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John S. Howard
Director- FERC Hydro Compliance

June 27, 2013

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

Re: Northfield Mountain Pumped Storage Project, FERC Project No. 2485
Turners Falls Hydroelectric Project, FERC Project No. 1889
Schedule for Filing 2013 Full River Reconnaissance Report

Dear Secretary Bose:

FirstLight is required by the Federal Energy Regulatory Commission (Commission) to conduct a Full River Reconnaissance (FRR) Study every 3-5 years in accordance with the Northfield Mountain Project's Erosion Control Plan (ECP) and to satisfy compliance requirements associated with the Turners Falls Project and Northfield Mountain Project licenses (FERC No. 2485 and 1889 respectively). By letter dated May 3, 2012, Commission Staff approved FirstLight's July 2011 proposal to conduct the next FRR in the fall of 2013, with the final FRR report due April 2014.

Since the issuance of Commission Staff's 2012 letter approving the schedule for the 2013 FRR, FirstLight initiated the relicensing of both facilities using the Integrated Licensing Process (ILP). As part of this process, Commission Staff subsequently requested FirstLight to fold the 2013 FRR into the ILP by conducting the 2013 FRR as a relicensing study. FirstLight therefore included the 2013 FRR in its Proposed Study Plan (PSP), which was filed with the Commission on April 15, 2013 (*Study 3.1.1 2013 Full River Reconnaissance Study*).

In light of this development, FirstLight now proposes to submit the FRR study report in September 2014 in accordance with the time line applicable to other relicensing study reports. This will make the licensing process more efficient and effective because FirstLight will not be distracted by the need to complete and file the final FRR report, and then respond to comments, during a period when it is conducting field studies and preparing the September 2014 study reports. Also, modifying the FRR report due date as proposed will not affect the erosion control compliance work that is scheduled for 2013 (stabilize Wallace/Watson site) or 2014 (maintenance of Shearer site).


FirstLight's proposal is fully consistent with the ILP regulations, which require license applicants to file the initial study reports together, not as studies are completed. Some participants have suggested that they would prefer not to have their overall study plan comment workload augmented by commenting on the 2013 FRR report at the same as the other relicensing study reports. However, the same argument could be made by any participant with respect to any study where there is the possibility of a report being filed

earlier than the ILP schedule calls for. FirstLight believes there is insufficient justification to depart from the ILP requirements for the FRR study report.

FirstLight also notes that there is no objective reason why the final FRR report needs to be filed in April 2014. That date was proposed initially by FirstLight in July 2011, nearly two years ago and well before the Pre-Application Document was filed, comments were received, the Commission requested FirstLight to conduct the FRR as a relicensing study, and the PSP was developed. At that point, FirstLight could not know the full extent of the study requests that would be made and the accompanying workload, nor could it anticipate the Commission Staff's decision that the FRR should be rolled into the relicensing process. FirstLight's proposal is simply a pragmatic effort to adjust to current conditions in these unusual circumstances.

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 "John S. Howard". The signature is fluid and cursive, with the first name "John" being the most prominent.

John S. Howard
Director - FERC Hydro Compliance

cc: Distribution List

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