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Northfield Mountain/Turners Falls Projects

April 12, 2019

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485). Schedule for Amended License Application.

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) owns and operates the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight is in the process of relicensing the facilities with the Federal Energy Regulatory Commission (FERC). The purpose of this letter is to update FERC on FirstLight's plans for conducting additional environmental studies in 2019 in support of an Amended License Application which FirstLight plans to file by April 30, 2020.

On August 10, 2018, FERC issued a revised process plan and schedule for the relicensing. Under the revised schedule, FERC would issue its final Director's Determination on any remaining study plan disagreements or proposed modifications by July 13, 2019. The date for FirstLight to file its Amended License Application was left open, as FirstLight had previously informed the Commission that it would amend its April 2016 License Application after completing additional field work, consultation, and analyses on studies that were not complete when the application was filed.

In addition to completing work determined by FERC to be necessary under the FERC-approved Integrated Licensing Process study plan, FirstLight has completed the following additional studies:

- Northfield Mountain Station CFD Modeling for Fish Exclusion Net Forces. FirstLight proposes to file this report by June 1, 2019.
- eDNA study for Shortnose Sturgeon in the Turners Falls Impoundment. FirstLight filed this report with FERC on November 8, 2018.

For 2019, FirstLight needs to finish all work as set forth in FERC's January 22, 2019 study plan determination, as well as certain Phase II archaeological surveys that remain outstanding. If FERC's July 13, 2019 Director's Determination indicates FirstLight will be required to do any additional follow-up work, FirstLight will need to complete that work as well. In addition, FirstLight is planning to carry out further upstream and downstream shad passage studies in 2019 building on the 2016 and 2018 ultrasound array studies. On March 12, 2019, FirstLight filed with FERC its proposed 2019 Ultrasound Array Control

Study¹. The study will be conducted in May 2019 and FirstLight expects to file the report by October 15, 2019.

FirstLight also continues to meet with federal and state resource agencies and other stakeholders on a variety of issues to inform its preparation of the Amended License Application. FirstLight also is FERC's designated non-federal representative for consultation under Section 7 of the Endangered Species Act.

Following completion of studies, FirstLight anticipates that it will need approximately six months to prepare the Amended License Application. Accordingly, FirstLight proposes to file the Amended License Application by April 30, 2020.

In the interest of FERC's coordination of the relicensing of FirstLight's projects with the relicensing of the upstream Wilder, Bellows Falls, and Vernon Hydroelectric Projects, FirstLight has consulted with Great River Hydro, LLC (Great River Hydro), the licensee of those projects, to ensure that FirstLight's proposed schedule is consistent with the progress of Great River Hydro's relicensings. On February 19, 2019, FERC issued a revised process plan and schedule for Project Nos. 1892, 1855, and 1904 under which FERC's final Director's Determination would be issued by September 17, 2019, approximately two months after FirstLight's final Director's Determination. While FirstLight is not aware of precisely when Great River Hydro plans to file its Amended License Application, based on the similar schedules FirstLight believes that its proposed date of April 30, 2020 for filing of its Amended License Application will not create any significant discrepancy with the schedule for Wilder, Bellows Falls, and Vernon.

If you have any questions regarding the enclosed material, please call me at the number above.

Sincerely,



Douglas Bennett
Director of MA Hydro Operations

¹ In the letter transmitting the 2019 Ultrasound Array Control Study Plan, FirstLight stated that it was not seeking FERC to issue a Determination on the study.