



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

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May 24, 2023

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

RE: FirstLight Power
Turners Falls and Northfield Mountain Pumped Storage Projects
FERC Nos. 1889 and 2485
SUPPLEMENTAL COMMENTS ON FIRSTLIGHT SETTLEMENT AGREEMENT

Dear Secretary Bose:

The Massachusetts Division of Fisheries and Wildlife (MassWildlife) is providing supplemental comments on the Federal Energy Regulatory Commission's (FERC) April 7, 2023 notice soliciting comments on the settlement agreement filed by FirstLight on behalf of itself, MassWildlife, U.S. Fish and Wildlife Service, National Marine Fisheries Service, The Nature Conservancy, American Whitewater, Appalachian Mountain Club, Crab Apple Whitewater, Inc., New England FLOW, and Zoar Outdoor.



MassWildlife is the agency responsible for the protection and management of the inland fish and wildlife resources of the Commonwealth. MassWildlife's mission also includes conserving and protecting endangered, threatened and species of special concern pursuant to the Massachusetts Endangered Species Act (MESA; M.G.L. c. 131A, 321 CMR 10.00) and its implementing regulations (321 CMR 10.00). As such, we monitor operations at hydroelectric projects and comment on the re-licensing of existing hydroelectric facilities within the Commonwealth.

In order to assist FirstLight in meeting the Proposed Terms and Conditions outlined in the Proposed License Articles for the Turners Falls and Northfield Mountain Pumped Storage Projects, MassWildlife respectfully requests that FERC require the Licensee of the Vernon Hydroelectric Project (Vernon Project, FERC No. 1904) to provide FirstLight the following information beginning upon license issuance:

- Electronically provide by 8:00 am of each day, the next day's 24 hour anticipated Vernon Project total discharge. The next day's 24-hour anticipated Vernon Project total discharge will be updated once the day ahead power bidding market closes and Independent System Operator-New England (ISO-NE) issues the day ahead schedule. If ISO-NE updates the day ahead hourly Vernon Project total discharge, then that revised schedule should be provided to the Licensees within 2 hours of the Vernon Project Licensee receiving an update from ISO-NE.
- Electronically provide the instantaneous Vernon Project total discharge and tailwater elevation.

Thank you for this opportunity to provide supplemental comments. If you have any questions regarding this letter, please contact Caleb Slater, Chief of Hatcheries (caleb.slater@mass.gov) or Jesse Leddick, Chief of Regulatory Review (jesse.leddick@mass.gov).

Sincerely,

 <p>Todd Richards, Ph.D. Assistant Director, Fisheries</p>	 <p>Everose Schlüter, Ph.D. Assistant Director, Natural Heritage & Endangered Species Program</p>
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