



February 13, 2026

ELECTRONICALLY SUBMITTED

Honorable Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
88 First Street, N.E.
Washington, D.C. 20426

RE: Application for a Non-Capacity Amendment to the Bradley Lake Hydroelectric Project
(FERC Project No. 8221) – Proposed Bradley Lake Expansion Project

Dear Secretary Reese:

Enclosed please find the Alaska Energy Authority's (AEA) application for a non-capacity amendment to the Bradley Lake Hydroelectric Project. The proposed amendment of the license would allow AEA to construct a new diversion dam (Dixon Diversion) and raise Bradley Lake's normal maximum operating elevation by 16 feet (Bradley Lake Pool Raise). Together, these two components, referred to in this application as the Bradley Lake Expansion Project (or Project), would increase the amount of power the Bradley Lake Hydroelectric Project can produce. The installed capacity would increase, but the hydraulic capacity would remain unchanged.

If you have any questions or need further information, please contact Mr. Ryan McLaughlin at 907-771-3012 or rmlaughlin@akenergyauthority.org.

Sincerely,

ALASKA ENERGY AUTHORITY

A handwritten signature in black ink, appearing to read "Curtis Thayer".

Curtis Thayer
Executive Director

eFile:	Debbie-Anne A. Reese, Secretary Via eLibrary at: www.ferc.gov
Enclosure:	Cover Letter DAA Initial Statement; Exhibits A, B, C, D, and E
	Exhibit G – Project Boundary Files

ALASKA ENERGY AUTHORITY

Bradley Lake Hydroelectric Project (FERC Project No. 8221)

Proposed Bradley Lake Expansion Project

Draft Application for a Non-Capacity Amendment

LIST OF EXHIBITS

Initial Statement

Exhibit A Project Description

Exhibit B Project Operations

Exhibit C Schedule

Exhibit D Cost and Financing

Exhibit E Preliminary Draft Environmental Assessment (PDEA)

Exhibit G Project Boundary Maps

Initial Statement

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

**Bradley Lake Hydroelectric Project
FERC Project No. 8221**

**APPLICATION FOR AMENDMENT OF LICENSE
FOR A MAJOR WATER POWER PROJECT – EXISTING DAM
GREATER THAN 10 MEGAWATTS**

INITIAL STATEMENT

Pursuant to Section 4.201 of the Federal Energy Regulatory Commission's regulations,¹ the Alaska Energy Authority, as licensee of the Project, states as follows:

1. The Alaska Energy Authority (hereinafter "AEA" or "Licensee" or "Applicant") applies to the Federal Energy Regulatory Commission (hereinafter "FERC" or "Commission") for an amendment to the Bradley Lake Hydroelectric Project License (FERC No. 8221) as described in the attached Exhibits.
2. The location of the Project is:

State:	Alaska
Borough/census area:	Kenai Peninsula Borough
Township/nearby Towns:	The city of Homer
Stream or other body of water:	Bradley River; Martin River

3. The exact name, business address, and telephone number of the Applicant are:

Alaska Energy Authority
813 West Northern Lights Blvd.
Anchorage, AK 99503
907-771-3000

4. The exact name, business address, and telephone number of each person authorized to act as agent for the Applicant in this application are:

Mr. Curtis W. Thayer
Executive Director
Alaska Energy Authority
813 West Northern Lights Blvd.

¹ 18 C.F.R. § 4.201.

Anchorage, AK 99503
Telephone: 907-771-3009
Email: cthayer@akenergyauthority.org

Ryan McLaughlin, P.E.
Chief Dam Safety Engineer
Alaska Energy Authority
813 West Northern Lights Blvd.
Anchorage, AK 99503
Telephone: 907-771-3012
Email: rtmclaughlin@akenergyauthority.org

All correspondence pertaining to this application should also be provided to:

Betsy McGregor
Kleinschmidt Associates
11901 Circle Dr.
Anchorage, AK 99507
Telephone: 907-885-3418
Email: betsy.mcgregor@kleinschmidtgroup.com

5. The Applicant is:

A public corporation of the State of Alaska, within the Department of Commerce and Economic Development, but with a separate legal existence, and is the Licensee for the water power project designated as FERC Project No. 8221, issued on December 31, 1985.

6. The proposed amendment of license and the reasons why the amendment is necessary:

Through this non-capacity license amendment application AEA is seeking approval to: 1) construct a new diversion dam (Dixon Diversion), headworks, and conveyance system to capture flow from the Dixon Glacier, located in the headwaters of the East Fork Martin River approximately 5.9 miles south of the existing Bradley Lake Hydroelectric Project powerhouse, and divert that flow into Bradley Lake; and 2) raise Bradley Lake's normal maximum operating elevation by 16 feet through a combination of raising the concrete spillway crest, adding spillway crest gates, and raising the dam embankment crest (Bradley Lake Pool Raise).

Together, these two components, referred to in this application as the Bradley Lake Expansion Project, would increase the amount of power the Bradley Lake Hydroelectric

Project can produce from about 436,000 megawatt-hours (MWh) to 601,000 MWh each year (an increase of approximately 38 percent).

Power generated at the Bradley Lake Project is provided to the Alaska Railbelt region, which serves approximately 75 percent of Alaska's population spanning 700 miles from Homer to Fairbanks. The Railbelt is currently facing an imminent energy crisis due to declining gas reserves in Cook Inlet. Currently, the Railbelt receives 70 percent of its electricity from natural gas, and shortfalls could begin as early as 2027. The proposed project is a part of the solution to meet the short- and long-term need for power and diversify the Railbelt's generation mix.

The amendment would expand the FERC project boundary to include lands necessary to construct and operate the proposed project. Both the existing and proposed project are wholly located on land owned by the State of Alaska. The project boundary would increase from 8,532.4 acres to 8,805 acres.

The installed capacity would increase from 119,700 kilowatts (kW) to 122,800 kW due to increased head pressure associated with increasing the current net head from 917 feet to 933 feet. AEA proposes to amend Article 49, in relevant part, as follows:

Article 49. The Licensee shall pay the United States the following annual charges, effective the first day of the month in which this license is issued:

- (a) For the purpose of reimbursing the United States for the cost of administration of Part I of the Federal Power Act, a reasonable amount as determined in accordance the provisions of the Commission's regulations in effect from time to time. The authorized installed capacity for that purpose is **119,700 122,800** kilowatts.
- 7. (i) The statutory or regulatory requirements of the State of Alaska in which the Bradley Lake Hydroelectric Project is located, which would, assuming jurisdiction and applicability, affect the Bradley Lake Hydroelectric Project as proposed with respect to bed and banks and the appropriation, diversion, and use of water for power purposes, and with respect to the right to engage in the business of developing, transmitting, and distributing power and in any other business necessary to accomplish the purposes of the license under the Federal Power Act are:
 - (1) Water Rights Permit to Appropriate Public Waters (Alaska Statute [AS] 46.15): Alaska Department of Natural Resources (ADNR);
 - (2) Fish Habitat Permit (AS 16.05.871-,901): Alaska Department of Fish and Game (ADF&G);

- (3) Cultural resources preservation (AS 41.35): State Historic Preservation Office (SHPO); and
- (4) Section 401 of the Clean Water Act (CWA) certification: Alaska Department of Environmental Conservation (ADEC); however, it is not the practice of ADEC to issue CWA Section 401 certifications for hydropower projects.

In addition, AEA expects to file an application for the following federal permit:

- (5) U.S. Army Corps of Engineers (USACE) Section 404 CWA Permit.

7. (ii) The steps that the Applicant has taken, or plans to take, to comply with each of the laws cited above are as follows:

- (1) AEA has engaged in a three-stage consultation process (18 Code of Federal Regulations § 4.38) following FERC requirements for a non-capacity license amendment that involves a new diversion. This process is described in detail in Exhibit E of this amendment application;
- (2) AEA submitted an application for Water Rights from the ADNR for 480,000 acre-feet per year from the Martin River (#LAS 33602). The application was accepted with a provisional priority date of March 24, 2021, As this is a FERC-regulated hydroelectric project, the ADNR will adjudicate the water rights after FERC authorizes the Project and the Project becomes operational;
- (3) A Fish Habitat Permit would be obtained from ADF&G for instream work. AEA has consulted extensively with ADF&G during development of the amendment application, and ADF&G has actively participated in agency meetings and site visits;
- (4) An evaluation of potential effects of the Bradley Lake Expansion Project on historical, archeological, and cultural resources has been developed and provided in Exhibit E of this amendment application. This evaluation has been submitted to the SHPO and potentially affected Tribes for their review and comment; and
- (5) A Section 404 permit would be obtained from USACE to discharge dredge or fill materials into waters of the U.S. and wetlands. Any necessary construction conditions or wetland mitigation requirements would be determined during the permitting process. USACE wetland delineation forms have been completed in consultation with USACE to support the permit application.