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Justin Trudell
Vice President, Operations

December 4, 2020

Via Electronic Filing

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

Re: FirstLight MA Hydro LLC, Turners Falls Hydroelectric Project (FERC No. 1889).
Northfield Mountain LLC, Northfield Mountain Pump Storage Project (FERC No. 2485).
Filing of Amended Final License Application

Dear Secretary Bose:

FirstLight MA Hydro LLC, owner of the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889), and Northfield Mountain LLC, owner of the Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485) are filing with the Federal Energy Regulatory Commission (FERC) Amended Final License Applications (AFLA) for the two Projects. FirstLight MA Hydro LLC and Northfield Mountain LLC are collectively referred to as FirstLight and the two facilities are collectively referred to as the Project. The Turners Falls Project is located on the Connecticut River and consists of two hydroelectric facilities, Cabot Station and Station No. 1. The Northfield Mountain Project uses water impounded by the Turners Falls Dam for its pumped-storage operations. Both Projects are located in Franklin County in the Commonwealth of Massachusetts. The current licenses for both Projects expired on April 30, 2018. FirstLight is currently operating on annual licenses.

The submission of the AFLA is an important milestone in relicensing these two facilities. It culminates a multi-year process in which FirstLight conducted an extensive public scoping process and completed 40+ scientific studies and numerous supplemental information filings. The completion of these scientific studies advanced FirstLight's and stakeholders' knowledge of the environmental, recreational and cultural resources at the Projects. The findings of these studies assisted FirstLight in developing a comprehensive licensing proposal. FirstLight proposes important environmental and recreational improvements to the Projects while also allowing the Projects to continue to serve their essential roles in the regional power grid and to support their host communities.

Documents

FirstLight is filing separate AFLA's for the Turners Falls Project and Northfield Mountain Project with the exception of a single Executive Summary and Exhibit E- Environmental Report. Because of the integrated nature of the two Projects, a combined Exhibit E is being filed. The AFLA filing consists of the following Volumes and documents:

Section	Turners Falls Project	Northfield Mountain Project
Executive Summary (one for both Projects)		X
Volume I of V- Public (one for each Project)		
Initial Statement and Additional Information Required	X	X
Exhibit A- Project Description	X	X
Exhibit B- Project Operation and Resource Utilization	X	X
Exhibit C- Construction History and Proposed Construction Schedule	X	X
Exhibit D- Statement of Cost and Financing	X	X
Exhibit G- Project Maps	X	X
Exhibit H- Plans and Ability of Applicant to Operate the Project	X	X
Volume II of V- Public (one for both Projects)		
Exhibit E- Environmental Report (Part 1 of 4)		X
Exhibit E- Environmental Report (Part 2 of 4)		X
Exhibit E- Appendices (Part 3 of 4) Section 1.0 Introduction to 3.3.4 Terrestrial Resources		X
Exhibit E- Appendices (Part 4 of 4) Section 3.3.5 Rare, Threatened and Endangered Species to End, includes Draft Biological Assessments for the Shortnose Sturgeon and Puritan Tiger Beetle		X
Volume III of V- Non-Public (one for both Projects)		
Exhibit E- Environmental Report- Threatened and Endangered Species		X
Volume IV of V- Non-Public (one for each Project)		
Historic Properties Management Plan	X	X
Volume V of V- Critical Energy Infrastructure Information (one for each Project)		
Exhibit F- List of General Design Drawings	X	X
Exhibit H- Plans and Ability of Applicant to Operate the Project (Single Line Electrical Diagrams)	X	X

FirstLight is filing Draft Biological Assessments (DBA) of the federally endangered Shortnose Sturgeon (SNS) and Puritan Tiger Beetle (PTB). DBA's for SNS and PTB were sent to the National Marine Fisheries Service (NMFS) and United States Fish and Wildlife Service (USFWS) on April 17, 2020, respectively. FirstLight received comments from NMFS on June 24, 2020, which have been addressed in the SNS DBA. FirstLight received comments from USFWS on August 27, 2020, which have also been addressed in the PTB DBA.

As part of the National Historic Preservation Act Section 106 consultation process and in accordance with 18 C.F.R. § 5.18(b)(3)(v), FirstLight is filing with FERC Historic Property Management Plans (HPMPs) for each Project. The HPMPs contain sensitive information regarding the specific location of cultural resources and historic properties which is not to be disclosed to the public under 18 § C.F.R. 5.6(d)(3)(x)(C) and 36 § C.F.R. 800.11(c). Accordingly, pursuant to 18 C.F.R. § 388.112(b), FirstLight requests that the HPMPs be afforded privileged treatment and placed within FERC's non-public file. The HPMPs are being

provided to the State Historic Preservation Offices for Vermont, New Hampshire, and Massachusetts, representatives of area Native American Tribes, local historical commissions, and FERC.

Section 3.3.5 of Exhibit E contains sensitive information relative to the location of several threatened and endangered species. Because of this, FirstLight requests that the Section 3.3.5 of Exhibit E also be considered privileged and be placed within FERC's non-public file. Section 3.3.5 of Exhibit E will be provided to the state and federal resource agencies.

Some information in the AFLA is Critical Energy Infrastructure Information (CEII), which has been removed from the public version of the AFLA. In accordance with the Commission's filing guidelines, all CEII material is included in Volume V of each AFLA and has been clearly marked as CEII, as it contains detailed Project facility diagrams and other information relating to the "production, generation, transportation, transmission, or distribution of energy." 18 C.F.R. § 388.113(c).

Availability of AFLA's

Due to COVID-19, FirstLight will not have a paper copy of the AFLA available at the Project; however, a paper copy will be sent to the Carnegie Public Library at 201 Avenue A, Turners Falls, MA 01376. However, concurrent with this filing, FirstLight is making public portions of the AFLA available to resource agencies, Indian tribes, local governments, non-governmental organizations, and members of the public. Electronic copies of the applications will be available on the Project's public relicensing website at www.northfieldrelicensing.com, or via FERC's online e-Library at <https://elibrary.ferc.gov/IDMWS/search/fercgensearch.asp>, by searching FERC Project No. P-1889 and FERC Project No. P-2485. In accordance with 18 C.F.R. § 5.17(d)(2), FirstLight will publish public notice of the filing of the AFLA twice in the following newspapers:

- The *Greenfield Recorder*, a daily newspaper in circulation in Franklin County, Massachusetts.
- The *Keene Sentinel*, a daily newspaper in circulation in Cheshire County, New Hampshire.
- The *Brattleboro Reformer*, a daily newspaper in circulation in Windham County, Vermont.
- The *Montague Reporter*, a weekly newspaper in circulation in Franklin County, Massachusetts.

If you have any questions regarding this filing, please contact me at 781-653-4247 or justin.trudell@firstlightpower.com.

Sincerely,



Justin Trudell
Vice President, Operations

cc: Distribution List

Distribution List

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