

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

TransCanada Hydro Northeast Inc.                    )

Project No. 1855-048

**MOTION TO INTERVENE OF THE  
BELLOWS FALLS HISTORICAL SOCIETY**

Pursuant to Federal Regulations<sup>1</sup> and the Rules of Practice and Procedure<sup>2</sup> of the Federal Energy Regulatory Commission (“FERC” or “Commission”), the Bellows Falls Historical Society (“BFHS”) hereby moves to intervene in the license extension proceeding for TransCanada Hydro Northeast, Inc.’s (“TransCanada”) Bellows Falls Station,<sup>3</sup> FERC Project No. 1855-048, in response to the Commission’s Notice for motions to intervene dated January 30, 2015.<sup>4</sup> In support of its interest in this matter, the BFHS offers the following statements:

1. The BFHS is a non-profit organization dedicated to preserving the history of the village of Bellows Falls, Vermont. Much of the history of Bellows Falls relates to the village’s many historical mill buildings and the relationship between its industrial history and location on the Connecticut River. Also of great historical significance to the town is the Bellows Falls Canal, which was built in 1802, and which runs directly through the village area, separating part of the town into an island between the canal and the Connecticut River.

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<sup>1</sup> 18 C.F.R. §§ 385.212, 385.214 (2014).

<sup>2</sup> *Id.* §§ 385.2001 *et al.*

<sup>3</sup> Request for Extension of License Term for the Bellows Falls Project, Wilder Project, and Vernon Project, Project Nos. 1855-048, *et al.* (Jan.16, 2015).

<sup>4</sup> Notice of Application Accepted for Filing, Soliciting Comments, Motions to Intervene, and Protests, Project Nos. 1855-048, *et al.* (Jan. 30, 2015) (establishing March 2, 2015 deadline for motions to intervene and other responses to application).

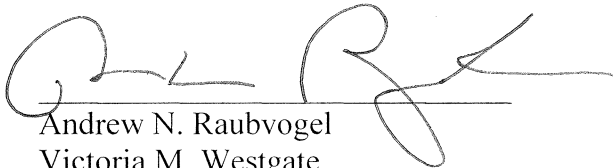
2. As part of its historical stewardship for the Bellows Falls area, the BFHS owns and maintains the Adams Old Stone Grist Mill (“Grist Mill”) building on Mill Street and operates a museum within the building during the summer months. The museum features 19<sup>th</sup> century milling tools and equipment, including much of the original Grist Mill infrastructure such as grain elevators.
3. In conjunction with several other entities, including Vermont regional planning commissions, the U.S. Environmental Protection Agency (“EPA”) and the Vermont Agency of Natural Resources, the BFHS has constructed the “Bellows Falls Historic Riverfront Park and Trail System” (“Riverfront Park”). The Riverfront Park area is an approximately eight-acre parcel adjacent to the Grist Mill building and directly fronting the Connecticut River. Once completed, the Riverfront Park will contain bike and nature paths and a boat launch, and offer picnic and recreational areas for visitors and residents of the village. The area will also function as a nature and bird sanctuary. Substantial resources have been put into the Riverfront Park at this point, including a \$200,000 grant from the EPA.
4. The Grist Mill and the land for the Riverfront Park were transferred to the BFHS by TransCanada’s predecessor USGen New England, Inc. (“USGenNE”). USGenNE retained a right-of-way to the land, which TransCanada holds today, as well as construction, flowage, and other rights.
5. Mill Street, where both the Grist Mill building/museum and the Riverfront Park are located, runs perpendicular to the Bellows Falls canal, and both are located between the street and the Canal.
6. TransCanada’s Bellows Falls facility, which is the subject of this license extension proceeding, includes the Bellows Falls canal. The distance between the Grist Mill

building and TransCanada's infrastructure is only several hundred feet, and the Riverfront Park is located on the Connecticut riverfront parcel directly south of the TransCanada facility. Both the Grist Mill and the Riverfront Park properties directly adjoin the Project.

7. The BFHS—as the developer of the Riverfront Park and the entity responsible for maintaining the Grist Mill building and museum—has material and substantial interests in the adjacent lands and waterfront that may be affected by the outcome of this proceeding on behalf of itself and residents and visitors to the Bellows Falls area. The BFHS does not oppose the extension of the Commission's licensing of the Bellows Falls Project, but has a substantial interest in ensuring that the historical and recreational welfare of the area are represented and protected. The BFHS's interests in this matter are unique and could not be adequately represented by another party. For these reasons, the BFHS respectfully requests that it be granted party status by the Commission in this proceeding. All communications, correspondence, and documents related to this filing should be directed to the address listed below.

SIGNED at Burlington, Vermont, this 27<sup>th</sup> day of February, 2015.

By:



Andrew N. Raubvogel

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**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 Burlington, VT, this 27<sup>th</sup> day of February, 2015.



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