



Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360
Ph.: (413) 659-4489
Fax: (413) 659-4469
Email: nick.hollister@firstlightpower.com

Nick Hollister
Senior Operations Manager, North

August 4, 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 #4 to FERC January 14, 2021 Letter Regarding Additional Information Requests

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. FirstLight has filed three additional information requests (AIRs). On July 23, 2021, FERC contacted FirstLight requesting clarification on its June 23, 2021 AIR filing. FERC's three requests and FirstLight's responses are below.

Turners Falls Hydroelectric Project:

FERC Comment

The operations data filed on June 23, 2021, in response to item 5 of Schedule B of Commission staff's January 14, 2021 letter, has identical values for flow immediately downstream of Turners Falls Dam (in "TFD Discharge.xlsx") and the total bypassed reach (in Total Bypass Flow.xlsx), which includes Station No. 1 discharge according to the amended final license application. All of these flows are at least as high as corresponding Station No. 1 flows (in Station No.1 Discharge.xlsx) and the column headings imply that they represent total bypassed reach flows. Therefore, we believe that the total bypassed reach flows were mistakenly provided as Turners Falls Dam flows. To correct this error, please provide the correct Turners Falls Dam flows for each of the three operational scenarios presented in the spreadsheets.

FirstLight Response

When FirstLight was creating the smaller Excel files, it appears that the TFD Discharge.xlsx file was overwritten with data representing the Total Bypass Flow. FirstLight is filing the corrected spreadsheet (filename: Reach 1 TFD corrected July 2021.xlsx) along with this response.

Northfield Mountain Pumped Storage Project

FERC Comment

Item 4 of Schedule B of Commission staff's January 14, 2021 letter requested additional information on weekly and/or monthly pumping flow volumes for both current and proposed operations in a typical year. In its June 23, 2021 response, Northfield Mountain provided "the average monthly volumetric flow rate of water pumped by Northfield Mountain over the 42-year period of record analyzed (i.e. 1962-2003)." However, the Northfield Mountain Project was not fully operational until 1974 (commercial operations began on: November 30, 1972 at unit 4; February 28, 1973 at unit 1; July 25, 1973 at unit 2; and October 8, 1973 at unit 3). If the average flow rates in the June 23, 2021 response include any year(s) prior to 1974, please refile the table using data from only 1974-2003.

FirstLight Response

The values provided were not based on historical observations, but rather based on the pump-gen schedule utilized in the operations model to simulate current and proposed conditions. The same pump-gen schedule was used throughout the simulation; it did not vary from year-to-year. However, the pump-gen schedule did vary between the current and AFLA proposed conditions, as an expanded Upper Reservoir operating range is being proposed. The operations model utilizes the hydrologic period 1962 through 2003 for simulations and includes Northfield Mountain Project operations throughout this 42-year simulation period. Even though the Northfield Mountain Project was not operable until 1974, the operations model predicts what would have happened had the Northfield Mountain Project been operable starting in 1962, when the simulation model starts.

FERC Comment

It is unclear whether the monthly average pumping rates provided in Northfield Mountain's June 23, 2021 response to item 4 of Schedule B of Commission staff's January 14, 2021 letter were calculated over the entire month (i.e., using 24-hour days) or just during pumping operations. Please clarify whether these averages are based on just the pumping periods. If they are based on just the pumping periods, then please also provide the monthly averages for the number of hours of pumping to enable calculation of the volume pumped.

FirstLight Response

The monthly average pumping rates were calculated over the entire month (i.e., using 24-hour days). Please note that rates were provided rather than volume so as to not mischaracterize the average volume during the month of February, since the average results were for a 42-year period of simulated record which includes several leap years.

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