



December 2, 2015

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, FERC Project Nos. 2485 and 1889; Draft License Application

Dear Secretary Bose:

Pursuant to the regulations of the Federal Energy Regulatory Commission (Commission or FERC), Title 18 Code of Federal Regulations (18 C.F.R.) §5.16(c), FirstLight Hydro Generating Company (FirstLight) hereby submits this Draft License Application (DLA) as part of the Integrated Licensing Process (ILP) for the relicensing of the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889) and Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485). The current license for both the Turners Falls and Northfield Mountain Projects expires on April 30, 2016.

FirstLight is seeking to combine the Turners Falls Project and Northfield Mountain Project into a single license, and requests that the single project be designated as the Northfield Project, comprised of two developments to be called the Turners Falls Development and Northfield Mountain Pumped Storage Development. The DLA refers to the two developments and single project.

This DLA was prepared in lieu of a Preliminary Licensing Proposal (PLP), in accordance with Section 5.16(c) of the Commission's regulations. FirstLight filed a notice of its intent to file a DLA in lieu of the PLP as part of its September 14, 2015 filing of the Updated Study Report (USR).

Status of FERC-Approved Studies

On August 14, 2013, FirstLight filed with FERC its Revised Study Plan (RSP), which included a total of 38 studies. On August 27, 2013 Entergy Corporation announced that the Vermont Yankee Nuclear Power Plant (VY), located on the downstream end of the Vernon Impoundment on the Connecticut River and upstream of the FirstLight Projects, would be closing by December 29, 2014¹. With the closure of VY, certain environmental baseline conditions could have changed during the relicensing study period. On September 13, 2013, FERC issued its first Study Plan Determination Letter (SPDL) in which 20 studies were approved, or approved with FERC modifications. However, due to the impending closure of VY, FERC did not act on the remaining 18 aquatic related studies. The SPDL for these 18 studies were deferred until after FERC held a technical meeting with stakeholders on November 25, 2013 regarding any necessary

¹ The decommissioning of VY began on December 29, 2014.

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adjustments to the proposed and requested study designs and/or schedules due to the impending VY closure. FERC issued its second SPDL on the remaining 18 studies on February 21, 2014, approving the RSP with certain modifications. An additional Ichthyoplankton study emanating from a study dispute was added later bringing the total number of studies to 39.

On September 14, 2015, FirstLight filed its USR in which only summary reports were provided for many of the aquatic resource studies started in 2015. Of the 39 studies, FirstLight has filed completed reports on 14² studies. There are 24 studies still in progress and two (2) studies slated for the 2016 field season.

FirstLight's Proposal in the Draft License Application

The DLA includes a section on Proposed Actions and Alternatives, which typically includes, at a minimum, the no-action alternative and FirstLight's proposal. At this time, FirstLight's proposal is limited to two changes—modifications to the Project boundary and using more Upper Reservoir storage capacity at the Northfield Mountain Project. Since many of FirstLight's studies are not yet final, it would be premature for FirstLight to develop a complete licensing proposal for operating the Project in the new license term at this time. Once FirstLight's studies and TransCanada's studies are complete and FirstLight has had an opportunity to discuss the study results with resource agencies and other stakeholders, FirstLight will be in a better position to develop a comprehensive proposal for relicensing the Project.

Review of DLA and Filing of Comments

Pursuant to Section 5.16(e) of the Commission's regulations, comments on the DLA should be filed by March 1, 2016, 90 days after the date of this filing. Given that FirstLight's proposal for relicensing the Project is incomplete, FirstLight expects that stakeholders will reserve their right to provide substantive comments until after FirstLight has filed a more comprehensive proposal for relicensing the Project.

Exhibit F-Supporting Design Report

In 18 C.F.R. § 4.41(g) is Exhibit F, which consists of general design drawings and a supporting design report (SDR) relative to the safety of the Project. FirstLight respectfully requests a waiver of the requirement to submit a SDR as the Turners Falls and Northfield Mountain Projects are already subject to FERC Part 12 Dam Safety regulations. In addition, all supporting design reports are currently on file with the Commission's Division of Dam Safety and Inspections in the New York Regional Office.

Availability of DLA

Some information in the DLA is Critical Energy Infrastructure Information (CEII), which has been removed from the public version of the DLA. In accordance with the Commission's filing guidelines, all CEII is included in a separate volume and has been clearly marked as CEII, as it contains detailed Project facility diagrams and other information relating to the "production, generation, transportation, transmission, or distribution of energy." 18 C.F.R. § 388.113(c).

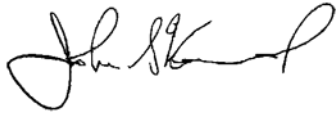
FirstLight is filing the DLA with the Commission electronically. To access the DLA on the Commission's website (<http://www.ferc.gov>), go to the "eLibrary" link, and enter the docket number, P-1889 or P-2485. FirstLight is also making the DLA available for download at the following website <http://www.northfieldrelicensing.com> (click on "Documents", and then "2015 Documents").

² One of the 14 studies required an interim report and final report (counted as two reports).

FirstLight is making the DLA available to the public at the Northfield Mountain Visitor's Center at 99 Millers Falls Road, Northfield, MA during regular business hours.

If you have any questions, or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Howard".

John Howard