



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New England Field Office
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In Reply Refer To: FERC Nos. 1904-073, 1855-045, and 1892-026 September 12, 2013
TransCanada Hydro Northeast Inc.
Connecticut River
SUPPLEMENTAL COMMENTS ON REVISED STUDY PLANS:
IMPACTS OF CLOSURE OF VERMONT YANKEE
NUCLEAR POWER PLANT ON RESULTS OF
PROPOSED STUDY PLANS

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Dear Secretary Bose:

By letter dated August 29, 2013, the U.S. Fish and Wildlife Service (Service) provided comments to the Federal Energy Regulatory Commission (Commission) on TransCanada's Revised Study Plan (RSP) for the relicensing of its Wilder, Bellows Falls, and Vernon projects, located on the Connecticut River in New Hampshire and Vermont.

As you may be aware, on August 27, 2013, Entergy Corp. announced that it would be closing the Vermont Yankee Nuclear Power Station in the "4th quarter of 2014." Vermont Yankee is located just upstream of the Vernon Dam in Vernon, Vermont, and has the potential to influence the aquatic communities in sections of the Connecticut River within the boundaries of the Vernon Project through two primary mechanisms: the discharge of heated effluent into the Connecticut River, and the impingement and entrainment of organisms at the system's cooling water intake structure.

Accordingly, the relevance of results obtained from some of the study plans proposed by TransCanada for the 2014 field season may not be valid moving forward. For example, results of studies examining migration and movement of adult and juvenile shad during 2014 (while Vermont Yankee is still operating and discharging thermal effluent) may be quite different from results obtained if these studies were conducted in 2015 (when Vermont Yankee will not be operating or discharging thermal effluent). As another example, Vermont Yankee entrains and impinges a large number of fish each year (an estimated 61.5 million larval fish entrained during a 26-week period [April 2006 to September 2006], and 38,604 fish impinged over a 20-month

sampling period [March 2005 through November 2006]). Any fish assemblage study results may be influenced by the presence or absence of this source of impingement/entrainment.

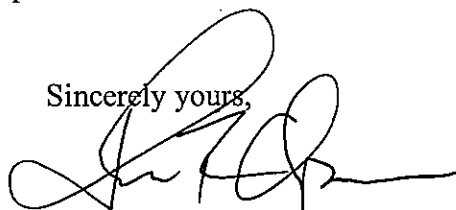
We are seeking Commission guidance on how to address this issue in the context of the Integrated Licensing Process timeline (which affords two years of study, beginning in 2014). Comments on TransCanada's RSP were due on August 29, 2013. The stakeholders only learned of Vermont Yankee's closing on August 27, 2013. This does not provide sufficient time to evaluate which proposed studies are most likely to be impacted by this action, nor time to develop any recommended changes to the study timelines to address resource issues associated with Vermont Yankee's closing.

We respectfully request the Commission to consider these options: (1) allow stakeholders an additional two weeks to provide supplemental comments on the RSP relative to the impact of Vermont Yankee's closing on the study plan timelines; (2) convene a stakeholder meeting to discuss how best to address the impact of Vermont Yankee's closing on study plan timelines and then incorporating the results of those discussions in the Commission's Study Plan Determination letter; or (3) require that those studies most likely to be impacted by Vermont Yankee's operation be conducted for two years, which would provide data both with and without the operation of Vermont Yankee.

The ecosystem "baseline" in sections of the Connecticut River within the boundaries of TransCanada's Vernon Project likely will change with the closure of Vermont Yankee, and as a result, we have concerns with the long-term applicability of results from some of the studies proposed for 2014.

Thank you for the opportunity to provide these supplemental comments on TransCanada's proposed study plans. We look forward to your response and guidance in this matter. If you have any questions regarding these comments please contact John Warner of this office at 603-223-2541.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Tom Chapman', written over the 'Sincerely yours,' text.

Thomas R. Chapman
Supervisor
New England Field Office

Kimberly D. Bose, Secretary
September 12, 2013

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