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The Honorable Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Room 1A, East  
Washington, D.C. 20426

FEDERAL ENERGY  
REGULATORY COMMISSION

**RE: Oceana Energy Company – Dockets: P-12663-000, P-12664-000,  
P-12665-000, P-12-666-000, P-12670-000; P-12672-000,  
P-12694-000, P-12695-000, P-12696-000, P-12697-000,  
P-12705-000**

Dear Secretary Salas,

I write in opposition to the Protests of Verdant Power, LLC, and in support of the applications of Oceana Energy Company and its subsidiaries for preliminary permits in the above matters.

For the past six weeks, I have been conducting due diligence for a major private equity Fund interested in being the lead investor in Oceana both short-term (technology testing and site evaluation) and also longer term in connection with actual development and generation of power at its sites. Together with two recognized experts in the field of current and tidal technology and several financial analysts, I have been examining the leading players in the industry, the major existing technologies (machines) in the world, and particularly the capability of Oceana to be the leader in this field in the United States.

Based on this examination, the Fund I represent is seriously interested in providing major capital to Oceana and believes that Oceana has by far the best chance of exploiting tidal energy in the United States in the next decade.

First, Oceana has a proprietary technology that may well be more efficient, less expensive to construct and more environmentally benign than the other two technologies currently under development (Verdant and Marine Current Turbines). Oceana has entered into agreements for the US Navy and NASA to test and validate its machine on a very accelerated basis, and assist in field testing it in San Francisco. In addition, Oceana is working to negotiate partnership relationships with local utilities in municipal areas like San Francisco that will involve local participation in completing the licensing process and in efforts to seek additional funding. Thus, substantial funding may be available from the federal government and state sources for technology testing, and independent government research scientists will validate that testing.

Second, Oceana has the contacts with industry in Utah, federal and state governments, the environmental community and funders to move forward at multiple sites simultaneously. While the principals of Oceana have sufficient resources to fund their business plan for the next eighteen months with government and private partners - - a capacity no other player in the field now appears to have - - Oceana also has the greatest chance to attract the major capital infusion that the Fund I represent is presently considering.

Third, Oceana can afford with its San Francisco and other sites to be "technology-neutral," that is, to rent sites, license technology of others, and otherwise test all other leading technologies against its own, and pick the winning technology. Thus, only Oceana is likely to actually move forward on any kind of accelerated national program to exploit the major opportunities to demonstrate the feasibility of tidal power generation in the country in the next few years.

It appears to us that Oceana has submitted fully-qualified preliminary permit applications, and that no other company or objector has anywhere near a similar capacity. Were FERC to reject otherwise-qualified applications for a small suite of sites that Oceana has full capability to evaluate and test, the likely impact will be to set back the goal of exploring and harnessing this important new source of clean and renewable energy for many years.

Having served as Chairman of the White House Council on Environmental Quality for two and half years, I became acutely aware of how difficult it is for government to assist in the development of a major new clean energy source. In the case of Oceana, it has gathered and will continue to attract the professional, technical and financial resources in the marketplace to lead in this field, nationally and perhaps internationally. It does not require FERC's assistance, only a level playing field and a fair assessment from FERC as to whether its preliminary permit applications meet statutory and agency requirements. It appears to us that they do, and that the preliminary permits should be granted.

Sincerely,

  
George T. Frampton, Jr.