



February 13, 2020

VIA ELECTRONIC FILING

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

Crescent Hydroelectric Project, FERC Project No. 4678
Vischer Ferry Hydroelectric Project, FERC Project No. 4679
Additional Information on Comments Filed on Revised Study Plan and Responses to Comments on PSP

Dear Secretary Bose:

The purpose of this letter is to report ongoing efforts of the Power Authority of the State of New York (Power Authority), licensee of the Crescent and Vischer Ferry Hydroelectric Projects (Projects), FERC Nos. 4678 and 4679, respectively, to repair the fish deterrent system at the Crescent Power Plant, and to clarify how the Power Authority proposes to accommodate these repairs in the Revised Study Plan (RSP) for the relicensing of the Projects.

The Power Authority filed the RSP with the Federal Energy Regulatory Commission (FERC) on January 21, 2020. Stakeholders then submitted comments on the RSP by February 5, 2020.

One such comment was submitted by the New York State Department of Environmental Conservation (NYSDEC) on February 5, 2020 (FERC Submittal 20200206-5013), whose letter included comments on the Power Authority's proposed Blueback Herring Downstream Migration Study (RSP Section 2.3.1).

The Power Authority explains in Section 2.3.1 of the RSP that the Crescent Power Plant's fish deterrent system has experienced operational abnormalities. The Power Authority explains that its troubleshooting concluded that the submarine power cable experienced water intrusion, compromising the power needs of the sound projectors. Consequently, the Power Authority reported in the RSP that it is currently in the process of ordering a new submarine power cable and has notified the resource agencies regarding this matter. Based on consultation with the manufacturer that the installation of the new power cable will not occur until summer 2020, the Power Authority proposed in the RSP that passage routing studies for blueback herring would be unreasonable during the first season of the relicensing studies—because the deterrent system would not be fully operational during the entire season, any data obtained during the first season would not be representative of normal deterrent system operation conditions. Instead, the Power Authority proposed in the RSP to use existing information and data to prepare a White Paper to evaluate downstream passage routes and whole station survival for blueback herring at the Projects.

To clarify these points raised by NYSDEC and U.S. Fish and Wildlife Service (USFWS), the Power Authority first recognizes the importance of keeping resource agencies informed of status changes to the Projects' fish deterrence systems. The Power Authority did in fact speak to Chris Hogan at NYSDEC in a telephone call on December 19, 2019, to inform NYSDEC of the operational issues surrounding the fish deterrent system at the Crescent Project. Additionally, on the same day the Power Authority had a similar call with John Wiley of the U. S. Fish and Wildlife Service, as referenced in its RSP comment letter.

With regard to USFWS's concern regarding studies needed to inform an assessment of the Projects' impacts on the movement of blueback herring, because the fish deterrent system will not be fully operational during the entire first season of studies, any fieldwork conducted will not produce information to inform such an analysis. For this reason, the RSP proposes an assessment using existing information. If the results of this assessment suggest that additional field data is needed, the second study season will be available to complete such work, as noted in NYSDEC's February 5 comment letter.

Finally, regarding the status of the repair work for the fish deterrent system itself, the Power Authority continues to work diligently to procure the needed equipment and make the repair. In December 2019, the Power Authority prepared a design drawing for review by three contractors that includes the fish deterrent system provider, the underwater cable manufacturer, and the underwater connector manufacturer. That review was completed in January 2020 and the procurement process is now underway, with an anticipated fulfillment of Summer 2020.

The Power Authority looks forward to continuing to work with the Commission, resource agencies, Native American nations, local governments, and members of the public on the relicensing of the Crescent and Vischer Ferry Projects. If you have any questions regarding the above comments, please do not hesitate to contact me. Information regarding the relicensing of the Crescent and Vischer Ferry Projects can be found at the Power Authority's relicensing website at <http://www.nypa.gov/cvf>.

Sincerely,



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