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August 28, 2013

**VIA ELECTRONIC FILING**

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: TransCanada Hydro Northeast Inc., ILP Revised Study Plan for Project Nos. 1892-026, 1855-045, and 1904-073; Implications to RSP of the Decommissioning of the Vermont Yankee Nuclear Power Plant**

Dear Secretary Bose:

TransCanada Hydro Northeast Inc. (TransCanada) 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). The current licenses for these projects each expire on April 30, 2018. On October 31, 2012, TransCanada filed with the Federal Energy Regulatory Commission (FERC or Commission) its Notice of Intent (NOI) to seek new licenses for each project, along with a separate Pre-Application Document (PAD) for each project. On August 14, 2013 TransCanada submitted a single Revised Study Plan (RSP) for all three projects. According to the Integrated Study Process (ILP) schedule for the relicensing of these three projects, the first study year is 2014 and the second is 2015.

Entergy Corporation, owner of the Vermont Yankee Nuclear Power Plant (Vermont Yankee), yesterday announced it plans to decommission the plant in 2014. Vermont Yankee is located in Vernon, Vermont, less than one half mile upstream of TransCanada's Vernon Project. Vermont Yankee currently uses the Vernon impoundment as its source for cooling water; it is unclear when this use will end. This issue affects our studies (scope, methodology and schedule) and what comprises baseline conditions.

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The studies that are being developed under the ILP for the Projects, as set forth in TransCanada's RSP, are intended to examine baseline conditions and project operations on existing river characteristics that would exist during the term of the license. We anticipate that the decommissioning of Vermont Yankee will result in a change to baseline conditions for the Vernon Project sometime after implementation of the RSP and before a new license is issued. TransCanada needs to study the appropriate baseline (i.e., a baseline without the effects of Vermont Yankee) in order to understand how project operation will affect such conditions under a new license. Studies in the RSP that may be affected by the decommissioning of Vermont Yankee include as many as seven fish passage and water quality studies.

Further understanding of the implications of this unforeseen development is clearly warranted; however, TransCanada is uncertain how this will be addressed at this point in the ILP process. We recommend that FERC provide TransCanada with an additional 30 days from the date of this letter to consult with Entergy and stakeholders and potentially re-file any study plans that may need to be amended to reflect the changed baseline either in scope of work or timetable. This would also allow TransCanada time to gain a better understanding of the timing and effects of the Vermont Yankee decommissioning process. Subsequent stakeholder comments and FERC Study Plan Determination deadlines should be adjusted accordingly.

If there are any questions, please contact John Ragonese at 603-498-2851 or by emailing [john\\_ragonese@transcanada.com](mailto:john_ragonese@transcanada.com).

Sincerely,



John L. Ragonese  
FERC License Manager

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