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Nick Hollister
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July 2, 2021

Via Electronic Filing

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

Re: FirstLight MA Hydro LLC, Turners Falls Hydroelectric Project (FERC No. 1889)
Northfield Mountain LLC, Northfield Mountain Pumped Storage Project (FERC No. 2485).
Response #3 to FERC January 14, 2021, Letter Regarding Additional Information Requests
Corrections to typos in Table TF-AIR#4-2 and 4-5 in the FirstLight filing of June 23, 2021

Dear Secretary Bose:

On December 4, 2020, FirstLight MA Hydro LLC, owners of the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889) and Northfield Mountain LLC, owners of the Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485 filed with the Federal Energy Regulatory Commission (FERC) Amended Final License Applications (AFLA) for the two projects.

Background

On January 14, 2021, FERC issued separate letters to FirstLight MA Hydro LLC and Northfield Mountain LLC requesting the Licensees (collectively FirstLight) address deficiencies and additional information requests (AIRs) for each Project. On March 15, 2021, FirstLight filed its response to the deficiencies and most AIRs. In its March 15, 2021 letter, FirstLight noted that responses to the AIRs required information on energy impacts, water levels, flows and Northfield Mountain pumping/generation volumes under FirstLight's AFLA operating proposal.

On June 23, 2021, FirstLight filed their responses as listed below.

- TF AIR#4 and NFM AIR#3: FirstLight quantified the annual energy impact due to various operating conditions (bypass flows, ramping rates, etc.) included in its AFLAs under proposed operations.

- TF AIR#5: FirstLight provided simulated hourly water surface elevations in the Turners Falls Impoundment, flows in the bypass reach, and flow and water surface elevations below Cabot Station under baseline and proposed operations.

- TF AIR#13: FirstLight provided water level duration curves at sensitive plant locations under proposed operations.

- TF AIR#14: FirstLight explained how proposed operations would affect special status plants. NFM AIR#4: FirstLight provided estimated weekly and monthly pumping volume under proposed operations.

Recently, typos were noticed in Tables TF-AIR#4-2 and TF-AIR#4-5 and the corrections are shown in the attachment. These typos do not change the incremental difference columns in the tables.

If you have any questions regarding the enclosed, please do not hesitate to contact me at the telephone number on the cover sheet.

Respectfully,

Nick Hollister
Senior Operations Manager, North

Attachment: Corrections to Table TF-AIR#4-2 and Table TF-AIR#4-5.

Table TF-AIR#4-2: Summary of Generation Impacts at Northfield Mountain Assuming GRH ROR

Scenario[1]	Average Annual Total Generation (MWH)	Average Annual Peak Hours Generation (MWH)	Incremental Difference[2]			
			Average Annual Total Generation		Average Annual Peak Hours Generation	
			(MWH)	(%)	(MWH)	(%)
Baseline	938,197	925,588	-	-	-	-
GRH Operations	939,906	925,934	+1,709	+0.2%	+346	+0.0%
NFM Operations	939,906	~~981,166~~ 925,934	0	0.0%	0	0.0%
Bypass Flows	939,906	~~981,175~~ 925,934	0	0.0%	0	0.0%
Cabot Operations	939,906	~~981,179~~ 925,934	0	0.0%	0	0.0%
Ramping	939,906	~~981,179~~ 925,934	0	0.0%	0	0.0%

Notes:

1. The operating conditions for a given scenario build upon the conditions for all previously listed scenarios. For example, the Bypass Flows scenario includes conditions from the GRH Operations and Northfield Mountain Operations scenarios.
2. The incremental difference is the difference between that scenario and the previous scenario. For example, the incremental difference in Total Generation (MWH) for the Bypass Flows scenario is the difference between the Total Generation (MWH) in the Bypass Flows and Northfield Mountain Operations scenarios.

Table TF-AIR#4-5: Summary of Generation Impacts at Turners Falls Assuming GRH Peaking using +/-0.5 feet of Storage

Scenario[1]	Average Annual Total Generation (MWH)	Average Annual Peak Hours Generation (MWH)	Incremental Difference[2]			
			Average Annual Total Generation		Average Annual Peak Hours Generation	
			(MWH)	(%)	(MWH)	(%)
Baseline	~~938,197~~ 296,754	~~925,588~~ 213,317	-	-	-	-
GRH Operations	296,270	214,607	-484	-0.2%	1,290	0.6%
NFM Operations	296,270	214,607	0	0.0%	0	0.0%
Bypass Flows	265,265	193,108	-31,005	-10.4%	-21,499	-10.1%
Cabot Operations	265,383	192,540	+118	+0.0%	-568	-0.3%
Ramping	265,400	192,311	+17	+0.0%	-229	-0.1%

Notes:

1. The operating conditions for a given scenario build upon the conditions for all previously listed scenarios. For example, the Bypass Flows scenario includes conditions from the GRH Operations and Northfield Mountain Operations scenarios.
2. The incremental difference is the difference between that scenario and the previous scenario. For example, the incremental difference in Total Generation (MWH) for the Bypass Flows scenario is the difference between the Total Generation (MWH) in the Bypass Flows and Northfield Mountain Operations scenarios.