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John S. Howard
Director- FERC Hydro Compliance

June 19, 2013

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

Re: Northfield Mountain Pumped Storage Project, FERC Project No. 2485
Turners Falls Hydroelectric Project, FERC Project No. 1889

FirstLight Response to US Fish and Wildlife Service Extension of Time Request

Dear Secretary Bose:

The Integrated Licensing Process (ILP) schedule for relicensing of the referenced projects calls for participants to file comments on the Proposed Study Plan (PSP) being developed by FirstLight Power Resources (FirstLight) by July 14, 2013¹. In addition, FirstLight is developing in consultation with the U.S. Fish and Wildlife Service (FWS) and other stakeholders a detailed Instream Flow Study Plan (IFSP) which contemplates initial fieldwork occurring in early July 2013.

On June 13, 2013, FWS requested an extension until July 30, 2013, to provide comments on the PSP in FirstLight's proceedings and in the relicense proceedings of TransCanada for Project Nos. 1855, 1892, and 1904. FWS believes the proposed extension will benefit the ILP by helping to ensure thoughtful and well-structured comments, particularly in light of significant changes FirstLight is making to the initial PSP (to be circulated on June 21, 2013), modifications TransCanada is making to its PSP, and the desire of FWS and other stakeholders to participate in the IFSP fieldwork. FWS believes the requested extension will not interfere with the overall study plan schedule or the execution of proposed studies. Letters supporting FWS' request were filed by the Massachusetts Department of Fish and Wildlife, Connecticut River Watershed Council, New Hampshire Departments of Environmental Services and Fish and Game, National Marine Fisheries Service, Trout Unlimited, and The Nature Conservancy.

¹ Because July 14, 2013, falls on a Sunday, per the FERC regulations, the due date is actually the next business day, July 15, 2013.

As a general matter, FirstLight does not oppose FWS' extension request, based on its understanding that the remaining steps in the Study Plan Determination portion of the ILP would also be extended for two weeks, as shown on the table below (not modifying dates that fall on weekends or holidays).

Action	Time Frame	Current Date	Proposed Date
File Comments on Proposed Study Plan	Within 90 days of filing	07/14/2013	07/30/2013
File Revised Study Plan (RSP)	Within 30 days of PSP	08/13/2103	08/29/2013
File Comments on Revised Study Plan	Within 15 days of RSP	08/28/2013	09/13/2013
FERC Issues Study Plan Determination (SPD)	Within 30 days of RSP	09/12/2013	09/29/2013
Notice of Formal Study Dispute	Within 20 days of SPD	10/02/2013	10/19/2013
Study Dispute Determination	Within 70 days of Study Dispute	12/11/2013	12/28/2013

FirstLight does, however, have concerns that extending the Study Plan Determination date to late September could prejudice the timely execution of a study proposed to occur in the fall of 2013. Specifically, Study No. 3.3.16 entitled *Habitat Assessment, Surveys, and Modeling of Suitable Habitat for State-Listed Mussel Species in the Connecticut River below Cabot* is slated to occur immediately after issuance of the original study plan determination letter (9/12/2013). FirstLight is seeking to conduct this study in 2013 such that its findings can be used in the instream flow study conducted for the Connecticut River reach below the Deerfield River confluence in 2014. Therefore, FirstLight requests that the current schedule for the mussel study remain unchanged, and that the Commission issue a Study Plan Determination for Study 3.3.16 on September 12, 2013, and the Study Plan Determination for the remaining studies on September 29, 2013.

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

Sincerely,



John S. Howard
Director - FERC Hydro Compliance

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