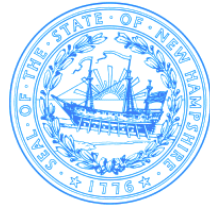




The State of New Hampshire
Department of Environmental Services

Thomas S. Burack, Commissioner



March 2, 2015

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

Re: Comments on Request for Extension of License Term Wilder (P-1892), Bellows Falls (P-1855), and Vernon (P-1904) Hydroelectric Projects.

Dear Secretary Bose,

The New Hampshire Department of Environmental Services (Department) is the agency responsible for the protection of surface water quality in New Hampshire and with administering the water quality certification program pursuant to New Hampshire law, RSA 485-A:12,III and section 401 of the Clean Water Act (Federal Water Pollution Control Act), 33.U.S.C. 1341.

The Department has reviewed the letter dated January 16, 2015 by TransCanada Hydro Northeast Inc. (TransCanada) regarding a request to extend the current license term for the Wilder (P-1892), Bellows Falls (P-1855), and Vernon (P-1904) Hydroelectric Projects by one year. As stated by TransCanada, the extension would allow time to complete the aquatic studies delayed by decommissioning of Entergy's Vermont Yankee Nuclear Power Plant, incorporate this information into operations models, and to assess any potential mitigation measures to address the Projects' effects on resources prior to filing final license applications. By providing opportunity for TransCanada and stakeholder review of all study results, and results of the operations models, the extension would benefit stakeholders and allow TransCanada to avoid significant amendments to its license applications.

In principal the Department supports the one (1) year extension as requested and concurs with TransCanada's assessment that a license extension would benefit the relicensing of these three hydroelectric projects. However, because of their interaction, and to facilitate a coordinated review and preparation of a multi-project environmental impact statement for all five projects on the Connecticut River, the Department recommends that the three TransCanada projects and the two First Light projects be kept on the same relicensing schedule, as originally intended.

DES appreciates the opportunity to comment. Should you have any questions, please do not hesitate to contact me at (603-271-0699) or Gregg Comstock at (603-271-8983).

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Sincerely,

A handwritten signature in black ink, appearing to read "O. David". The signature is fluid and cursive, with the first letter "O" being large and prominent.

Owen David, Coordinator
Water Quality Certification Program
Watershed Management Bureau
New Hampshire Department of Environmental Services
owen.david@des.nh.gov

Cc.

Brandon Cherry, FERC
John Warner, U.S. Fish and Wildlife Service
Melissa Grader, U.S. Fish and Wildlife Service
Carol Henderson, NH Fish and Game
Jeff Crocker, Vermont Department of Environmental Conservation
Eric Davis, Vermont Department of Environmental Conservation
Gabe Gries, New Hampshire Fish & Game Department
Ted Diers, NH DES