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December 7, 2020

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; FERC Project Nos. 1855, 1892, and 1904
Submission of Amended Final License Application**

Dear Secretary Bose:

Great River Hydro, LLC (Great River Hydro) as licensee, owner, and operator hereby submits three amended Final License Applications (FLA) for the relicensing of the Wilder Project (FERC No. 1892), Bellows Falls Project (FERC No. 1855), and Vernon Project (FERC Project No. 1904) (collectively known as the Projects). The current licenses for each of the Projects expired on April 30, 2019. By notice dated May 9, 2019, FERC authorized Great River Hydro to continue operation of each of the Projects until such time as the Commission acts on its application for a subsequent license. This amended FLA addresses the additional information requested in the Commission letter dated October 7, 2020, pertaining to the initial FLA filings on May 1, 2017. At that time, aspects of key studies were not yet final, making it premature for Great River Hydro to develop a complete licensing proposal detailing environmental measures for the Projects in the new license term. Therefore, Great River Hydro's proposal was limited to the no-action alternative. However, Great River Hydro indicated that it would amend the license applications after completing additional field work, consultation, and analyses on the remaining studies.

ILP Activity since May 1, 2017, filing of FLA

On March 22, 2017, Great River Hydro filed two study reports. On July 7, 2017, FERC issued a study plan determination approving in part, requested modifications to one of the filed studies (Study 2/3). On February 15, 2018, FERC issued a revised process plan and schedule for stakeholders to request modifications on five of seven remaining studies and study supplements. FERC issued a study determination for the five studies on June 21, 2018, and no study modifications were required.

FERC's February 15, 2018, process plan required Great River Hydro to submit progress reports on the status of the two remaining studies, Study 9 (*Instream Flow Study*) and Study 24 (*Dwarf Wedgemussel and Co-Occurring Mussel Study*), every 90 days until the study report addenda were complete. Great River Hydro filed progress reports on May 15, 2018, August 14, 2018, November 13, 2018, and February 11, 2019. On February 19, 2019, FERC issued a revised process plan and schedule, and on May 20, 2019, Great River Hydro filed final reports. No disagreements or requests to amend the study plans were filed; therefore, FERC did not issue a study plan determination.

On February 6, 2020, Great River Hydro filed a letter stating it anticipated filing an amended FLA by July 31, 2020. However, confidential discussions regarding future operations, initiated in March 2020, between Great River Hydro and the U.S. Fish and Wildlife Service (FWS), New Hampshire Departments of Environmental Services (NHDES) and Fish and Game (NHFG), Vermont Departments of Environmental Conservation (VDEC) and Fish and Wildlife (VFW), The Nature Conservancy (TNC) and the Connecticut River Conservancy (CRC) (collectively referred to as Discussion Stakeholders) were still progressing toward a mutually supported alternative operation proposal. Great River Hydro informed FERC relicensing staff by email that its amended FLA filing would be delayed for purposes of continuing productive consultation on instream flow and project operations. On October 7, 2020, FERC requested Great River Hydro file its amended FLA by December 6 (falling on weekend, the filing date is the next business day).

As of the last meeting held on November 4, 2020, Great River Hydro and Discussion Stakeholders conducted over 21 consultation meetings comprising over 75 hours of mutual discussions. On November 9, 2020, a Proposed Alternative Operation was finalized among all participating stakeholders. On December 1, 2020, a Memorandum of Understanding was executed between all participating Discussion Stakeholders and Great River Hydro that evidences support for the proposed alternative operation as representing an agreed-upon operation of the Projects, addressing many flow, impoundment, and operational related resource concerns that are a result of, or are perceived to be a result of, operations of the Projects. The proposed alternative operation is included in the amended FLA acceptable and supported by the Discussion Stakeholders. Similarly, Great River Hydro intends to file it as the proposed operation in its 401 Water Quality Certificate (WQC) applications and, pending any new information that would suggest otherwise, NHDES and VDEC indicate it will be included in the draft WQC issued for public comment.

Great River Hydro's Proposal

In its amended FLA, Great River Hydro offers an applicant proposal that continues operation of the three hydroelectric Projects as critical and essential renewable energy generation resources. It will continue to manage its Projects in a responsible manner, ensuring high dam safety and operating standards; operate and expand fish passage facilities as needed; manage its public recreation facilities, including access to public waters within fee-owned Project lands; and protect and expand awareness of historic and cultural resources within the Project boundaries.

Great River Hydro proposes to operate the Wilder, Bellows Falls, and Vernon Projects fundamentally different than current operation (also referred to as the no-action alternative). The proposed operation comprises the major enhancement and mitigation element and represents the most significant element associated with the Great River Hydro proposal. The proposed operation addresses many resource concerns both holistically and specifically, adopting many operational preferences stated by active stakeholders in the scoping and study phase of the ILP.

At the same time, the proposed operation maintains Great River Hydro's capability to be flexible and responsive to current wholesale energy, forward capacity, reserve, and other ancillary services markets managed by ISO-NE. The proposed operation will also remain responsive to ISO-NE system emergencies when ISO-NE requires operation for reserves, security, system stability, system over-supply conditions, and critical events or other emergencies involving dam and public safety. The proposed operation ensures the Projects' ability to address future regional energy demands and system needs as those evolve over time.

Proposed operation, under conditions when inflow to the Project at the dam is within the range of the Project powerhouse hydraulic capacity, focuses on creating more stable impoundment water surface elevations by reducing the average frequency, average duration, and average range of impoundment fluctuation. It also will reduce the magnitude and frequency of sub-daily operational changes in discharge from each Project by increasing the amount of time that the Projects are operated in an inflow equals outflow mode and maintain a stable impoundment elevation at the dams.

Great River Hydro and state and federal resource agencies with prescriptive authority under Section 18 of the Federal Power Act have initiated discussion of upstream and downstream fish passage at the Projects and will continue those discussions after the amended FLAs are filed in an effort to reach agreement on fish passage requirements, plans and schedules to be included in the agency recommendation for terms and conditions to be filed within 60 days of FERC's notice that the application is Ready for Environmental Analysis.

In addition, within 60 days of notice from FERC that the application is Ready for Environmental Analysis, Great River Hydro will be filing applications with both NH and VT for Water Quality Certification. Also, shortly after filing the application, Great River Hydro will be initiating development of a Programmatic Agreement managing historic property (PA) with the NH and VT State Historic Preservation Offices that includes the development of a Historic Properties Management Plan (HPMP) for the three Projects. Abenaki tribal leaders and representatives will be invited to participate in developing both the PA and the HPMP. No Project effects on traditional cultural properties have been identified at this time. Any additional information provided by Tribal interests could, to the extent suitable, be incorporated into the HPMP.

Request for Waiver of Draft Biological Assessment in Amended FLA

Great River Hydro has been designated as the Commission's non-federal representative for purposes of informal consultation under Section 7 of the Endangered Species Act (ESA), and would therefore typically file a draft biological assessment (DBA) with its FLA, pursuant to section §5.18(b)(3)(ii) of the Commission's regulations. However, as Great River Hydro and stakeholders only recently reached consensus on operating parameters, there was insufficient time to conduct a meaningful assessment of the potential impacts of proposed operations on the ESA-listed Dwarf Wedgemussel prior to filing this amended FLA. Great River Hydro therefore requests a waiver of the requirement to file a DBA with the amended FLA; it will file a DBA within three months of this filing.

Contents and Format of the amended FLA Filings

Material	Wilder Project	Bellows Falls Project	Vernon Project
Cover Letter	Consolidated for all Projects		
Initial Statement/ Additional Information			
Exhibit A (Public and CEII) Exhibit B Exhibit C Exhibit D Exhibit F (info) Exhibit G (info) Exhibit H (Public and CEII)	Project- specific document as pdf	Project-specific document as pdf	Project-specific document as pdf
Exhibit E: Consolidated Environmental Report	Consolidated for all Projects		
Exhibit E-Appendix C (Privileged)	Consolidated for all Projects		
Exhibit F-Lg. Format Drawings (CEII)	Project-specific document as pdf	Project-specific document as pdf	Project-specific document as pdf
Exhibit G-Lg. Format Drawings	Project-specific document as pdf	Project-specific document as pdf	Project-specific document as pdf
Exhibit G-Project Boundary shapefile	Project-specific ArcGis zip file	Project-specific ArcGis zip file	Project-specific ArcGis zip file

Some information in each amended FLA (Portions of Exhibits A and H and Exhibit F drawings) contains Critical Energy Infrastructure Information (CEII), which has been removed from the public version of the amended FLA. In accordance with the Commission’s filing guidelines, this material will be filed separately as CEII. Similarly, locational information in the amended FLA pertaining to American bald eagle nesting sites (Exhibit E, Appendix C) will be filed as Privileged due to the sensitivity of the material. Hard copies of the amended FLA filed with FERC do not include Exhibit F and Exhibit G drawings as they have not been amended since they were filed on March 1, 2017.

Due to COVID-19, Great River Hydro will not have paper copies of the amended FLA available at the Project. However, electronic copies of the applications will be available on the public relicensing website at www.greatriverhydro-relicensing.com or via FERC's online e-Library at <https://elibrary.ferc.gov/IDMWS/search/fercgensearch.asp>, by searching FERC Project No's. P-1855, P-1892, and P-1904. In accordance with 18 C.F.R. §5.17(d)(2), Great River Hydro will publish public notice of the filing of the amended FLA twice in the following newspapers:

- The Valley News a daily newspaper in circulation in Grafton County, New Hampshire, and Windsor and Orange County, Vermont
- The Keene Sentinel, a daily newspaper in circulation in Cheshire County, New Hampshire
- The Brattleboro Reformer, a daily newspaper in circulation in Windham County, Vermont
- The Eagle Times a daily newspaper in circulation in Sullivan County, New Hampshire, and Windsor and Windham County, Vermont
- Journal Opinion, a weekly newspaper in circulation in Orange County, Vermont, and Grafton County, New Hampshire

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

Sincerely,



John L. Ragonese
FERC License Manager