



March 9, 2015

VIA ELECTRONIC MAIL

Ms. Kimberly Noake MacPhee
Franklin Regional Council of Governments
12 Olive Street, Suite 2
Greenfield, MA 01301

Re: Proposed List of Sites for Bank Stabilization and Preventative Maintenance
Northfield Mountain Pumped Storage Project and Turners Falls Hydroelectric Project,
FERC Project Nos. 2485 and 1889

Dear Kimberly:

This letter responds to your memorandum dated March 2, 2015 and previous email correspondence requesting FirstLight Hydro Generating Company's (FirstLight) prioritized list of sites for bank stabilization and preventative maintenance in the Turners Falls Impoundment. The list of recommended bank stabilization and preventative maintenance projects FirstLight included in Section 8.3 of the 2013 Full River Reconnaissance (FRR) Report is FirstLight's list of prioritized sites for implementing Phase IV of the erosion control plan (ECP) for the Northfield Mountain Pumped Storage and Turners Falls Hydroelectric Projects (Projects). The proposed sites are fully consistent with the ECP and FirstLight's obligations under its Federal Energy Regulatory Commission (FERC) licenses for the Projects.

As you note in your memorandum, the ECP set forth two criteria for prioritizing sites for erosion control. The primary criterion is imminent or potential threat to structures based on close proximity to the riverbank, using riverbank characteristics. The secondary criterion is a site's contribution of sediment to the river. FirstLight's list of projects proposed in the 2013 FRR—which include both new stabilization and maintenance of previously repaired sites—covers both of these criteria. While the emphasis was on riverbank characteristics under the ECP's primary criteria, a site's contribution of sediment to the river was considered as well. This is particularly true of the recommended sites categorized as experiencing active erosion and extensive erosion. FirstLight's approach to site selection is consistent with the approach it has used for the past 15 years to identify sites for stabilization and preventative maintenance.

John S. Howard
Director FERC Compliance, Hydro

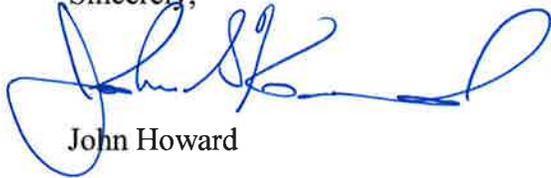
FirstLight Power Resources, Inc.
99 Millers Falls Road
Northfield, MA 01360
Tel. (413) 659-4489/ Fax (413) 422-5900/
E-mail: john.howard@gdfsuezna.com

In selecting the recommended sites set forth in the 2013 FRR, FirstLight also considered its requirement to keep pace with the rate of erosion in the Turners Falls Impoundment—an obligation FERC has emphasized regardless of the criteria for site selection. FirstLight also considered what it could reasonably accomplish prior to the expiration of the Project licenses in 2018.

To that end, as FirstLight noted in previous correspondence, the current permitting process is very involved and takes considerably more time and effort than it previously did when the ECP was first implemented. This is particularly true in the case of the Shearer site, for which FirstLight has been unable to obtain the necessary approvals from the Town of Northfield Conservation Commission. The Commission is re-opening the hearing on the Shearer site later this month.

FirstLight remains committed to consulting with members of the Connecticut River Streambank Erosion Committee prior to initiating permitting for the sites recommended for stabilization and preventative maintenance for the remainder of the Projects' current license terms. We look forward to our April meeting to further discuss these sites.

Sincerely,



John Howard

cc: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission