

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, DC 20426

June 28, 2013

OFFICE OF ENERGY PROJECTS

TransCanada Hydro Northeast Inc.

Project No. 1892 -026 New Hampshire -
Vermont

Project No. 1855-045 New Hampshire -
Vermont

Project No. 1904 -073 New Hampshire-
Vermont

FirstLight Power Resources

Project No. 2485- 063 Massachusetts

Project No. 1889- 081 Massachusetts

To the Parties Addressed:

Reference: Extension of Time Request

In a letter filed June 13, 2013, the U.S. Fish and Wildlife Service (FWS) requested a 15-day extension-of-time (EOT), to July 30, 2013, to file comments on FirstLight Power Resources' (FirstLight) proposed study plans for the Turners Falls (P-1899), and Northfield Mountain Pumped Storage (P-2485) projects, and on TransCanada Hydro Northeast Inc.'s (TransCanada) Vernon (P-1904), Bellows Falls (P-1855), and Wilder (P-1892) projects.

TransCanada and FirstLight (licensees) filed their proposed study plans on April 15, 2013, and held initial study plan meetings on May 13 and May 14, 2013, respectively. The licensees also held additional study plan meetings to provide additional detail on methodology, and to seek resolution of outstanding study plan issues. As a result of these efforts, the licensees plan to file more detailed proposed study plans with the Commission prior to the July 15, 2013 deadline for stakeholder comments.¹

FWS requests the EOT based on four points: (1) given that the updated proposed study plans are still pending, granting of the EOT will allow for thoughtful, well-structured comments and recommendations on the updated proposed study plans; (2) as a result of the extensive stakeholder meetings and comments, it is anticipated that the

¹ FirstLight intends to file its updated proposed study plan during the week of June 24, 2013, and TransCanada intends to file its updated proposed study plan the week of July 7, 2013.

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licensees' updated proposed study plans will have substantial changes from the initial study plans; (3) during the week of July 7, 2013, FirstLight has scheduled three full days of field reconnaissance to support the continued development of the proposed Instream Flow Study between Turners Falls dam and the Deerfield River confluence;² and (4) the requested EOT would not delay implementation of the licensees' proposed studies.

Between June 17, 2013 and June 19, 2013, the Massachusetts Division of Fisheries & Wildlife, Connecticut River Watershed Council, The Nature Conservancy, National Marine Fisheries Service, Trout Unlimited, the New Hampshire Department of Environmental Service, The Vermont Agency of Natural Resources, and the Franklin Regional Council of Governments each supported the FWS' EOT request and requested that the Commission approve the request.

On June 19, 2013, FirstLight filed a letter with the Commission in response to the FWS' request. In its response, FirstLight states that it does not oppose FWS' request for an EOT provided that approval of the EOT would result in a shift in each of the ILP deadlines through the study dispute determination. FirstLight did, however, raise a concern that approval of the EOT request could delay implementation of Study No. 3.3.16 *Habitat Assessment, Surveys, and Modeling of Suitable Habitat for State-Listed Mussel Species in the Connecticut River below Cabot*, which is scheduled to occur immediately after September 13, 2013, when the Director's study plan determination is due.³ As such, FirstLight requested a stand-alone study plan determination for Study 3.3.16 on September 13, 2013, and a separate study plan determination for the remaining studies on September 30, 2013. Similar to FirstLight's response, on June 26, 2013, TransCanada filed a letter addressing the EOT request, stating that it did not object to the EOT, provided that each of the ILP deadlines through the study dispute determination are also shifted.

Although the requested EOT would not delay the implementation of most of the licensees' studies, granting the EOT request would affect the timing and implementation of FirstLight's Study No. 3.3.16. Additionally, I am reluctant to modify ILP deadlines absent an unusual circumstance which does not appear to be the case here. Therefore, the request for a 15-day EOT to file comments on the licensees' proposed study plans is denied.

² FirstLight intends to implement the Instream Flow Study during the 2013 field season prior to the Director's Study Plan Determination in September 2013.

³ FirstLight states that results of Study 3.3.16 will be used in the Instream Flow Study conducted for the Connecticut River reach downstream of the Deerfield River confluence in 2014.

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If you have any questions, please contact Kenneth Hogan at 202-502-8434, or via e-mail at Kenneth.Hogan@ferc.gov.

Sincerely,

Jeff C. Wright
Director
Office of Energy Projects

Addressees:

Thomas R. Chapman, Field Supervisor
U.S. Fish and Wildlife Service
70 Commercial Street, Suite 300
Concord, NH 03301-5087

Caleb Slater
MA Division of Fisheries and Wildlife
100 Hartwell Street, Suite 230
West Boylston, MA 01583

John Ragonese
Relicensing Project Manager
TransCanada Hydro Northeast Inc.
4 Park Street, Suite 402
Concord, NH 03301

Kimberly A. Lutz, Director
The Nature Conservancy
Connecticut River Program
25 Main Street, Suite 220
Northampton, MA 01060

David Deen, River Steward
Connecticut River Watershed Council
15 Bank Row
Greenfield, MA 01301

Kathryn D. Mickett Kennedy
The Nature Conservancy
25 Main Street, Suite 220
Northampton, MA 01060

Louis A. Chairella
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930-2276

Donald Pugh
Trout Unlimited, Deerfield River Chapter
10 Old Stage Road
Wendell, MA 01379

Owen David
Water Quality Certification Program
Watershed Management Bureau
NH Dept. of Environmental Services
29 Hazen Drive
Concord, NH 03302-095

John S. Howard
Director – FERC Hydro Compliance
FirstLight Power Resources
Northfield Mountain Station
99 Millers Fall Road
Northfield, MA 01360

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Peggy Sloan, Director
Franklin Regional Council of Gov.
12 Olive Street, Suite 2
Greenfield, MA 01301-3318

Tom Miner
Franklin Regional Council of Governments
12 Olive Street, Suite 2
Greenfield, MA 01301-3318

Andrea Donlon, River Steward
Connecticut River Watershed Council
15 Bank Row
Greenfield, MA 01301

Brian T. Fitzgerald
Watershed Management Division
VT Agency of Natural Resources
1 National Life Drive
Montpelier, VT 05620-3522

cc: Mailing List

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