

Kimberly D. Bose, Secretary

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Great River Hydro

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May 15, 2018

VIA ELECTRONIC FILING

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

**Re: Great River Hydro, LLC, ILP; Progress Report
Project Nos. P-1892-026, 1855-045, and 1904-073**

Dear Secretary Bose:

Great River Hydro, LLC (“Great River Hydro”) is the owner and licensee of the Wilder Hydroelectric Project (FERC No. 1892), the Bellows Falls Hydroelectric Project (FERC No. 1855), and the Vernon Hydroelectric Project (FERC No. 1904). On October 31, 2012, TransCanada (the previous licensee) initiated the Integrated Licensing Process (“ILP”) by filing with the Federal Energy Regulatory Commission (“FERC” or “Commission”) its Notice of Intent to seek new licenses for each project, along with a separate Pre-Application Document for each project. The current licenses for these projects each expire on April 30, 2019.

In accordance with the Commissions Revised Process Plan and Schedule for the Wilder, Bellows Falls, and Vernon Hydroelectric Projects dated February 15, 2018, Great River Hydro respectfully provides this progress report on the status of activities related to Studies 9 (Instream Flow), 24 (Dwarf Wedgemussel and Co-Occurring Mussel), and 33 (Cultural and Historic Resources).

As requested during the most recent consultation meeting with stakeholder members of the Aquatics Working Group in October 2017, Great River Hydro provided stakeholders with model output and graphs of a preliminary base-case run presented at the meeting. Additionally, an operations model constraints template was developed, discussed and provided to

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stakeholders. The template allows stakeholders to propose habitat-based (including dwarf wedgemussel) flows or operating scenarios to be run through the model. Independent of habitat-based scenario proposals, stakeholders requested a model run of “inflow equals outflow” or holding water surface elevation (WSE) stable at each of the three dams. Stakeholders made it clear that the request was not based upon any habitat-data but more to “get a sense of the water availability below each dam” absent the effect of store and release mode of operation. GRH agreed to make such a run and provide the stakeholders with inflow, dam discharge and impoundment/riverine node WSE data to assess water availability and upstream and downstream impact. Prior to developing a run, GRH had to update the operations model Base Case with more current pricing profiles as they have changed substantially since the model was developed. January and February energy demand have significantly become more critical due to gas supply and distribution challenges (as was experienced in late December 2017 and January 2018). The model Base Case was updated and the “Steady WSE at the Dam” scenario was run for the five annual hydrologies. GRH has spent much of the past months cross-checking the model base case, making sure it operated correctly before applying the “Steady WSE at the Dam” constraint. The results are being provided to Study 9 Instream Flow working group stakeholders now via our secure relicensing sharepoint site. Several meetings are planned over the next two months to discuss the results and hopefully receive additional feedback and proposals on habitat-based operational alternatives. At this time, Great River Hydro does not have an estimated filing date for the Study 9 and 24 report addenda.

Great River Hydro last met formally with Indian tribes and tribal interests in late October 2016 to review the Traditional Cultural Properties report filed May 16, 2016. While some comments were provided, significant discussion focused on the consultation process and participating parties to consultation. Additional comment letters were filed through spring 2017. Great River Hydro will continue efforts to complete our TCP as well as develop a Programmatic Agreement in consultation with the State SHPO’s and tribal leaders during summer 2018.

If there are further questions regarding this matter, please contact me at 603-498-2851 or jragonese@greatriverrhydro.com. Thank you for your consideration.

Sincerely,



John L. Ragonese
FERC License Manager

cc: Interested Parties List (distribution through email notification of availability and download from Great River Hydro’s relicensing web site www.greatriverrhydro-relicensing.com).