

BOYCE HYDRO POWER LLC

A W.D. Boyce Trusts Legacy Enterprise

Lee W. Mueller, Member Manager
6000 S. M-30 (PO Box 15)
Edenville, MI 48620
Tel: (989) 689-3161 Fax: (989) 689-3155

23 July, 2020

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**RE: Sanford (P-2785), Secord (P-10809) and Smallwood (P-10810)
Boyce Hydro Power, LLC's Response to Unauthorized "Updated PMF Determination"
filing made by Four Lakes Task Force on July 20, 2020**

Secretary Bose:

On Monday, July 20, 2020, the Four Lakes Task Force (FLTF) filed a Project Safety Compliance Report on the FERC e-Library called an "Updated PMF Determination¹," purporting to be on behalf of Boyce Hydro Power, LLC as the Lead Applicant for Projects P-2785 (Sanford), P-10809 (Secord), P-10810 (Smallwood), and a Preliminary Permit application for Edenville (P-14999). This report was commissioned by FLTF, without any involvement or consultation with Boyce Hydro Power, LLC (BHP) (the licensee). While it would be appropriate for a prospective licensee (in the case of Edenville) to submit such a report for that project, it is highly inappropriate to represent that FLTF's self-serving opinions are coming from the Licensee, ***which they are not***. This letter notifies FERC that FLTF is not the "Agent" for Boyce Hydro Power, LLC, and any filings made by them under these auspices should be rejected or submitted privately to BHP for verification prior to posting.

Boyce Hydro Power, LLC did not request this study, FERC did not require it, and Boyce, as licensee, is entitled to independently review its findings **before it becomes public record**.

We view FLTF's filing of this document as a tortious interference by FLTF to undermine the Licensee's relationship with the regulator and to impair BHP's business. This is a blatant attempt on the part of FLTF to devalue these Projects in order to justify taking them in condemnation for no consideration. As such they are placing FERC squarely in the middle of this dispute.

Boyce respectfully requests that FERC remove this imposter filing from the e-Library altogether. It is not the Licensee's filing for the three licensed projects. If FLTF wishes to post a document on the e-Library for the pending Preliminary Permit Application (P-14999) for Edenville, they are of course free to do so, under their own business name.

Very truly yours,



Lee W. Mueller, Member Manager
Boyce Hydro Power, LLC

¹ Accession number 20200720-5031