

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

TransCanada Hydro Northeast Inc.)	Wilder Project No. 1892-026
)	Bellows Falls Project No. 1855-045
)	Vernon Project No. 1904-073
FirstLight Hydro Generating Company)	Turners Falls Project No. 1889-081
)	Northfield Mountain Pumped
)	Storage Project No. 2485-063

**COMMENTS OF FIRSTLIGHT HYDRO GENERATING COMPANY ON
SCOPING DOCUMENT 1**

Pursuant to the Federal Energy Regulatory Commission’s (Commission) notice issued on December 21, 2012 requesting comments on the Commission’s Scoping Document 1 (SD1) for the Wilder, Bellows Falls, Vernon, and Turners Falls hydroelectric projects and the Northfield Mountain Pumped Storage Project (Northfield Mountain), FirstLight Hydro Generating Company (FirstLight), licensee of the Turners Falls and Northfield Mountain projects, submits the following comments.

I. Geographic Scope of Cumulative Effects Analysis

In the second paragraph of section 4.1.2 of SD1, the Commission notes the following:

As such, we tentatively identified the main stem of the Connecticut River from the Wilder Project downstream as having resources that may be cumulatively affected by the Connecticut River Projects. However, we are seeking input on the appropriate extent of downstream geographic scope of analysis for aquatic and water resources.¹

As FERC has explained in SD1, the “geographic scope of analysis for cumulatively affected resources is defined by the physical limits or boundaries of: (1) the proposed

¹ Scoping Document 1 for the Wilder, Bellows Falls, Vernon, Turners Falls, and Northfield Mountain Project § 4.1.2, Project Nos. 1892-026 et al. (issued Dec. 21, 2012).

action’s effect on the resources, and (2) contributing effects from other hydropower and non-hydropower activities within the Connecticut River Basin.”²

In this case, FERC must look upstream of the Wilder Project to understand the scope and magnitude of contributing effects from other hydropower activities.

Specifically, above the Vernon, Bellows Falls, and Wilder Projects is TransCanada Hydro Northeast Inc.’s (TransCanada) Fifteen Mile Falls Project (Project No. 2077), which received a 40-year new license in April 2002. The Fifteen Mile Falls Project consists of three developments. In upstream to downstream order, they are the Moore, Comerford, and McIndoes developments. The Moore and Comerford developments operate as seasonal storage reservoirs and as peaking hydropower projects. The McIndoes development operates as a peaking hydropower project. FirstLight currently pays headwater benefits to TransCanada for the seasonal operation of the Moore and Comerford reservoirs. Statistics on the Fifteen Mile Falls facilities are listed below.

Project	*River Mile	*Drainage Area at Dam	*Hydraulic Capacity of Station	*Available Storage Capacity	Operation
Moore Reservoir	283	1,600 mi ²	18,300 cfs at max load	114,176 acre-feet available in 40 foot drawdown or 57,564 cfs-days	Seasonally Operated, Peaking
Comerford Reservoir	275	1,635 mi ²	13,300 cfs at max load	32,270 acre-feet available in 40 foot drawdown or 16,135 cfs-days	Seasonally Operated, Peaking
McIndoes Reservoir	268	2,210 mi ²	5,800 cfs at max load	4,080 acre-feet available in 10 foot drawdown	Peaking

*Data obtained from FERC license orders.

² *Id.*

The storage capacity at Moore Reservoir at full capacity is sizeable relative to the hydraulic capacity at the Turners Falls Project. Assuming no inflow and a full storage volume at Moore Reservoir, the Turners Falls project could operate at full capacity (15,938 cfs) for almost four consecutive days using solely the storage capacity at Moore Reservoir. In short, the seasonal operation and distribution of discharge from this development can greatly influence the flow availability at the FirstLight hydropower facilities.

Because the frequency, timing, and magnitude of flow entering the Turners Falls impoundment are influenced both by the peaking operation and seasonal operation of the Fifteen Mile Falls Project, the geographic scope of the cumulative effects analysis should extend upstream to include the Fifteen Mile Falls Project. Accounting for the influence of the upstream reservoirs will help the Commission consider which environmental impacts – and, accordingly, mitigation for environmental impacts – are beyond the control of the Turners Falls and Northfield Mountain projects as well as the three immediately upstream TransCanada projects.

II. Reservoir Fluctuation

In section 3.4.2.4 of SD1, under the section entitled “*Licensees’ Proposed Environmental Measures*” for the Turners Falls Project, the Commission states the following:

Voluntary Measures

- Limit the typical reservoir drawdown to 3.7 feet versus the allowed 9 feet.

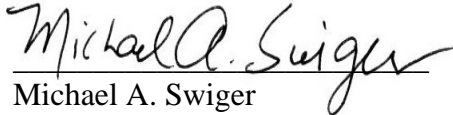
To clarify, FirstLight is *not* proposing to limit reservoir drawdown to 3.7 feet.

The current license limits the Turners Falls impoundment elevation to a minimum of 176

feet and a maximum of 185 feet msl.³ FirstLight operates the reservoir impoundment elevation within this 9-foot range, depending on the magnitude of river flow and electrical demands.⁴ However under most common operating scenarios, FirstLight maintains an impoundment elevation above 179.0 feet msl in order to create sufficient head to drive water through the gatehouse and into the power canal.⁵

Any limits on reservoir fluctuation proposed by FirstLight would be contained in its license application. However, FirstLight's current plan is to continue these operating practices.

Respectfully submitted,



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³ *W. Mass. Elec. Co.*, 11 FERC ¶ 61,124, at p. 61,265 (1980).

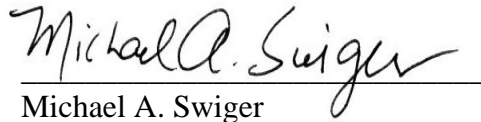
⁴ See Pre-Application Document for Relicensing of the Turners Falls and Northfield Mountain Projects at 3-24, Project Nos. 1889 and 2485 (filed Oct. 31, 2012) (PAD).

⁵ See *id.* at 3-26. To the extent the PAD suggests that FirstLight targets an impoundment elevation of 181.3 feet msl, or 3.7 feet below the maximum, that is incorrect. 181.3 feet msl elevation is the median Turners Falls impoundment elevation based on 10 years of elevation data between 2000 and 2009 as measured at the dam.

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 22nd day of February, 2013.

A handwritten signature in black ink that reads "Michael A. Swiger". The signature is written in a cursive style and is positioned above a horizontal line.

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