

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426
June 28, 2013

OFFICE OF ENERGY PROJECTS

TransCanada Hydro Northeast Inc.	Project No. 1892 -026 New Hampshire - Vermont Project No. 1855-045 New Hampshire - Vermont Project No. 1904 -073 New Hampshire- Vermont
FirstLight Power Resources	Project No. 2485- 063 Massachusetts Project No. 1889- 081 Massachusetts

To the Parties Addressed:

Reference: Extension of Time Request

In a letter filed June 13, 2013, the U.S. Fish and Wildlife Service (FWS) requested a 15-day extension-of-time (EOT), to July 30, 2013, to file comments on FirstLight Power Resources' (FirstLight) proposed study plans for the Turners Falls (P-1899), and Northfield Mountain Pumped Storage (P-2485) projects, and on TransCanada Hydro Northeast Inc.'s (TransCanada) Vernon (P-1904), Bellows Falls (P-1855), and Wilder (P-1892) projects.

TransCanada and FirstLight (licensees) filed their proposed study plans on April 15, 2013, and held initial study plan meetings on May 13 and May 14, 2013, respectively. The licensees also held additional study plan meetings to provide additional detail on methodology, and to seek resolution of outstanding study plan issues. As a result of these efforts, the licensees plan to file more detailed proposed study plans with the Commission prior to the July 15, 2013 deadline for stakeholder comments.¹

FWS requests the EOT based on four points: (1) given that the updated proposed study plans are still pending, granting of the EOT will allow for thoughtful, well-structured comments and recommendations on the updated proposed study plans; (2) as a result of the extensive stakeholder meetings and comments, it is anticipated that the

¹ FirstLight intends to file its updated proposed study plan during the week of June 24, 2013, and TransCanada intends to file its updated proposed study plan the week of July 7, 2013.

licensees' updated proposed study plans will have substantial changes from the initial study plans; (3) during the week of July 7, 2013, FirstLight has scheduled three full days of field reconnaissance to support the continued development of the proposed Instream Flow Study between Turners Falls dam and the Deerfield River confluence;² and (4) the requested EOT would not delay implementation of the licensees' proposed studies.

Between June 17, 2013 and June 19, 2013, the Massachusetts Division of Fisheries & Wildlife, Connecticut River Watershed Council, The Nature Conservancy, National Marine Fisheries Service, Trout Unlimited, the New Hampshire Department of Environmental Service, The Vermont Agency of Natural Resources, and the Franklin Regional Council of Governments each supported the FWS' EOT request and requested that the Commission approve the request.

On June 19, 2013, FirstLight filed a letter with the Commission in response to the FWS' request. In its response, FirstLight states that it does not oppose FWS' request for an EOT provided that approval of the EOT would result in a shift in each of the ILP deadlines through the study dispute determination. FirstLight did, however, raise a concern that approval of the EOT request could delay implementation of Study No. 3.3.16 *Habitat Assessment, Surveys, and Modeling of Suitable Habitat for State-Listed Mussel Species in the Connecticut River below Cabot*, which is scheduled to occur immediately after September 13, 2013, when the Director's study plan determination is due.³ As such, FirstLight requested a stand-alone study plan determination for Study 3.3.16 on September 13, 2013, and a separate study plan determination for the remaining studies on September 30, 2013. Similar to FirstLight's response, on June 26, 2013, TransCanada filed a letter addressing the EOT request, stating that it did not object to the EOT, provided that each of the ILP deadlines through the study dispute determination are also shifted.

Although the requested EOT would not delay the implementation of most of the licensees' studies, granting the EOT request would affect the timing and implementation of FirstLight's Study No. 3.3.16. Additionally, I am reluctant to modify ILP deadlines absent an unusual circumstance which does not appear to be the case here. Therefore, the request for a 15-day EOT to file comments on the licensees' proposed study plans is denied.

² FirstLight intends to implement the Instream Flow Study during the 2013 field season prior to the Director's Study Plan Determination in September 2013.

³ FirstLight states that results of Study 3.3.16 will be used in the Instream Flow Study conducted for the Connecticut River reach downstream of the Deerfield River confluence in 2014.

Project Nos., 1889-081, 2485-063, 1904-073, 1855-045, and 1892-026

If you have any questions, please contact Kenneth Hogan at 202-502-8434, or via e-mail at Kenneth.Hogan@ferc.gov.

Sincerely,

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