



Great River Hydro

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May 20, 2019

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 Study 9 Revised Final Study Report;
Study 8, 2018 Supplemental Study Report;
Notice of Study Report Meeting;
Project Nos. P-1892-026, 1855-045, and 1904-073**

Dear Secretary Bose:

Great River Hydro, LLC (“GRH”) 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. On May 9, 2019 the Commission issued a “Notice of Authorization for Continued Project Operation” for each of the three Projects. The Notices extend the conditions of the current licenses for one year or until the issuance of new licenses, whichever comes first; and, unless otherwise ordered by the Commission, automatically renew annual licenses should new licenses not be issued by April 30, 2020.

On March 22, 2017 TransCanada (the previous licensee) filed a Final Study Report for Study 9 (Instream Flow), and, for Study 24 (Dwarf Wedgemussel and Co-occurring Mussels), results of a Delphi panel established to develop habitat suitability curves. Based on comments received during the comment period and complexity of the instream flow study it was clear to GRH that additional consultation on the study results would be beneficial. Since then, numerous consultation meetings, conference calls, and data requests and responses were conducted between GRH and the Aquatics Working Group (“AWG”). The FERC was informed on the progress of those activities through progress reports GRH filed with the Commission on May

15, 2018, August 13, 2018, November 13, 2018, and February 11, 2019.

In accordance with the Commission’s Revised Process Plan and Schedule for the Wilder, Bellows Falls, and Vernon Hydroelectric Projects dated February 19, 2019, GRH respectfully submits Revised Final Study Report for ILP study 9 (Instream Flow). No changes have been made to the report filed on March 22, 2017 for Study 24, “*Dwarf Wedgemussel and Co-occurring Mussel Study, Development of Delphi Habitat Suitability Criteria,*” and it is therefore considered final. Consideration of instream flow effects on dwarf wedgemussel and co-occurring mussel species was included in the Study 9 report along with all other target species and life stages.

Changes to the Revised Final Study Report for ILP Study 9 are detailed in table 1 below and were made to address three items: 1) recent consultation with the AWG as described in the progress reports referenced above; 2) agreement with the AWG, made after the March 22, 2017 filing, to use a modified (combined GRH and FirstLight) depth criteria habitat suitability curve (HSC) for spawning Sea Lamprey; and 3) correction of a discrepancy found during consultation with the AWG in the calculation of area of weighted suitability (AWS) for mussels in Wilder reach 3 and combined reaches. The AWS discrepancy was corrected in information provided to the AWG and for completeness, is corrected in this revision of the report.

Table 1. Directory of changes made to Study 9, Instream Flow Revised Final Study Report

Section	Revision
Report Section 5.8, p. 131	<p>Text Removed: however the combined depth HSC has not yet been evaluated and results have not been provided. Results will be updated pending agreement by stakeholders on curve modification.</p> <p>Replaced with: agreement on depth modifications did not occur until after the March 22, 2017 Study 9 report was filed. Results for Sea Lamprey spawning found in figures, tables and appendices have been updated in this report.</p>
Report Section 6.3	Updated with additional data assessment based on consultation discussions with AWG.
Figure 5.4-5 - Wilder 1 Sea Lamprey spawning	Updated
Figure 5.4-12 – Wilder 2 Sea Lamprey spawning	Updated
Figure 5.4-19 – Wilder 3 Sea Lamprey spawning	Updated
Figure 5.4-24 – Wilder All (Combined) Sea Lamprey spawning	Updated
Figure 5.4-29 – Wilder 2D vs Wilder All Sea Lamprey spawning	Updated
Figure 5.4-37 – Bellows Falls Sea Lamprey spawning	Updated
Figure 5.4-44 – Vernon Sea Lamprey spawning	Updated
Figure 5.5-21 – Bellows Falls bypass Sea Lamprey spawning	Updated
Figure 5.7-1 – Wilder 1D DWM	Updated
Figure 5.7-2 – Wilder 1D DWM	Updated
Figure 6.1.2-5 – Bellows Falls Sea Lamprey Habitat Duration	Updated
Appendix D: Area Weighted Suitability	<p>Updated</p> <p>a) Sea Lamprey spawning AWS all reaches</p> <p>b) Corrected Wilder Reach 3 and Wilder Combined DWM and Co-occurring mussels AWS values</p>

Appendix E: Wilder 2D Weighted Usable Area and Suitability Maps	Updated a) Sea Lamprey spawning WUA tables b) Sea Lamprey spawning habitat suitability maps
Appendix G: Wilder 1D Time Series Habitat Duration	Updated a) Sea Lamprey spawning Habitat Duration Graphs
Appendix I: Bellows Falls Time Series Habitat Duration	Updated a) Sea Lamprey spawning Habitat Duration Graphs
Appendix J: Vernon Time Series Habitat Duration	Updated a) Sea Lamprey spawning Habitat Duration Graphs
Appendix K: Wilder 1D Dual Flow Analysis Tables and Figures	Updated a) Sea Lamprey spawning
Appendix L: Wilder 2D Dual Flow Analysis Tables and Figures	Updated a) Sea Lamprey spawning
Appendix M: Bellows Falls Dual Flow Analysis Tables and Figures	Updated a) Sea Lamprey spawning
Appendix N: Bellows Falls Dual Flow Analysis Tables and Figures	Updated a) Sea Lamprey spawning

Also included in this filing is a supplemental study report for ILP Study 18 (American Eel Upstream Passage Assessment) reporting on 2018 fieldwork and assessments. In accordance with 18 C.F.R. § 5.15(c)(2), Great River Hydro will hold a meeting to discuss the enclosed reports, on Tuesday June 4, 2019 from 10:30am – 12:30pm in the conference room at GRH’s River Operations Center (ROC) at Wilder Dam in Wilder, Vermont. Please park in the area to the right of the access road before you reach the fence and building. Please wait for someone to open the gate as this is a NERC-secure facility. The proposed meeting agenda is attached to this letter and includes information to access a GoToMeeting session created for remote audio and video attendees.

If there are any questions regarding the information provided in this filing, please contact John Ragonese at 603-498-2851 or by emailing john_ragonese@transcanada.com.

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.greatriverhydro-relicensing.com).

Attachments:

Updated Study Results Meeting Agenda and Remote Access
Revised Final Study Report ILP Study 9 – Instream Flow
Supplemental Study Report ILP Study 18 - American Eel Upstream Passage Assessment



Agenda

Great River Hydro, LLC Study Report Meeting
JUNE 4, 2019
10:30 – 12:30

CONFERENCE ROOM

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

Introductions

Study 9 – Instream Flow, including data for Study 24 – Dwarf Wedgemussel and co-occurring mussels

Study 18 – 2018 Supplemental study report for American Eel Upstream Passage at Vernon Dam

Lunch - provided

FOR TELECONFERENCE OR DIAL-IN PARTICIPANTS,

<https://global.gotomeeting.com/join/317014853>

You can also dial in using your phone.

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