

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426
December 13, 2013

OFFICE OF ENERGY PROJECTS

Project No. 2485-063 – Massachusetts
Project No. 1889-081 – Massachusetts
FirstLight Hydro Generating Company

Mr. John S. Howard
Director- FERC Hydro Compliance
FirstLight Hydro Generating Company
Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360

Reference: Interim ILP schedule for Study Plan Determination

Dear Mr. Howard:

On September 13, 2013, the Director, Office of Energy Projects, issued the study plan determination for the relicensing of FirstLight Hydro Generating Company's (FirstLight) Turners Falls Hydroelectric and the Northfield Mountain Pumped Storage projects. However, due to Entergy's August 27, 2013 announcement of its plan to decommission the upstream Vermont Yankee Nuclear Power Plant (Vermont Yankee) by the end of 2014, the study plan determination did not address 19 proposed or requested studies pertaining to aquatic resources because implementation of these studies may produce unusable data if conducted while Vermont Yankee is still operating.¹

As a result, on November 25, 2013, we held a technical meeting to obtain more information on the proposed Vermont Yankee decommissioning and listen to comments from FirstLight and stakeholders regarding any necessary adjustments to the proposed and requested study designs and/or schedules. At this meeting we worked with FirstLight and stakeholders to identify: (1) studies not affected by operations of Vermont Yankee, that may be implemented in 2014; (2) studies' likely affected by operations of Vermont Yankee; and (3) studies that may need modification to their methodology due to the decommissioning of Vermont Yankee. A similar meeting was held on November 26, 2013, to discuss TransCanada Hydro Northeast Inc.'s (TransCanada) Wilder (P-1892), Bellows Falls (1855), and Vernon (P-1904) hydroelectric projects.

¹ Appendix A includes a list of the 19 deferred studies, an additional study (study 3.1.2), and summarizes the stakeholder recommended modifications.

Generally, the majority of the stakeholder comments centered on the studies' implementation schedules. In consideration of these comments, we will establish appropriate study-specific implementation schedules in the pending study plan determination. That study plan determination will be issued by February 17, 2014.

In addition to the 19 deferred studies, stakeholders noted that the previously approved study 3.1.2: *Project Impacts on Existing Erosion and Potential Bank Instability*,² did not consider ice process erosional effects within the Turners Falls reservoir.³ As a result, FirstLight requested that it be provided an opportunity to consider whether any modifications to the approved study are needed. Because any modifications to study 3.1.2 for this purpose could not be implemented in 2014 while Vermont Yankee is operational, we recommend that FirstLight evaluate the need for a study modification in consultation with stakeholders during the 2014 study season. FirstLight should present its findings and any proposed modifications to stakeholders, providing 30-days for stakeholder comment, and consider stakeholder input when determining the need for a modification to study 3.1.2. FirstLight should then present its findings and responses to stakeholder comments in its Initial Study Report (ISR) following the 2014 field season.

If FirstLight, determines a study modification or the development of a new study is appropriate, FirstLight should include in the ISR, a detailed study plan modification or proposed new study to evaluate project operational effects on ice process erosion. Through section 5.15 of the Commission's regulations, stakeholders will be afforded an opportunity to comment on the FirstLight's proposed study modifications or new proposed study, or may formally request a new study in the event FirstLight does not propose any modification to the study plan. The Director, Office of Energy Projects will make the final decision on any disputed topics.

Finally, during the November 26, 2013 technical meeting, to discuss TransCanada's Wilder (P-1892), Bellows Falls (1855), and Vernon (P-1904) projects' studies, FirstLight and TransCanada agreed to confer on the need for a new due date for the filing of the ISR in 2014. FirstLight and TransCanada informed Commission staff on December 10, 2013, that the existing deadline, September 13, 2014, is appropriate.

² Approved in the September 13, 2013 Study Plan Determination.

³ Under current conditions stakeholders noted that the Turners Falls reservoir does not freeze during winter months due to the cooling water discharge of the upstream Vermont Yankee Nuclear Power Project.

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If you have any questions regarding this letter please contact Ken Hogan at 202-502-8434, or via email at kenneth.hogan@ferc.gov .

Sincerely,

Timothy J. Welch, Chief
West Branch
Division of Hydropower Licensing

Enclosure: Appendix A – List of studies identified as potentially affected by the decommissioning of Vermont Yankee and discussed during the November 25, 2013 technical meeting.

cc: Mailing List
Public Files

APPENDIX A

LIST OF STUDIES IDENTIFIED AS POTENTIALLY AFFECTED BY THE DECOMMISSIONING OF VERMONT YANKEE AND DISCUSSED DURING THE NOVEMBER 25, 2013 TECHNICAL MEETING

Study	Summary of Stakeholder Recommendations
3.1.2 – Project Impacts on Existing Erosion and Potential Bank Instability	This study was previously approved with modification by FERC in the September 13, 2013 Study Plan Determination; however, the approved study did not contemplate ice process erosional effects. FirstLight to consider how to accommodate the question of potential change in ice conditions and any needed modifications to the study plan.
3.2.1 -- Water Quality Monitoring Study	Conduct Field Work Components in 2015
3.3.1 -- Conduct Instream Flow Habitat Assessments in the Bypass Reach and below Cabot Station	No Change
3.3.2 -- Evaluate Upstream and Downstream Passage of Adult American Shad	Conduct Field Work Components in 2015
3.3.3 -- Evaluate Downstream Passage of Juvenile American Shad	Conduct Field Work Components in 2015
3.3.4 -- Evaluate Upstream Passage of American Eel at the Turners Falls Project	No Change
3.3.5 -- Evaluate Downstream Passage of American Eel	Conduct Radio Telemetry component of Study in 2015
3.3.6 -- Impact of Project Operation on Shad Spawning, Spawning Habitat and Egg Deposition in the Area of the Northfield Mountain and Turners Falls Projects	Conduct Field Work Components in 2015
3.3.7 -- Fish Entrainment and Turbine Passage Mortality Study	Initiate Study in 2015
3.3.10 -- Assess Operational Impacts on Emergence of State-Listed Odonates in the Connecticut River	Initiate Study in 2015
3.3.11 -- Fish Assemblage Assessment	Initiate Study in 2015
3.3.12 -- Evaluate Frequency and Impact	No Change

Study	Summary of Stakeholder Recommendations
of Emergency Water Control Gate Discharge Events and Bypass Flume Events on Shortnose Sturgeon Spawning and Rearing Habitat in the Tailrace and Downstream from Cabot Station	
3.3.13 -- Impacts of the Turners Falls Project and Northfield Mountain Project on Littoral Zone Fish Habitat and Spawning Habitat	Conduct Field Work Components in 2015
3.3.14 -- Aquatic Habitat Mapping of Turners Falls Impoundment	No Change
3.3.15 -- Assessment of Adult Sea Lamprey Spawning within the Turners Falls Project and Northfield Mountain Project Areas	Initiate Study in 2015
3.3.16 -- Habitat Assessment, Surveys and Modeling of Suitable Habitat for State-listed Mussel Species in the CT River below Cabot Station	Aspects of this study are currently disputed pending the Study Plan Determination. Appropriate implementation and timing considerations will be addressed in the Study Plan Determination
3.3.17 -- Assess the Impacts of Project Operations of the Turners Falls Project and Northfield Mountain Project on Tributary and Backwater Area Access and Habitat	No Change
3.3.18 -- Impacts of the Turners Falls Canal Drawdown on Fish Migration and Aquatic Organisms	No Change
3.3.19 -- Evaluate the Use of an Ultrasound Array to Facilitate Upstream Movement to Turners Falls Dam by Avoiding Cabot Station Tailrace	Conduct Study in 2016
4.2.3 -- Hydraulic Study of Turners Falls Power Canal	This is a requested study, not proposed by FirstLight. If study is approved in study plan determination, requester suggests implementation in 2015.