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June 22, 2006

Via Hand Delivery

ORIGINAL

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

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FILED
OFFICE OF THE
SECRETARY

**Re: Project No. 12687 – Deception Pass Tidal Energy Project
Competing Application of the Snohomish County PUD for Preliminary Permit**

Dear Secretary Salas:

Following a conversation with Commission staff, Snohomish PUD wishes to update the filing of a competing preliminary permit application for the proposed Deception Pass Tidal Energy Project, submitted to the Commission on June 14, 2006 (P-12687), to provide additional detail about Snohomish PUD's estimates of the turbine installation prospects at the Agate Passage site. Snohomish PUD wishes to replace the final paragraph of Section 4 of Exhibit 1 with the following:

For the purposes of the preliminary permit application, the following turbine parameters have been assumed:

- Horizontal axis turbine with 20m diameter rotor
- One radius (10m) lateral spacing between units to prevent flow blockage
- Ten diameters (200m) downstream spacing to allow turbine wake to dissipate
- Seabed clearance of 8m to keep turbine rotors above the less energetic boundary layer
- Overhead clearance of 3m at LAT (lowest astronomical tide) to allow clearance by pleasure craft and small fishing vessels

Note that these specifications are preliminary and are subject to change due to device selection and detailed engineering design. For example, if deeper draft vessels make use of the Deception Pass Narrows, overhead clearances would have to be appropriately increased. With the above specifications, four (4) turbines could be sited in the Deception Pass Narrows (two groups of two). If the above specifications are adjusted to account for a turbine with a 10m diameter rotor, the number of turbines that could be sited in the Deception Pass Narrows could be as

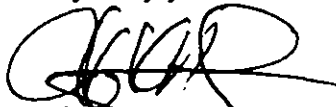
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high as twenty (20). If smaller diameter devices are chosen, the number of devices deployed would increase.

Regardless of the type, size, and number of turbines installed, the environmentally extractable limit of 3 MW cannot be exceeded. Therefore, performance for any array approaching the extraction limit (regardless of type and number of turbines) will be close to the one given above.

A copy of this letter is also being sent via First Class mail to those individuals and agencies listed below. Should you have any questions or concerns, please contact me at (425) 783-8250.

Very truly yours,



Jeffrey R. Kallstrom
Senior Counsel

Cc: Charles B. Cooper, TRC Environmental
Joseph A. Cannon, Pillsbury Winthrop Shaw Pittman LLP
Federal Energy Regulatory Commission, Portland Regional Office
U.S. Army Corps of Engineers, North Pacific Office
Department of the Interior, Office of Environmental Affairs
Oregon State Director, Bureau of Land Management
William C. Frymire, Attorney General Of Washington
Charlene A. Andrade, Washington Dept. of Fish & Wildlife
Gary R. Sprague, Washington Dept. of Fish & Wildlife
Roger A. Braden, Office of the Attorney General
Steve Jennison, Department of Natural Resources

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing filing in accordance with Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission.

Dated at Everett, Washington, this 22nd day of June, 2006.

/s/ Ray Finnen
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