



September 15, 2014

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, FERC Project Nos. 2485 and 1889
2014 Initial Study Report

Dear Secretary Bose:

Pursuant to the regulations of the Federal Energy Regulatory Commission (FERC), Title 18 Code of Federal Regulations (18 C.F.R.) §5.15(c)(1), FirstLight Hydro Generating Company (FirstLight) encloses for filing the Initial Study Report (ISR) for the relicensing of its Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485).

FirstLight is applying for license renewal using the FERC's Integrated Licensing Process (ILP). As part of the ILP, FirstLight has previously filed its Pre-Application Document (PAD) and Notice of Intent (NOI) (October 30, 2012), Proposed Study Plan (PSP) (April 15, 2013), *Updated* Proposed Study Plan (June 28, 2013), Revised Study Plan (RSP) (August 14, 2013) and Study Progress Report (July 23, 2014).

FERC Study Plan Determination

On September 13, 2013, FERC issued its first Study Plan Determination Letter (SPDL) on 20 of FirstLight's 38 proposed studies and withheld action on the remaining 18 studies until issues relative to the Vermont Yankee (VY) Nuclear facility closure were resolved¹. FERC did not act on 18 studies related primarily to fish/aquatic and water quality resources and sought stakeholder input as to whether the study schedules and/or study scopes of the 18 studies could potentially change due to the VY closure. On November 25, 2013, FERC held a stakeholder meeting to seek input on the study schedules and/or study scopes associated with the remaining 18 studies. On February 21, 2014, FERC issued its second SPDL on the remaining 18 studies, and amended the proposed schedule for 11 of those studies due to the VY decommissioning.

On March 13, 2014, the United States Fish and Wildlife Service (USFWS) filed for study dispute

¹ On August 27, 2013 Entergy Corp announced that the VY facility, located at the lower end of the Vernon Impoundment, will be closing no later than December 29, 2014. VY currently withdraws water from the Vernon Impoundment (Connecticut River) for cooling purposes.

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resolution, requesting that FirstLight conduct an ichthyoplankton entrainment assessment at the Northfield Mountain Pumped Storage Project. On March 28, 2014 a study dispute meeting occurred among FERC, USFWS, FirstLight and the Study Dispute Panel. After this meeting, a series of conference calls and information exchanges occurred among FERC, USFWS and FirstLight. On May 2, 2014, USFWS filed with FERC a proposed study plan for conducting the ichthyoplankton entrainment assessment and indicated that if FERC accepted the proposed plan, USFWS would consider its study dispute resolved. On May 2, 2014, FirstLight filed a letter supporting the USFWS study plan. In light of USFWS's proposed resolution of the dispute, on May 2, 2014 FERC's Director of Energy Projects suspended the Dispute Panel's activities until further notice. In a letter dated September 3, 2014, FERC's Director of Energy Projects stated the following:

“Based on the staff analysis presented in Appendix A, the approved study plan is modified to include the FWS's revised study on ichthyoplankton entrainment at the Northfield Project. Because the FWS's revised study request provides only a conceptual framework for the study, FirstLight must develop a more detailed plan for the study in consultation with the FWS, Massachusetts Department of Fish and Game, New Hampshire Department of Fish and Game, and the Vermont Agency of Natural Resources. The study plan must be filed for Commission approval when FirstLight files its initial study report meeting summary on October 15, 2014. The study plan must document FirstLight's consultation efforts, consider comments received from the agencies, and if recommendations are not adopted, provide FirstLight's reasons based on project-specific information”.

Given this, on September 5, 2014, FirstLight emailed a draft of Study No. 3.3.20 *Entrainment of American Shad Ichthyoplankton at the Northfield Mountain Pumped Storage Project* to the agencies and stakeholders and requested comments be submitted by September 26, 2014.

Most of the 2014 studies are underway with field data collection and/or analysis on-going (many field studies are slated for 2015 and a few slated for 2016). With the exception of Study No. 3.1.1 *2013 Full River Reconnaissance* and Study No. 3.6.2 *Recreation Facilities Inventory and Assessment*, which are completed reports, the remaining ISRs are summaries that address the following:

- a study summary and consultation record
- study progress summary by task
- variances (if any) from the study plan and schedule, and
- remaining activities.

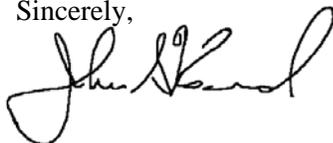
In addition to the above, in FERC's SPDL, some studies required the filing of an updated study plan, which are included in the ISR.

As required under the Commission's regulations, 18 C.F.R. § 5.15(c)(2), FirstLight will hold the study report meetings on September 30 and October 1, 2014 at the Northfield Mountain Visitors Center at 99 Millers Falls Road, Northfield MA. Agendas for these meeting (meetings will start at 9:00 am) were filed with FERC on August 21, 2014 and are also available on the relicensing website for the Projects (see link below).

FirstLight is filing the ISR with the Commission electronically. To access the ISR on the FERC website (<http://www.ferc.gov>), go to the “eLibrary” link, and enter the docket number, P-1889 or P-2485, to access the document. FirstLight is also making the ISR available for download at the following website: <http://www.northfieldrelicensing.com>.

If you have any questions, or need additional information, please feel free to contact me.

Sincerely,



John Howard