

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Alcoa Power Generating Inc. ) Yadkin Hydroelectric Project, P-2197-109  
Cube Yadkin Generation LLC ) North Carolina

MOTION TO INTERVENE  
BY THE NORTH CAROLINA WILDLIFE RESOURCES COMMISSION  
(August 29, 2016)

The North Carolina Wildlife Resources Commission (hereinafter, “the Wildlife Resources Commission”) by this motion respectfully requests the Federal Energy Regulatory Commission to allow it to join as a party in the above-captioned action. In support thereof, the Commission submits the following:

I. Legal Basis for Intervention:

The Wildlife Resources Commission is an agency of the State of North Carolina created by authorization by the General Assembly (N.C.G.S. § 143, Article 24). The purpose of the Wildlife Resources Commission is to...

...manage, restore, develop, cultivate, conserve, protect, and regulate the wildlife resources of the State of North Carolina, and to administer the laws relating to game, game and freshwater fishes, and other wildlife resources enacted by the General Assembly to the end that there may be provided a sound, constructive, comprehensive, continuing, and economical game, game fish, and wildlife program directed by qualified, competent, and representative citizens, who shall have knowledge of or training in the protection, restoration, proper use and management of wildlife resources. (N.C.G.S. § 143-239)

The Wildlife Resources Commission is authorized to intervene in accordance with provisions of the Federal Power Act (16 U.S.C. 791a et seq.) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), since this project has an impact on fisheries and wildlife resources of the state.

II. Factual Basis for Intervention:

Intervention by the Wildlife Resources Commission is in the public interest for the following reasons:

1. The Wildlife Resources Commission has a vested interest in the project with regards to its statutory responsibility for the long term protection of public trust resources.
2. The Wildlife Resources Commission is responsible for the management of game and non-game fish and wildlife associated with the Yadkin River and adjacent lands.

3. The Wildlife Resources Commission is responsible for providing boating and wildlife-associated recreational opportunities on the Yadkin River and adjacent lands.

### III. Conclusion

For the foregoing reasons, the North Carolina Wildlife Resources Commission seeks to intervene as a party in this action and will advocate conservation of fish and wildlife resources, and the recreational opportunities they provide.

All notices in this matter should be served upon the following:

Christopher Goudreau (eService)  
Hydropower Licensing Coordinator  
North Carolina Wildlife Resources Commission  
645 Fish Hatchery Road  
Marion, NC 28752  
(828) 652-4360 ext. 223  
[chris.goudreau@ncwildlife.org](mailto:chris.goudreau@ncwildlife.org)

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on the persons designated on the official service list compiled by the Secretary in this proceeding.

Dated at Marion this 29<sup>th</sup> day of August 2016.



Christopher Goudreau