

Via Electronic Filing

August 14, 2013

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426 Northfield Mountain Station 99 Millers Falls Road Northfield, MA 01360 Ph: (413) 659-4489

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John S. Howard

Director- FERC Hydro Compliance

Re: Northfield Mountain Pumped Storage Project, FERC Project No. 2485-063

Turners Falls Hydroelectric Project, FERC Project No. 1889-081

Filing of Revised Study Plan

Dear Secretary Bose:

Pursuant to the regulations of the Federal Energy Regulatory Commission (Commission or FERC), Title 18 Code of Federal Regulations (18 C.F.R.) § 5.13, FirstLight Hydro Generating Company (FirstLight), a subsidiary of IPR-GDF SUEZ North America, Inc., Licensee of the Turners Falls Hydroelectric Project (FERC No. 1889) and the Northfield Mountain Pumped Storage Project (FERC No. 2485), encloses for filing the Revised Study Plan (RSP) for the relicensing of the Turners Falls Project and Northfield Mountain Project. In addition to the "clean" version of the RSP, FirstLight is also filing a "track-change" version (excluding appendices and attachments), which reflects changes between the Updated Proposed Study Plan and RSP. Note that for two geology and soil study plans (3.1.1 and 3.1.2) the changes were so extensive that only a clean version is provided. In addition, two new studies have been added to the RSP including 3.1.3 Northfield Mountain Project Sediment Management Plan and 3.7.3 Traditional Cultural Properties Study.

Pursuant to 18 C.F.R. § 5.11 of the Commission's regulations, FirstLight filed its Proposed Study Plan (PSP) on April 15, 2013, and distributed the PSP to interested resources agencies and stakeholders for review and comment. In addition, pursuant to 18 C.F.R. § 5.11(e), FirstLight held a study plan meeting on May 14, 2013 in which all of the proposed studies and studies not being proposed were briefly discussed. Thereafter, FirstLight held ten¹ resource-specific study plan meetings to allow for more detailed discussions on each proposed study plan and on studies not being proposed. In addition, FirstLight met with the Narragansett Tribe on June 6, 2013 to discuss proposed studies. All meeting dates and notices as well as PowerPoint materials for these meetings were published on FirstLight's website http://www.northfieldrelicensing.com. FERC attended these meetings in person and/or via teleconferencing as did numerous stakeholders. FirstLight agreed at these meetings to update the PSP and file with the Commission a single Updated PSP.

On June 28, 2013, FirstLight filed with the Commission an Updated PSP to reflect further changes to the PSP based on comments received at the nine meetings. The same was posted to FirstLight's website.

¹ The ten meetings were held on May 14, 15, 21, and 22, and June 4, 5, 11, 12, and 14, and August 8.

On or before July 15, 2013, stakeholders provided written comments on FirstLight's Updated PSP, pursuant to 18 C.F.R. § 5.12 of the Commission's regulations, including the following entities:

- United States Fish and Wildlife Service
- National Marine Fisheries Service
- Environmental Protection Agency
- Massachusetts Department of Environmental Protection
- Massachusetts Division of Fisheries and Wildlife and Massachusetts Natural Heritage and Endangered Species Program
- New Hampshire Department of Environmental Service
- Vermont Agency of Natural Resources
- National Park Service
- · American Whitewater
- New England FLOW

- Appalachian Mountain Club
- Connecticut River Watershed Council
- The Nature Conservancy
- Trout Unlimited
- Franklin Regional Council of Governments
- Franklin Conservation District
- Landowners and Concerned Citizens for License Compliance
- Town of Northfield
- Karl Meyer
- The Nolumbeka Project, Inc.
- Lisa McLoughlin and Warren Ondras
- Town of Montague Fire Chief
- Vermont Division of Historic Preservation

In addition to the above, seven individuals filed comments seeking a feasibility study of a closed-loop system for the Northfield Mountain Project. By letter dated July 14, 2013 the Narragansett Indian Tribal Historic Preservation Office requested FirstLight and TransCanada to enter into a cultural resources agreement, to be renegotiated on an annual basis, which would cover funding for: database development and maintenance, facility rental and equipment, cultural resource field survey personnel, including expenses, a senior archaeologist research consultant, and tribal cultural resource oversight. The Tribe copied FERC on its email request to FirstLight and TransCanada but did not file official comments with FERC. FirstLight has responded to the Tribe's request by letter dated August 14, 2013.

In response to these comments, FirstLight made revisions to the Updated PSP, which are reflected in the enclosed RSP. In accordance with 18 C.F.R. §5.13 of the Commission's regulations, FirstLight is hereby submitting the RSP for the Commission's review. FirstLight looks forward to continuing to work with resource agencies and stakeholders on finalizing the study plan for the relicensing of the Turners Falls Project and Northfield Mountain Project. In furtherance of this effort, pursuant to 18 C.F.R. § 5.13(b) of the Commission's regulations, any comments on the RSP must be filed with the Commission by August 29, 2013.

FirstLight is filing the RSP with the Commission electronically. To access the RSP on the Commission's website (http://www.ferc.gov), go to the "eLibrary" link, and enter the docket number P-1889 or P-2485, to access the document. To access the RSP here, navigate to http://www.northfieldrelicensing.com, and click on documents.

In addition to the electronic filing with the Commission, FirstLight is making available to the public the RSP at the Northfield Mountain Visitor Center at 99 Millers Falls Road, Northfield, MA 01360 during regular business hours.

If you have any questions regarding this filing, please feel free to contact me.

Sincerely,

John Howard

FERC- Director Hydro Compliance