOCOLS

Each Relicensing Participant is expected to voluntarily abide by the Protocols. The Licensee does not propose that participation in the relicensing is contingent upon formal acceptance of the Protocols rather than the participants voluntarily abide by the letter and intent of the Protocols.