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Burlington, MA 01803
P: 781-653-4240

February 22, 2024

Via Electronic Filing: timothy.m.jones@mass.gov

Mr. Timothy M. Jones
Legal and Policy Analyst
Bureau of Water Resources
Massachusetts Department of Environmental Protection
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Turners Falls Hydroelectric Project (FERC No. 1889), FirstLight MA Hydro LLC,
Northfield Mountain Pumped Storage Project (FERC No. 2485), Northfield Mountain LLC
Request for Pre-Filing Meeting for 401 Water Quality Certification.

Dear Mr. Jones:

FirstLight MA Hydro LLC is the owner and operator of the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889). Northfield Mountain LLC is the owner and operator of the Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485). The Turners Falls and Northfield Mountain Projects are collectively referred to herein as the Project or Projects. FirstLight Hydro LLC and Northfield Mountain LLC are collectively referred to herein as FirstLight.

On February 22, 2024, the Federal Energy Regulatory Commission (FERC) issued its Notice of Application Ready for Environmental Analysis (REA) for the Projects. FirstLight must file a request for Water Quality Certification (WQC) with the Massachusetts Department of Environmental Protection (MDEP) within 60 days of the REA Notice or by April 22, 2024.

In our telephone conference of June 27, 2023, FirstLight expressed an interest in holding a pre-application meeting approximately 30 days after issuance of the REA notice. In addition, on September 14, 2023, the United States Environmental Protection Agency announced the final 2023 Clean Water Action Section 401 Water Quality Certification Improvement Rule (2023 Rule), which went into effect on November 27, 2023. The 2023 Rule requires that all project proponents seeking certification for general licenses or permits submit a request for a meeting with the appropriate certifying authority at least 30 days prior to submitting a WQC request. Accordingly, FirstLight hereby requests a pre-filing meeting with MDEP relative to the WQC proceeding for the Projects on or before March 22, 2024.

To schedule that meeting, or if you have any questions or comments, please contact me at the email contact listed above.

Sincerely,

A handwritten signature in blue ink, appearing to read "JDW", with a horizontal line extending to the right.

Jennifer Daloisio
Senior Vice President, Corporate Operations