



Great River Hydro

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February 9, 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; 2017 Supplemental Study Reports, Studies 18 and 21; Study Report Meeting  
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.

With this filing, Great River Hydro submits supplemental study reports for ILP Study 18 (American Eel Upstream Passage Assessment) and Study 21 (American Shad Telemetry Study), reporting on 2017 fieldwork and assessments. Study plans for each study were sent to stakeholders on May 9, 2017; on May 11, a consultation call was held, and summary notes of the consultation distributed to attendees.

The Study 18 supplement is the second of its kind and represents a third year of American Eel upstream passage assessment at the Vernon Project. The 2017 study was designed to repeat the 2015 and 2016 studies but to occur throughout the upstream migration season and when the Vernon fish ladder was operated on a normal seasonal schedule (mid-April to mid-July). During the 2015 study, the fish ladder was operated continuously through the American Eel migratory season for Study 17 (Upstream Passage of Riverine Fish Species Assessment), and the 2016 supplement effort was unable to capture the entire upstream migration season.

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The Study 21 supplement was conducted in response to comments on the 2015 study. Natural resource agencies were concerned that the number of adult shad for which a downstream passage route could be determined was too low to draw reasonable conclusions. The supplemental study focused solely on assessment of downstream passage route selection at Vernon dam and did not address project effects on survival or spawning.

A study report meeting is scheduled for 9:30 AM on March 8 at Great River Hydro's Consolidated River Control Center Conference Room, located above Wilder Station, 255 Wilder Dam Rd, Wilder Vermont, 05088. In addition to addressing comments on Studies 18 and 21, we will present our efforts/modifications to improve fish passage and eel monitoring at the Vernon fish ladder. Study 2/3 Erosion Supplemental Data report filed with the Commission on November 15, 2017 will also be on the agenda for discussion and comment. Additionally, we will provide an update on the on-going analysis and consultation regarding Study 9 (Instream Flow) and 24 (Dwarf Wedgemussel) reports with the Aquatics working group. Remote dial-in or web-based participation information is provided below.

Great River Hydro is continuing to consult with the Aquatics working group on Study 9, through conference calls (4/14/17 and 6/28/17), meetings (7/24/17 and 10/5/17), and numerous emails. Consultation includes data exchange and discussion of IFIM model results and project operation (using operations model) impacted habitat, including dwarf wedgemussel (Study 24) and other aquatic resources and impacts. We continue to conduct these consultation efforts and meetings to facilitate stakeholder review and comment as well as examine possible operational modifications that could address issues presented in the reports.

If there are further questions regarding this matter, please contact me at 603-498-2851 or [jragonese@greatriverhydro.com](mailto:jragonese@greatriverhydro.com). Thank you for your consideration.

Sincerely,



John L. Ragonese  
FERC License Manager

Attachment: Supplemental study reports for Studies 18 and 21

cc: Interested Parties List (distribution through email notification of availability and download from Great River Hydro's relicensing web site [www.greatriverhydro-relicensing.com](http://www.greatriverhydro-relicensing.com)).

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**STUDY REPORT MEETING**

**9:30 AM; MARCH 8, 2018**

**CONFERENCE ROOM**

**Great River Hydro Consolidated River Control Center**  
Wilder Station, 255 Wilder Dam Rd, Wilder Vermont, 05088

**FOR TELECONFERENCE OR DIAL-IN PARTICIPANTS,**

<https://global.gotomeeting.com/join/902198773>

You can also dial in using your phone.

United States: +1 (312) 757-3121

Access Code: 902-198-773