



Great River Hydro

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June 24, 2021

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. 1855-050, 1892-030 and 1904-078
Exhibit F Supporting Design Report Supplements classified as CEII Material
PUBLIC Cover Letter**

Dear Secretary Bose:

Great River Hydro, LLC (“Great River Hydro”), owner and licensee of the Vernon (P-1904), Bellows Falls (P-1855) and Wilder (P-1892) Projects provides, enclosed, three Supporting Design Reports (SDR) pursuant to Section 4.4.1(g)(3) of the Commission’s regulations, as supplemental material to Great River Hydro’s Amended Final License Applications (AFLA), Exhibit F’s previously filed on December 7, 2020 for the three referenced Projects.

In its AFLAs, Great River Hydro filed amended final license applications for the three Projects. In its applications, GRH requested a waiver of the requirement in section 4.41(g)(3) of the Commission’s regulations to include an SDR in Exhibit F, indicating that the most recent dam safety inspection reports filed by GRH, pursuant to Part 12 of the Commission’s regulations, fulfilled the requirement for filing an SDR for each project.

In letter dated April 30, 2021, the Commission denied GRH’s request, stating that, in part, an SDR is required to demonstrate that existing and proposed structures and operations would be safe and adequate under any new license issued for a project. Great River Hydro was required, within 60 days of the Commission’s letter, to file an updated SDR for each Project that considered its proposal to operate each Project in a modified run-of-river mode by limiting impoundment fluctuations and project discharges.

While we are filing the SDRs recently developed by our Part 12 Independent Consultant GEI Consultants, Inc., as requested, in order to provide an up-to-date condition assessment of the

project's structure and stability, Great River Hydro is concerned about whether the FERC has an accurate understanding of GRH's Proposed Alternative. As stated in its letter of April 30, 2021, "*Great River Hydro's license applications include proposed measures that are not being implemented under the current licenses, such as the proposal to operate the projects in a modified run-of-river mode by limiting impoundment fluctuations and project discharges.*" GRH's Proposed Alternative **specifically does not limit** impoundment fluctuations for: 1.) any and all emergency situations; 2.) necessary grid support operations specified by the New England Independent System Operator including providing critical system reserves; 3.) performing capacity audits; and 4.) complying with existing high water operating procedures, identical to those under the current licenses, that specify impoundment WSEL's based on levels of anticipated inflows at each dam. Current operation of these projects as described in the respective Exhibit Bs clearly describe the use of full impoundment range of operation when implementing high water procedure, whereas normal non-spill operation does not exercise the full range. We acknowledge our intent is to operate and maintain a target elevation at the dam during much of the time, when normal operation and conditions exist, except for the limited discretionary flexible generation hours. However, there is no increase in dam safety risk associated with the GRH Alternative versus current operation.

The enclosed SDR's consider Great River Hydro's proposed operations, which include no change to high water operating procedures at the three Projects, and no change to the maximum allowable operating range under both normal, abnormal, emergency and grid constrained conditions. The SDRs find there are no impacts on the stability analyses for flood loading and no changes to the stability of the Projects due to the proposed operations.

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

Enclosures:

Critical Energy Infrastructure Information (CEII):

FERC Project No. 1892 Exhibit F Supporting Design Report, Wilder Hydroelectric Project

FERC Project No. 1855 Exhibit F Supporting Design Report, Bellows Falls Hydroelectric Project

FERC Project No. 1904 Exhibit F Supporting Design Report, Vernon Hydroelectric Project