



May 2, 2014

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

Re: FirstLight Hydro Generating Company, FERC Project Nos. 2485-063 and 1889-081
U.S. Fish and Wildlife Service Conceptual Framework for Ichthyoplankton Entrainment
Assessment

Dear Secretary Bose:

On May 2, 2014, the U.S. Fish and Wildlife Service (USFWS) filed a conceptual framework for assessing ichthyoplankton entrainment at the Northfield Mountain Pumped Storage Project (proposed study) for the Federal Energy Regulatory Commission's (Commission) consideration in its review of the study dispute filed by USFWS on March 13, 2014. USFWS disputed the Commission's decision not to require FirstLight Hydro Generating Company (FirstLight), licensee of the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project (Northfield Mountain), to quantify the level of entrainment of early life stages of American shad during the first year of studies for relicensing the projects. USFWS states in a supplement to its proposed study that if the Commission accepts the proposed study, USFWS would consider its dispute resolved.

As USFWS indicated in its filing, following the study panel technical conference, FirstLight participated in a series of teleconferences with both USFWS and Commission staff with the goal of developing a mutually agreeable study plan. Although FirstLight supported the Commission's decision not to require FirstLight to study entrainment of shad eggs and larvae at Northfield Mountain because a 1992 study examined this issue, FirstLight believes that the level of entrainment in the 1992 study may be inaccurate, and USFWS's proposed study may provide more reliable estimates of shad egg and larval entrainment than the 1992 study. While the 1992 study assumed that the density of shad eggs and larvae collected at nine river stations was the same as the density of those entrained at Northfield Mountain, the zone of influence of the Northfield Mountain intake was not determined. USFWS's proposed study would eliminate this assumption because it would involve sampling water that has actually been pumped through the Northfield Mountain intake.

John S. Howard
Director FERC Compliance
Chief Dam Safety Engineer

FirstLight Power Resources, Inc.
99 Millers Falls Road
Northfield, MA 01360
Tel. (413) 659-4489/ Fax (413) 422-5900/
E-mail: john.howard@gdfsuezna.com

Because the proposed study, as designed, would likely yield more realistic estimates of the level of entrainment of shad eggs and larvae at Northfield Mountain, FirstLight supports USFWS's proposed study as filed.¹ FirstLight believes that conducting the study would be useful, even if the study panel were to recommend that existing data are sufficient to quantify entrainment at Northfield Mountain.

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 Howard". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Howard".

John Howard
Director FERC Compliance

¹ By agreeing to conduct the entrainment study as set forth in USFWS's proposed study, FirstLight does not concede that USFWS's study dispute pertains to the exercise of USFWS's authority under section 18 of the Federal Power Act.