



April 3, 2017

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, FERC Project Nos. 2485 and 1889
Filing of Addendums

Dear Secretary Bose:

On October 14, 2016, FirstLight Hydro Generating Company (FirstLight) filed 10 study reports with the Federal Energy Regulatory Commission (FERC or Commission) as part of its relicensing of the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight held its study meeting on October 31 and November 1, 2016 and filed its meeting minutes on November 15, 2016. Stakeholder comments on the studies were filed by December 15, 2016 and FirstLight filed its responsiveness summary on January 17, 2017. In its responsiveness summary, FirstLight agreed to file addendums on several studies including the following being filed today:

3.1.2 *Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability.* Three items are being filed relative to Study No. 3.1.2 as follows:

- FirstLight is reissuing the full Erosion Causation report due to two transects being inadvertently flipped. Note that the findings of the study have not changed from the October 2016 report.
- FirstLight is filing its analysis of expanded use of the Upper Reservoir on potential shoreline erosion of the Turners Falls Impoundment.
- FirstLight is filing a response to the Massachusetts Department of Environmental Protection (MADEP) comment letter dated December 14, 2016 on the Erosion Causation Report. The letter states “*MassDEP would like FirstLight to provide an explanation of the additional modules used in the B-stem Model which are not typical of a B-Stem Model and the effect of those modules on the B-Model and results*”. FirstLight has provided a response to this inquiry.

3.3.1 *Instream Flow Study in Bypass Reach and below Cabot Station-* Addendum 1. As noted in FirstLight’s responsiveness summary, FirstLight had a conference call with the Massachusetts

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Natural Heritage and Endangered Species Program (NHESP) and the United States Fish and Wildlife Service (USFWS) to discuss the evaluation of mussels in Reach 5. As part of its January 17, 2017 filing, FirstLight included minutes from the conference call and a proposed method for evaluating mussels. NHESP and USFWS provided comments on FirstLight's proposed method on February 27, 2017. FirstLight will be consulting these parties again to discuss their comments. As such, no analysis for mussels has been included in this Addendum 1; however, we have addressed other comments in this filing relative to habitat time series and evaluating additional flows as part of the steady-state analysis.

3.3.16 *Habitat Assessment, Surveys and Modeling of Suitable Habitat for State-Listed Mussel Species in the Connecticut River below Cabot Station* (the issues raised on this study are addressed in Study No. 3.3.1).

3.5.1 *Baseline Inventory of Wetland, Riparian, and Littoral Habitat in the Turners Falls Impoundment, and Assessment of Operational Impacts on Special-Species Status-* Addendum 2 (FirstLight filed Addendum 1 on this study on October 1, 2016).

Study Report Availability

FirstLight is filing these addenda with the Commission electronically. To access the addenda on the FERC website (<http://www.ferc.gov>), go to the "eLibrary" link, and enter the docket number, P-1889 or P-2485, to access the document. FirstLight is also making the addenda available for download at the following website: <http://www.northfieldrelicensing.com>.

If you have any questions, or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gus Bakas", written over a faint, light-colored signature line.

Gus Bakas