

**FEDERAL ENERGY REGULATORY COMMISSION
MEMORANDUM**

DATE: January 25, 2021

FROM: Steve Kartalia, Project Coordinator
Division of Hydropower Licensing
Office of Energy Projects

TO: Public Files for the Turners Falls and Northfield Mountain Pumped Storage projects (FERC Project Nos. 1889 and 2485)

SUBJECT: Clarification of Additional Information Request

On January 22, 2021, Mike Swiger, attorney for FirstLight Power, contacted me by phone to request a phone call between FirstLight and FERC staff for the purpose of clarifying additional information requests (AIRs) issued by FERC on January 14, 2021. Mr. Swiger indicated that the AIRs FirstLight was seeking clarification on were AIR #s 4 and 5 for Turners Falls and AIR #3 for Northfield Mountain.

I scheduled the call for 12:00pm Eastern time on January 25, 2021. Participating in the call were Nicholas Tackett and me from FERC; Fred Winchell, Ken Hodge, and Brian Mattax from WSP (FERC's NEPA support contractor); Justin Trudell, John Howard, Mike Swiger, Mark Wamser, and Tom Sullivan for FirstLight.

FirstLight began by asking for FERC to clarify that, in AIR #4 for Turners Falls and AIR #3 for Northfield Mountain, it was requesting to know the effect of each of the eight proposed operational changes on annual generation at the respective projects. FERC indicated that that was correct. FirstLight stated that their project operations are dependent on the inflow from the upstream Vernon Project operated by Great River Hydro. FirstLight explained that its analysis of the effects of its proposed project operations in their final applications filed on December 4, 2020 were based on assumed inflow data from Vernon which does not correspond to the inflows that would result from the proposed operational parameters for the Wilder, Bellows Falls and Vernon projects which Great River Hydro included in its final applications filed on December 7, 2020. Therefore, the annual generation estimates, water surface elevations, and outflow data for the FirstLight projects provided in their license application are not relevant given the expected inflow from Vernon based on Great River Hydro's proposed operations.

Based on the dependent nature of the FirstLight projects on inflows from Great River Hydro's Vernon project, FERC recommended that FirstLight characterize the effect of the proposed measures on annual generation to the best of its ability with the

information that it has and suggested that FERC staff may request additional information after receiving additional Vernon Project discharge data from Great River Hydro.

FirstLight then sought clarification from FERC that in Turners Falls AIR #5, it is seeking hourly data for the 41-year record. FirstLight confirmed that it already has the data available. FERC confirmed that that was correct and suggested that DSS format would be a preferred format in which to file the data.