



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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In Reply Refer To:

June 13, 2013

FirstLight Hydro Generating Company
Turners Falls Hydroelectric Project, FERC No. 1889
Northfield Mountain Pumped Storage Project, FERC No. 2485
TransCanada Hydro Northeast Inc.
Vernon Hydroelectric Project, FERC No. 1904
Bellows Falls Hydroelectric Project, FERC No. 1855
Wilder Hydroelectric Project, FERC No. 1892

EXTENSION OF TIME REQUEST TO COMMENT ON PROPOSED STUDY PLANS

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Dear Secretary Bose:

We are respectfully requesting an extension of time until July 30, 2013, to provide final comments on the Draft Proposed Study Plans (PSP) being developed for the Turners Falls (FERC No. 1899), Northfield Mountain Pumped Storage (FERC No. 2485), Vernon (FERC No. 1904), Bellows Falls (FERC No. 1855), and Wilder (FERC No. 1892) projects.

Background

The Commission's Integrated Licensing Process schedule for the relicensing of the five subject projects requires filing of final comments on the draft PSP's by July 15, 2013. Draft PSPs were filed on schedule by FirstLight Generating Company (FirstLight) and TransCanada Hydro Northeast, Inc (TransCanada) on April 15, 2013. The PSP submitted by FirstLight included 35 individual study plans and TransCanada's filing included 33 individual study plans.

Subsequent to the filing of the PSP's, a series of meetings were scheduled by each applicant to review each plan with interested parties. Given the number and complexity of the issues being addressed, FirstLight scheduled and conducted eight full day meetings and TransCanada six full day meetings between May 13, 2013 and June 7, 2013. For most of the studies proposed by both applicants, there were substantial technical comments and recommendations provided by the

Service and other parties at the meetings. Both applicants either proposed or agreed to changes to the proposed study plans, or acknowledged the need to expand on, clarify or modify the proposed study plans based on comments from participants or the FERC staff in attendance. As such, both applicants have acknowledged that their PSP's submitted on April 15, 2013 will be substantially modified and re-submitted. FirstLight and TransCanada have indicated that they will submit these revised PSPs by June 21 and July 8 respectively.

Simultaneous to the PSP development and review, FirstLight has been developing a final detailed Instream Flow Study Plan (IFSP) which will be conducted this summer/fall. FirstLight is also requesting comments on their revised IFSP and has coordinated with the interested parties to schedule the initial fieldwork for the study in early July, 2013.

Extension of Time Request

We are requesting a two-week extension of time to submit our comments on the final PSPs for the following reasons:

- Providing thoughtful and well-structured comments and recommendation on the PSPs is important to the Commission staff's review of the PSPs and would ultimately help assure that all the information needed for informed licensing decisions is gathered through the two years of studies.
- The revised PSPs for each study will in many cases be major revisions to the PSPs filed in April. Substantial changes to the initial study proposals are being contemplated and a much greater level of detail not initially provided will be added to all the PSPs. Therefore, on many individual study plans, substantial review will be needed
- The dates proposed by both applicants to file the revised PSPs will not provide the Service with the time necessary to properly review the volume of new information and provide meaningful comments by the Commission's July 15 due date. TransCanada indicates that they will post revised individual study plan re-drafts for review as they complete them, but they can only commit to having all modified individual study plans completed by July 8, 2013¹.
- A number of stakeholders (including the Service) believe it is imperative to participate in the field reconnaissance portion of the Instream Flow Study at the Turners Falls Project. Due to agency staff availability, FirstLight has scheduled the field reconnaissance to occur during the week of July 7th. FirstLight anticipates the field reconnaissance will take three full days to complete (if there are rain or flow issues, the field work would move to the following week), leaving even less time to develop thorough comments on the PSPs. The IFSP review and fieldwork will limit the time Service staff can dedicate to the PSP reviews.

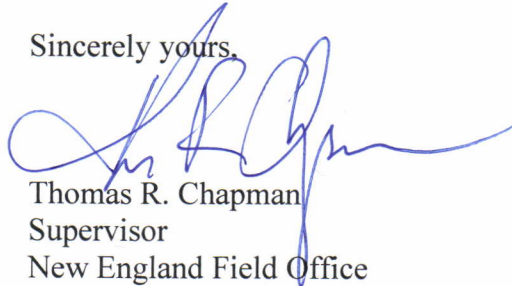
¹ John Ragonese, TransCanada Hydro Northeast, Inc, personal communication, June 12, 2013

- A modest delay of the study plan review process will not interfere with the execution of the studies proposed in PSP or ordered by the Commission as most studies will not be conducted until the spring of 2014 or later.

For the reasons cited above, a modest extension of time of two weeks to file comments on the revised PSP's is being requested. An extension until July 30, 2013 would assure that the Service has sufficient time for technical review and comment on the PSPs while also accommodating the execution of FirstLight's Instream Flow Study.

We appreciate your consideration of this request. If you have any questions regarding this request, please contact John Warner of this office at 603-223-2541, ext. 15.

Sincerely yours,



Thomas R. Chapman
Supervisor
New England Field Office

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