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John S. Howard
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October 7, 2013

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 Study Plan Determination Letter, Request for Clarification. FERC Project Nos. 2485 and 1889.

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) is the owner and licensee of the Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485), located on the Connecticut River in Massachusetts. FirstLight is currently relicensing the facilities using FERC's Integrated Licensing Process and filed our Revised Study Plan (RSP) with FERC on August 14, 2013. On September 13, 2013, FERC issued their Study Plan Determination Letter (SPDL) on 20 of FirstLight's proposed 36 studies. The purpose of this filing is to seek clarification on an aspect of one of the 20 studies entitled: Study No. 3.2.2- *Hydraulic Study of Turners Falls Impoundment, Bypassed Reach, and the Connecticut River below Cabot Station.*

On page B-14 of FERC's SPDL it states:

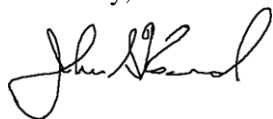
Hydraulic dynamics and water level fluctuations are heavily dependent on hydraulic grade and sharp changes in hydraulic grade. Based on our review of the hydraulic grade line shown in Figure 3.3.2-3 steep changes in hydraulic grade occur near transects 14,000 and 70,000. These transects are either far away or significantly steeper in slope from the closest proposed water level logger. We believe that the calibration and verification of the model would benefit from two additional water level loggers. Providing water level loggers at these two locations would better define the hydraulic dynamics of the impoundment, improve the integrity and reliability of the model results (section 5.9(b)(7)). As such, we recommend additional loggers near Transection station 14,000 (as requested by the Water Council) and another near Transect station 70,000 (section 5.9(b)(6)).

On page 3-81 of our RSP, we include Table 3.2.2-2 describing the location of proposed water level loggers in the Turners Falls Impoundment. As the table describes, FirstLight proposes to install a water level logger at Transect No. 71986.3, located just upstream of Schell Memorial Bridge, near West Northfield Road.

FERC has requested a water level logger at Transect No. 70000, which is also located above Schell Memorial Bridge and is only 1,986 feet downstream our proposed Transect No. 71986.3. FirstLight is seeking clarification on the following: 1) whether FERC is seeking water level loggers at both Transect No. 71986.3 and Transect No. 70000; and 2) whether FERC's needs would be fulfilled if only one water level logger at Transect No. 71986.3 is installed. FirstLight would ideally like to retain a water level logger at Transect No. 71986.3 because we have access and this same location was used to record water level data in 2012, thus allowing us to compare data previously obtained from the same site. If it maintains the logger at Transect No. 71896.3, FirstLight does not believe it is necessary to have an additional logger at Transect No. 70000 in such close proximity.

If you have any questions regarding the clarification sought on this study, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard". The signature is written in a cursive style with a large, looping initial "J".

John Howard

Document Content(s)

Request for Clarification.PDF.....1-2