



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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In Reply Refer To: FERC Nos. 1904-073, 1855-045, and 1892-026 February 26, 2015
TransCanada Hydro Northeast Inc.
Connecticut River
COMMENTS ON REQUEST FOR EXTENSION OF LICENSE TERM

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Dear Secretary Bose:

This responds to the Federal Energy Regulatory Commission's (FERC) January 30, 2015 Notice of Application Accepted for Filing, soliciting comments on TransCanada Hydro Northeast Inc.'s (TransCanada) request for a one-year extension of the licenses for its Vernon, Bellows Falls, and Wilder hydroelectric projects, located on the Connecticut River in New Hampshire and Vermont.

The licenses for the three hydropower projects are due to expire on April 30, 2018. According to FERC's Integrated Licensing Process (ILP) schedule, TransCanada must file a Preliminary Licensing Proposal (PLP) or a draft License (dL) by December 4, 2015.

Due to the closing of the Vermont Yankee Nuclear Power Station (VY), the U.S. Fish and Wildlife Service (Service) and other stakeholders had requested, and FERC granted, an extension of time for TransCanada to conduct a number of its required Aquatic Studies due to the substantial change in River temperatures that would occur after the VY shutdown. The majority of those studies will be undertaken during the 2015 field season rather than as previously planned in 2014, with some not being completed until November 2015. After the field work is done, the data still need to be analyzed, reports developed and distributed to stakeholders for review and comment, and final reports submitted to FERC. However, it is not possible for those activities to occur in addition to dissemination of the reports and comments and development of a meaningful PLP or dL prior to the current December 4, 2015 deadline.

Failure to grant the license extension request would put TransCanada in the position of filing an incomplete application, which would then require the Service and other parties to file comments and recommendations based on incomplete information and require that we point out the obvious omissions from the PLP or dL and the need for additional information. It would also put TransCanada in the position of having to later file an amended application based on analyses not

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completed prior to the December 4, 2015 deadline (or even the May 2, 2016 deadline to file the final license application), if it determines that modifications to project proposals are necessary.

Given the problems with the current timeline discussed above, the one-year extension of license term requested by TransCanada is reasonable. It would provide additional time for the Applicant to analyze study results, provide study reports to stakeholders, solicit feedback, and develop mitigation and enhancement measures prior to submitting a PLP or dL to FERC.

Our only concern about granting the requested extension would be the misalignment it would create between the filing schedules of TransCanada's projects and FirstLight's two projects if that then affects the simultaneous posting of the Ready for Environmental Analysis notice. FERC, in the project Scoping Documents for all five hydro projects, stated that it intends to conduct a single National Environmental Policy Act analysis for all five projects in an environmental impact statement.¹ The Service believes such a coordinated review of all projects concurrently is imperative as the operations of all five projects are interrelated and it allows for the most comprehensive assessment of cumulative effects. Therefore, the Service recommends that, if an extension is granted to TransCanada, it will not impact the coordinated review and issuance of a single environmental impact statement for all five projects, as envisioned in Scoping Document 1.

Thank you for the opportunity to comment on this notice. If you have any questions, please contact John Warner of this office at 603-223-2541.

Sincerely yours,



Eric L. Dentelle

Acting For

Thomas R. Chapman

Supervisor

New England Field Office

¹ FERC Scoping Document 1, issued in December of 2012. Issuance No. 20121221-3049

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