April 3, 2015

Director
New Hampshire Department of Environmental Services
Water Division
6 Hazen Drive P.O. Box 95
Concord, NH 03302

RE: Ashuelot River Dam Project, FERC No. P-14471

Dear Sir or Madam:

The Federal Energy Regulatory Commission will review the following small hydro project for a Licensing through the Traditional Licensing Process (TLP) for the nonprofit, West Street Hydro, Inc.

Enclosed is a copy of the Letter Requesting Use of the Traditional Licensing Process submitted by West Street Hydro, Inc. to FERC. Information about the TLP process can be found at the following website:


Sincerely,

Kenneth Stewart
Project Director
West Street Hydro
kstewart@mcmxi.com

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DEPARTMENT OF
ENVIRONMENTAL SERVICES

20 CENTRAL SQUARE KEENE NH 03431
Letter Requesting Use of the Traditional Licensing Process

March 31, 2015

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

Subject: Request for Approval to Use the Traditional Licensing Process for the Ashuelot River Dam Restoration Project, Project No. P-14471

Dear Secretary Bose:

Pursuant to Section 5.3 of the Commission’s regulations, 18 CFR § 5.3, the West Street Hydro (WSH) hereby requests use of the Traditional Licensing Process (“TLP”) for the licensing of the Ashuelot River Dam Restoration Project (“Project”). Concurrent with this filing, but under separate cover, the West Street Hydro is filing its Notification of Intent and Pre-Application Document for the Project.

We address below the following considerations to justify our request to use the TLP.

Likelihood of Timely License Issuance [18 CFR § 5.3(c)(1)(ii)(A)]

(Address how use of the TLP would expedite the issuance of a license for your project)

West Street Hydro is a small non-profit organization interested in potentially restoring the hydropower capacity of the 250 year old Ashuelot River Dam in Keene, New Hampshire. West Street Hydro does not anticipate any significant resource issues in the future. The Integrated Licensing Process (ILP) is an intensive and front-loaded process that is more appropriate for larger and more controversial process than our Project. Due to its built-in opportunities for collaboration and consultation, and the limited resources West Street Hydro, the TLP is more appropriate avenue for timely issuance.

Additionally, West Street Hydro has 14 months remaining in its preliminary permit which does not meet the requirements to complete an ILP. West Street Hydro would be required to file numerous extensions to complete necessary steps of the ILP delaying licensing and eliminating project potential.

Complexity of the Resource Issues [18 CFR § 5.3(c)(1)(ii)(B)]

(Explain level of complexity for each resource for the project)
As provided in the PAD, the resource issues arising through the Ashuelot River Hydro Project are minimal. While more up-to-date studies could be conducted, West Street Hydro is committed to adequately address the resulting issues in conjunction with the City of Keene. West Street Hydro has demonstrated a strong commitment to engaging local stakeholders, the TLP would better allow West Street Hydro to work with them to resolve the issues than the ILP.

**Level of Anticipated Controversy [18 CFR § 5.3(c)(1)(ii)(C)]**

West Street Hydro anticipates the level of controversy to be low, due to the Project’s community support and the addition of generating reliable green energy. The Project is not anticipated to result in significant resource impacts, and using the TLP will involve active consultation with the resource agencies and stakeholders.

**Relative Cost of the Traditional Licensing Process Compared to the Integrated Licensing Process [18 CFR § 5.3(c)(1)(ii)(D)]**

(Address how the TLP would cost less than the ILP)

The traditional process is expected to be less costly, as well, without the significant process-related time burden of the ILP. Utilizing the TLP will be a more efficient use of time by West Street Hydro considering the limited scope of the Project. The TLP does allow sufficient opportunity for input by resource agencies and other stakeholders, but requires less time commitment which provides time and cost saving to the agencies and the City of Keene.

**The Amount of Available Information and Potential for Significant Disputes Over Studies [18 CFR § 5.3(c)(1)(ii)(E)]**

(Discuss the available information about the project’s environmental setting, potential effects on the environment, and how it would relate to the potential for disputes over the need for resource studies)

Due to the limited geographic scope of the potential Project impacts, an integrated study plan is envisioned to generate the needed information to support the development of the license application. Given the productive exchange and agreement from agencies and stakeholders to date on the reconnaissance level studies and the collective understanding of the relative scope of potential impacts that need to be studied, West Street Hydro does not anticipate significant disputes over studies.

**Other Pertinent Factors [18 CFR § 5.3(c)(1)(ii)(F)]**

(Address any other pertinent factors that would support using the TLP process)
The scope of the Project is small compared to other hydroelectric projects. After numerous upgrades, West Street Hydro anticipates the hydroelectric facility will produce reliable green energy to serve the residents and utility customers of the City of Keene. Since the quantity of electricity generated will be small, the hydropower facility will provide an excellent education opportunity for residents and local school children to learn about hydropower.

For all of the foregoing reasons, the West Street Hydro respectfully requests that the Commission grant this request and authorize the West Street Hydro to use the TLP for the licensing of the Project.

As required by 18 CFR § 5.3(d)(1), the West Street Hydro is concurrently providing copies of this request to all affected resource agencies, Indian tribes, and potentially interested parties. As required by 18 CFR § 5.3(d)(2), the West Street Hydro is publishing notice of this request simultaneously with the publication of notice of availability of the NOI and PAD in a Keene Sentinel of general circulation in the counties where the Project is located.

By this letter, the West Street Hydro is notifying the resource agencies, Indian tribes, and potentially interested parties that comments on this application must be provided to the Commission and the West Street Hydro no later than 30 days following the filing date of this document. All comments should reference P-14471, Ashuelot River Dam Restoration Project, and they should address, as appropriate to the circumstances of the request, the following topics:

- Likelihood of timely license issuance;
- Complexity of the resource issues;
- Level of anticipated controversy;
- Relative cost of the TLP compared to the ILP;
- The amount of available information and potential for significant disputes over studies; and
- Other factors believed by the commenter to be pertinent.

Comments should be submitted to the Commission electronically pursuant to 18 CFR § 385.2003(c), or by sending an original and eight copies to:

Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Copies of the comments should be sent to:
West Street Hydro, Inc.
PO Box 323
20 Central Square
Keene, NH 03431

Respectfully submitted,

[Signature]

Kenneth Stewart
Director
West Street Hydro, Inc.