

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

Northfield Mountain LLC)	Project No. 2485-071
FirstLight MA Hydro LLC)	Project No. 1889-085

MOTION TO INTERVENE OF GREAT RIVER HYDRO, LLC

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, and the Commission’s Notices of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions (“Notices”) issued February 22, 2024, Great River Hydro, LLC (“Great River Hydro”) hereby moves to intervene in the above-captioned proceedings, which concern the review of final license applications for new major licenses for the Northfield Mountain Pumped Storage Project (“Northfield Mountain Project”) and Turners Falls Hydroelectric Project (“Turners Falls Project”) submitted by Northfield Mountain LLC (“Northfield”) and FirstLight MA Hydro LLC (collectively “FirstLight”), respectively, on April 29, 2016, as amended on December 4, 2020. In its Notices, the Commission set a deadline of April 22, 2024, for filing motions to intervene and protests.

I. DESCRIPTION OF MOVANT AND COMMUNICATIONS

Great River Hydro owns and operates thirteen generating stations on the Connecticut and Deerfield Rivers in Vermont, New Hampshire, and Massachusetts. Collectively, Great River Hydro’s hydroelectric resources generate approximately 1.6 terawatt hours of renewable energy annually, supplying approximately fifty percent of the storage capacity from conventional hydroelectric resources with storage capability in New England. Great River Hydro is the

licensee of the Vernon Hydroelectric Project (Project No. 1904), the Bellows Falls Hydroelectric Project (Project No. 1855), and the Wilder Hydroelectric Project (Project No. 1892), each located upstream of the Northfield Mountain Project and Turners Falls Project on the Connecticut River in Vermont and New Hampshire.

All correspondence, communications, pleadings, and other documents related to these proceedings should be served on the following representatives of Great River Hydro:

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Great River Hydro requests that each of the individuals identified above be placed on the Commission's official service lists for these proceedings.

II. BASIS FOR INTERVENTION

Great River Hydro is licensed to operate the Vernon, Bellows Falls, and Wilder Projects, located immediately upstream of the Northfield Mountain Project and Turners Falls Project, and is currently seeking its own new licenses from the Commission to continue operations of its projects. The Turners Falls Impoundment ("TFI") created by Turners Falls Dam, which also serves as the lower reservoir for the Northfield Mountain Project, extends upstream to the base of Vernon dam, and FirstLight uses the outflows from the Vernon Project to operate its Turners Falls Project. The Northfield Mountain Project uses the TFI as its lower reservoir, and its pump-generation cycle can affect the tailwater elevation below Vernon station. Pursuant to Article 304 of the Vernon license, Great River Hydro and FirstLight are parties to a Hydro Coordination Agreement to ensure FirstLight receives timely Vernon total discharge information to manage its projects safely and in compliance with their licenses. The Commission has indicated its intent to prepare a single environmental impact statement for the relicensing of the three Great River Hydro projects and the two FirstLight projects.

Because of the close proximity and operational association between Great River Hydro's Vernon Project and FirstLight's Northfield Mountain Project and Turners Falls Project, Great River Hydro has a direct and compelling interest in the relicensing of the Northfield Mountain Project and Turners Falls Project. Great River Hydro will be directly affected by a Commission decision in these proceedings and cannot be adequately represented by any other party.

III. CONCLUSION

For the foregoing reasons, Great River Hydro respectfully moves to intervene and requests that it be accorded all rights as a full party to the above-captioned proceedings. Great River Hydro reserves the right to file comments later in these proceedings.

Respectfully submitted,

A handwritten signature in black ink that reads "David Zayas". The signature is written in a cursive style with a long horizontal stroke at the end.

David Zayas
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Dated: April 10, 2024

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 lists compiled by the Secretary in these proceedings.

Dated at Westborough, MA, this 10th day of April 2024.



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