

Brookfield Renewable Erie Boulevard Hydropower, L.P. 33 West 1st Street South Fulton. New York 13069 Tel 315.593.3118 Fax 315.598.4831 www.brookfieldrenewable.com

February 26, 2021

VIA E-FILING

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

SUBJECT: West Canada Creek Project (FERC No. 2701-059) Final License Application

Dear Secretary Bose:

Erie Boulevard Hydropower, L.P. (Erie or Licensee), a Brookfield Renewable company, is the Licensee, owner and operator of the West Canada Creek Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC or Commission) Project No. 2701. The West Canada Creek Project consists of two developments, Prospect and Trenton, located on West Canada Creek in Oneida and Herkimer counties, New York. The current license for the West Canada Creek Project expires on February 28, 2023. Erie is pursuing a new license for the Project using the FERC Integrated Licensing Process (ILP) pursuant to 18 C.F.R. Part 5 of the Commission's regulations. Erie must file its final application for a new license with FERC no later than February 28, 2021.

In accordance with 18 CFR § 5.16(c), Erie respectfully submits the Final License Application (FLA) for filing with the Commission. The FLA is being filed in accordance with the ILP and consists of the following technical exhibits and environmental report:

Volume I of III: Public

- Initial Statement;
- Exhibit A Project Description;
- Exhibit B Project Operation and Resource Utilization;
- Exhibit C Construction History;
- Exhibit D Statement of Cost and Financing;
- Exhibit G Project Maps; and
- Exhibit H Description of Project Management and Need for Project Power.

Volume II of III

• Exhibit E - Environmental Report.

Volume III of III: Contains Critical Energy Information (CEII);

- Exhibit F General Design Drawings and the Supporting Design Report (SDR); and
- Exhibit H- Appendix H-1 -Single-line Diagram.

Kimberly D. Bose, Secretary West Canada Creek FLA Page 2 of 2

In accordance with the Commission's Order No. 630 (68 FR 9857), Exhibit F, including the SDR, and Appendix H-1 of Exhibit H (Single-line Diagram) contains Critical Energy Information and is being submitted under separate cover for the Commission's non-public file (Volume III). Exhibit F contains sensitive and detailed engineering information that, if used incorrectly, may compromise the safety of the Project and those responsible for its proper operation. Members of the public requesting CEII information for the West Canada Creek Project must comply with the Commission's procedures for obtaining access to CEII as required under CFR § 388.113. All public requests for CEII should be made to the Commission's CEII Coordinator.

Volume II, Exhibit E, Environmental Report, discusses the results of the studies conducted in support of the relicensing and considers how the information and data collected during those studies addresses issues that were raised by agencies and other relicensing participants. In support of this proposal, Exhibit E evaluates the potential impacts to environmental, recreational, and cultural resources that may occur as a result of continued Project operation under a new license. Exhibit E includes Erie's proposals for the protection and mitigation of effects on, or enhancement to, resources that are associated with the continued operation of the Project. Exhibit E also includes stakeholder comments regarding the Draft License Application, and Erie's responses, as appropriate.

Erie is providing electronic copies of the FLA to relevant resource agencies, tribes, nongovernmental organizations, and other potential interested parties included on the attached distribution list. An electronic copy of the FLA can be downloaded from FERC's eLibrary system (<u>https://elibrary.ferc.gov/eLibrary/search</u>) by searching under docket number P-2701 (sub docket 059). The FLA will also be available at the Project's public relicensing website at <u>https://westcanadacreek.brookfieldusprojects.com/</u>.

Erie is providing two courtesy paper copies of the FLA to the FERC Office of Energy Projects (Room 61-02) and to the Office of General Counsel-Energy Projects (Room 101-56). Erie will publish a notice of the filing of this FLA twice in two Project area newspapers, the Observer-Dispatch and the Times Telegram, and will file proof of publication with FERC once available.

If you have any questions or require any additional information, please contact me at (315) 598-6130 or via email at steven.murphy@brookfieldrenewable.com.

Sincerely,

DE P. Munny

Steven Murphy Director, Licensing Brookfield Renewable

Attachments: Final License Application for the West Canada Creek Hydroelectric Project cc: Distribution List

Federal Governmental Agencies

John Eddins Archaeologist/Program Analyst Advisory Council on Historic Preservation Office of Federal Agency Programs 401 F Street NW, Suite 308 Washington, DC 20001-2637 jeddins@achp.gov

Bruce Maytubby Bureau of Indian Affairs Eastern Regional Office 545 Marriott Drive, Suite 700 Nashville, TN 37214 Bruce.Maytubby@bia.gov

Michael Pentony Regional Administrator National Oceanic and Atmospheric Administration Greater Atlantic Regional Fisheries Office 55 Great Republic Drive Gloucester, MA 01930-2276 Michael.Pentony@noaa.gov

U.S. Army Corps of Engineers, Buffalo District Attn: Regulatory Branch 1776 Niagara Street Buffalo, NY 14207-3199 LRB.Regulatory@usace.army.mil

Andrew Raddant Regional Environmental Officer U.S. Department of the Interior Office of Environmental Policy and Compliance, Northeast Region 15 State Street, 8th Floor Boston, MA 02109 andrew_raddant@ios.doi.gov

U.S. Department of the Interior Office of the Solicitor, Northewater Region 15 State St. 8th Floor Boston, MY 02109 DOISONLNE-FERC@sol.doi.gov

Lingard Knutson Environmental Scientist U.S. Environmental Protection Agency, Region 2 Strategic Programs Office 290 Broadway, 26th Floor New York, NY 10007 knutson.Lingard@epa.gov David Stilwell U.S. Fish and Wildlife Service New York Field Office, Region 5 3817 Luker Road Cortland, NY 13045 david_stilwell@fws.gov

John Wiley U.S. Fish and Wildlife Service New York Field Office, Region 5 3817 Luker Road Cortland, NY 13045 john_wiley@fws.gov

Kevin Mendik Environmental Protection Specialist U.S. National Park Service 15 State Street Boston, MA 02109 Kevin_Mendik@nps.gov

Duncan Hay National Park Service, Northeast Region 15 State Street Boston, MA 02109 duncan_hay@nps.gov

State Governmental Agencies

Jonathan Binder Chief, Energy and Climate Change Section Office of General Counsel, New York State Department of Environmental Conservation 625 Broadway Albany, NY 12233-0001 jonathan.binder@dec.ny.gov

Chris Hogan New York State Department of Environmental Conservation 625 Broadway, 4th Floor Albany, NY 12233 cmhogan@gw.dec.state.ny.us

Todd Phillips New York State Department of Environmental Conservation Div of Environmental Permits, Region 6 Utica Sub Office 207 Genesee Street Utica, NY 13501 todd.phillips@dec.ny.gov

Terry Tyoe Regional Permit Administrator New York State Department of Environmental Conservation Div of Environmental Permits, Region 6 Utica Sub Office Utica State Office Building 207 Genesee Street, Room 1404 Utica, NY 13501-2885 dep.r6@dec.ny.gov

Sita Crounse Office of General Counsel, New York State Department of Environmental Conservation 625 Broadway Albany, NY 12207 Sita.Crounse@dec.ny.gov

Richard McDonald Aquatic Biologist New York State Department of Environmental Conservation 317 Washington Street Watertown, NY 13601 richard.mcdonald @dec.ny.gov

David Erway Aquatic Biologist New York State Department of Environmental Conservation Utica, NY 13501 david.erway@dec.ny.gov

Matt Walter Habitat Biologist New York State Department of Environmental Conservation 207 Genessee Street Utica, NY 13501 matthew.walter@dec.ny.gov

Christopher Balk Habitat Manager New York State Department of Environmental Conservation 317 Washington Street Watertown, NY 13601 christopher.balk@dec.ny.gov

Thomas Vigneault Regional Water Engineer New York State Department of Environmental Conservation Utica, NY 13501 thomas.vigneault@dec.ny.gov Hon. Kathleen H. Burgess Secretary to the Commission New York State Public Service Commission Empire State Plaza Agency Building 3 Albany, NY 12223-1350 secretary@dps.ny.gov

James Denn Public Information Officer New York State Public Service Commission Empire State Plaza Agency Building 3 Albany, NY 12223-1350 james.denn@dps.ny.gov

Cindy Brady Business Development Manager, Licensing New York Power Authority 123 Main Street White Plains, NY 10601 cindy.brady@nypa.gov

Jeffrey Cohen Deputy Director New York State Canal Corporation 30 S. Pearl Street, 5th Floor Albany, NY 12207 Jeffrey.Cohen@canals.ny.gov

Erik Kulleseid Commissioner New York State Office of Parks, Recreation, & Historic Preservation Empire State Plaza Agency Building 1 Josalyn.Ferguson@parks.ny.g+F34ov Albany, NY 12238 Erik.Kulleseid@parks.ny.gov

Michael Lynch Division Director New York State Division for Historic Preservation, NYS office of Parks, Recreation and Historic Preservation Peebles Island State Park P.O. Box 189 Waterford, NY 12188-0189 michael.lynch@parks.ny.gov

Daniel Bagrow Historic Preservation Program Analyst New York State Division for Historic Preservation Peebles Island State Park P.O. Box 189 Waterford, NY 12188-0189 dan.bagrow@parks.ny.gov

Dr. Josalyn Ferguson Scientist Archaeology Historic Preservation Program Analyst New York State Division for Historic Preservation Peebles Island State Park P.O. Box 189 Waterford, NY 12188-0189

Joanne Mitchell Assistant Regional Manager New York State Office of Parks, Recreation, & Historic Preservation Central Regional Office 6105 E. Seneca Turnpike Jamesville, NY 13078 joanne.mitchell@parks.ny.gov

Matthew Maraglio Coastal Review Specialist New York Department of State Office of Coastal, Local Government, and Community Sustainability One Commerce Plaza 99 Washington Avenue Albany, NY 12231-0001 Matthew.Maraglio@dos.ny.gov

Consistency Review Unit New Your Department of State Division of Coastal Resources 99 Washington Avenue Albany, NY 12231-0001

Legislative Bodies

Kirsten Gillibrand U.S. Senate Leo W. O'Brien Federal Office Building 11A Clinton Avenue, Room 821 Albany, NY 12207

Charles Schumer U.S. Senate 100 South Clinton Street, Room 841 Syracuse, NY 13261 Elise Stefanik U.S. Congress 88 Public Square, Suite A Watertown, NY 13601

Claudia Tenney U.S. Congress 22nd District of New York 430 Court Street Suite 102 Utica, NY 13502

Robert Smullen New York State Assembly, District 118 235 North Prospect Street Herkimer, NY 13350 smullenr@nyassembly.gov

Joseph Griffo New York State Senate, District 47 207 Genesee Street, Room 408 Utica, NY 13501 griffo@nysenate.gov

James Tedisco New York State Senate, District 49 636 Plank Road, 2nd Floor Clifton Park, NY 12065-2046 tedisco@nysenate.gov

<u>Counties</u>

Sylvia Rowan Herkimer County Clerk 109 Mary Street, Suite 1111 Herkimer, NY 13350 smrowan@herkimercounty.org

Patrick Russell District 15, County Legislature Herkimer County 109 Mary Street, Suite 1310 Herkimer, NY 13350 legislatorrussell@roadrunner.com

James Wallace County Administrator Herkimer County 109 Mary Street, Suite 1310 Herkimer, NY 13350 jwwallace@herkimercounty.org

William Weakly District 17, County Legislature Herkimer County 109 Mary Street, Suite 1310 Herkimer, NY 13350 wweakley@ntcnet.com

Sandra DePerno Oneida County Clerk Oneida County Office Buildings 800 Park Avenue Utica, NY 13501 countyclerk@ocgov.net

Anthony Picente Executive Oneida County Oneida County Office Buildings 800 Park Avenue #10 Utica, NY 13501 ce@ocgov.net

Steven R. Boucher District 6 County Board Legislator Oneida County 9812 Twin Roak Road Remsen, NY 13438 sboucher@ocgov.net

Philip Sacco District 9 County Board Legislator Oneida County 11371 Bell Hill Road Deerfield, NY 13502 psacco@ocgov.net

<u>Towns</u>

Frances Donley Supervisor Town of Russia 8916 N. Main Street PO Box 126 Poland, NY 13431 supervisor@ntcnet.com

Roger Helmer Supervisor Town of Remsen PO Box 308 10540 Academy Lane Remsen, NY 13438 remsensupervisor@roadrunner.com Joseph Smith Supervisor Town of Trenton PO Box 206 8520 Old Poland Road Barneveld, NY 13304 supervisor@town.trenton.ny.us

Stanley Harris Town Clerk Town of Trenton PO Box 206 8520 Old Poland Road Barneveld, NY 13304 townclerk@town.trenton.ny.us

<u>Tribes</u>

Ray Hallbritter National Representative Oneida Indian Nation 2037 Dreamcatcher Plaza Oneida, NY 13421

Jesse Bergevin Historian Oneida Indian Nation 2037 Dreamcatcher Plaza Oneida, NY 13421 jbergevin@oneida-nation.org

Michael Conners, Jr. Tribal Chief Saint Regis Mohawk Tribe 412 State Route 37 Akwesasne, NY 13655

Beverly Cook Tribal Chief Saint Regis Mohawk Tribe 412 State Route 37 Akwesasne, NY 13655

Tony David Environmental Director Saint Regis Mohawk Tribe 412 State Route 37 Akwesasne, NY 13655

Arnold Printup Saint Regis Mohawk Tribe 412 State Route 37 Akwesasne, NY 13655

Eric Thompson Tribal Chief Saint Regis Mohawk Tribe 412 State Route 37 Akwesasne, NY 13655

Tehassi Hill Chairman Oneida Tribe of Indians of Wisconsin PO Box 365 Oneida, WI 54155-0365

Non-Governmental Organizations

Bob Irvin President American Rivers 1101 14th Street NW, Suite 1400 Washington, DC 20005 birvin@americanrivers.org

Robert Nasdor Northeast Stewardship Director American Whitewater 365 Boston Post Road, Suite 250 Sudbury, MA 01776 bob@americanwhitewater.org

David Klein The Nature Conservancy Central and Western New York Chapter 1048 University Avenue Rochester, NY 14067 dklein@tnc.org

Paul Sitroli Co-Chair Adirondack Mountain Club, Iroquois Chapter 9435 Chapman Road New Hartford, NY 12413 psirtoli@hotmail.com

Doug Tinkler Co-Chair Adirondack Mountain Club, Iroquois Chapter 4 Clintonview Road New Hartford, NY 12413 dt46x40@yahoo.com

Brian Sanders Conservation Adirondack Mountain Club, Iroquois Chapter 7 Bolton Road New Hartford, NY 13413 David Corr Mohawk Valley Chapter of Trout Unlimited New York Conservation Fund Advisory Board 28 Sanger Avenue New Hartford, NY 12413 dkcorr@roadrunner.com

Pat Becher Executive Director Mohawk Valley Water Authority 1 Kennedy Plaza #3 Utica, NY 13502 pbecher@mvwa.us

William Wellman Region 5 Vice President New York State Council of Trout Unlimited 7 Helen Street Plattsburgh, NY 12901 wellman1985@gmail.com

Paul W. Miller New York State Council of Trout Unlimited 3825 Miller Road Blossvale, NY 13308 pmiller3825@yahoo.com

John Montefusco CEO Trout Power PO Box 51 Cold Brook, NY 13324 jmontefusco@msn.com

Kathy Kellogg West Canada Riverkeepers/West Canada Watershed Alliance 8180 State Route 28 Barneveld, NY 13304 kathlog@msn.com

West Canada Creek Campground 12275 State Route 28 Poland, NY 13431 camp@westcanadacreekcampsites.com

Herkimer KOA Resort Campground 4626 State Route 28 Harkimer, NY 13350 hdmkoa@ntcnet.com

Blake Bellinger Citizens for Hinckley PO Box 382 Fultonville, NY 12072 Bla19ke@yahoo.com

Elisabetta T. DeGironimo GIS Coordinator Mohawk Valley Water Authority 1 Kennedy Plaza Utica, NY 13502 edegironimo@mvwa.us

Erie Boulevard

Jon Elmer Director, Operations Brookfield Renewable 800 Starbuck Avenue, Suite 802 Watertown, NY 13601 jon.elmer@brookfieldrenewable.com

Pat Storms Senior Manager, Operations Brookfield Renewable 800 Starbuck Avenue, Suite 802 Watertown, NY 13601 patrick.storms@brookfieldrenewable.com

Rick Heysler Manager, Operations Brookfield Renewable 8526 Trenton Falls Road Barneveld, NY 13304 richard.heysler@brookfieldrenewable.com

Steve Murphy Director, Licensing Brookfield Renewable 33 West 1st Street, South Fulton, NY 13069 steven.murphy@brookfieldrenewable.com

VOLUME I FINAL LICENSE APPLICATION

INITIAL STATEMENT, EXHIBIT A, B, C, D, G AND H

West Canada Creek Hydroelectric Project FERC No. 2701-NY



Submitted by:

Erie Boulevard Hydropower, L.P. Fulton, New York

Prepared by:

Kleinschmidt

February 2021

WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

INITIAL STATEMENT

BEFORE THE UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

West Canada Creek Hydroelectric Project

FERC Project No. 2701

APPLICATION FOR LICENSE FOR A MAJOR PROJECT – EXISTING DAM

INITIAL STATEMENT

(Pursuant to 18 CFR §4.51)

- Erie Boulevard Hydropower, L.P. (Erie or Licensee), a Brookfield Renewable company (Brookfield), applies to the Federal Energy Regulatory Commission (FERC or Commission) for a new license for the West Canada Creek Hydroelectric Project (Project), FERC Project No. 2701, an existing major project, as described in the attached exhibits. The current license was issued by order dated March 18,1983 (22 FERC I 62,347), with a license expiration date of February 28, 2023.
- 2. The location of the Project is:

State: New York Counties: Oneida and Herkimer Towns: Trenton and Russia Stream or Body of Water: West Canada Creek

3. The exact name and business address of the applicant are:

Erie Boulevard Hydropower, L.P. 399 Big Bay Road Queensbury, New York 12804 The exact name and business address of each person authorized to act as agent for the applicant in this application are:

Steven Murphy	Jon Elmer
Director, U.S. Licensing	Director of Operations
Erie Boulevard Hydropower, L.P.	Erie Boulevard Hydropower, L.P.
33 West 1 st Street South	800 Starbuck Avenue, Suite 201
Fulton, New York 13069	Watertown, New York 13601

- 4. Erie Boulevard Hydropower, L.P. is a domestic corporation and is not claiming preference under Section 7(a) of the Federal Power Act, 16 U.S.C.A. §800.
- 5. (i) The statutory or regulatory requirements of the State of New York, the state in which the Project is located, which would, assuming jurisdiction and applicability, affect the Project with respect to bed and banks, and to the appropriation, diversion and use of water for power purposes, and with respect to the right to engage in the business of developing, transmitting and distributing power, and in any other business necessary to accomplish the purposes of the license under the Federal Power Act are:
 - a. Authorization to conduct the business of generation, transmission, and distribution of electricity pursuant to Article 2 of New York's Transportation Corporation Law.
 - b. Water Quality Certification (WQC) pursuant to Title 6 of New York Codes, Rules and Regulations (NYCRR) Section 608.9 and Section 401 (a)(1) of Public Law 92-500 as amended by Public Law 95-217 (Clean Water Act of 1977), 33 U.S.C. Section 1341.

(ii) The steps the Applicant has taken, or plans to take, to comply with each of the laws cited above are:

- a. Applicant has complied with the requirements of the laws of the State of New York with respect to the right to engage in the business of developing and transmitting power.
- b. Applicant will apply to the New York Department of Environmental Conservation (NYSDEC) for a Water Quality Certification no later than 60 days after FERC issues the notice of acceptance and ready for environmental analysis per 18 CFR 5.23.
- 6. All existing Project facilities are owned by Erie Boulevard Hydropower, L.P.

- 7. The West Canada Creek Project consists of two developments; the Prospect Development and the Trenton Falls Development. Together these developments have a combined capacity of 39.8 MW.
- 8. The Project does not occupy any lands of the United States.
- 9. Project is an existing constructed project; no additional construction is proposed.

VERIFICATION STATEMENT

THE FOLLOWING INFORMATION IS PROVIDED PURSUANT TO 18 CFR §5.18(A) AND §4.32(A) OF THE COMMISSION'S REGULATIONS:

- 1. Erie Boulevard Hydropower, L.P. possesses all proprietary rights necessary to construct, operate or maintain the Project.
- 2. The name and mailing address of the counties in which any part of the Project and any federal facilities that would be used by the project are located:

The West Canada Creek Project is located in Oneida and Herkimer counties, New York.

Oneida County ClerkHerkimer County ClerkOneida County Office Building109 Mary Street, Suite 1111800 Park AvenueHerkimer, New York 13350Utica, New York 13501Herkimer, New York 13350

There are no federal facilities used by the West Canada Creek Project.

3. The name and mailing address of every city, town, or similar local political subdivision in which any part of the project and any federal facilities that would be used by the project are located:

The West Canada Creek Project is located in the Town of Russia in Herkimer County, New York, and the Town of Trenton in Oneida County, New York.

Town of Russia 8916 North Main Street P O Box 126 Poland, New York 13431 Town of Trenton PO Box 206 8520 Old Poland Road Barneveld, New York 13304

There are no federal facilities used by the West Canada Creek Project.

4. The name and mailing address of every city, town, or similar local political subdivision that has a population of 5,000 or more people and is located within 15 miles of the project dam:

Town of Marcy 8801 Paul Becker Road	City of Utica 1 Kennedy Plaza
Marcy, New York 13403	Utica, New York 13502
City of Rome	City of New Hartford
198 North Washington Street	Town of New Hartford
Rome, New York 13440	48 Genesee Street
	New Hartford, New York 13413
Town of Lee	
5808 Stokes Lee Center Road	City of Frankfort
PO Box 191	201 Third Avenue
Lee Center, New York 13363	Frankfort, New York 13340

- 5. There are no irrigation districts, drainage districts, or similar special purpose political subdivisions in which any part of the project is located or affected as outlined in 18 CFR §4.32 l(a)(2)(iii)(A) and (B).
- 6. Every other political subdivision in the general area of the Project that there is reason to believe would likely be interested in, or affected by, this notification:

Mohawk Valley Water Authority 1 Kennedy Plaza Utica, New York 13502

7. The names and mailing addresses of potentially affected Indian tribes:

Oneida Indian Nation Ray Halbritter, Nation Representative 2037 Dreamcatcher Plaza Oneida, New York 13421

Oneida Tribe of Indians of Wisconsin N7210 Seminary Road Oneida, WI 54155 St. Regis Mohawk Tribe Michael Conners, Jr. Chief Beverly Cook, Chief Eric. Thompson, Chief 412 State Route 37 Akwesasne, New York 13655

- 8. For a license (other than a license under Section 15 of the Federal Power Act) state that the Applicant, in accordance with 18 CFR 4.32(a)(3), made a good-faith effort to notify, by certified mail, the following entities of the filing of this application:
 - a) Every property owner of record of any interest within the bounds of the Project;
 - b) The entities listed in (2) above;
 - c) Other governmental agencies that would likely be interested in or affected by the application.

This requirement does not apply because Erie is applying for a new license for an existing Project under Section 15 of the Federal Power Act.

SUBSCRIPTION

This Application for New License for the West Canada Creek Project, FERC Project No. 2701, is executed in the State of New York, County of Warren, by Thomas Uncher, Vice President of Erie Boulevard Hydropower, LP, 399 Big Bay Road, Queensbury, NY 12804, who, being duly sworn, deposes and says that the contents of this application are true to the best of his knowledge or belief and that he is authorized to execute this application on behalf of Erie Boulevard Hydropower, LP. The undersigned has signed this application this ____ day of February, 2021.

Erie Boulevard Hydropower, L.P.

By: 1

Thomas Uncher Vice President

VERIFICATION

Subscribed and sworn to before me, a Notary Public of the State of New York this $\frac{254}{10}$ day of February, 2021.

Brenda Schermerhoin

(Notary Public)

(My Commission Expires <u>ઉપ્પુ વે, વેળ્વે</u>રે)/seal

BRENDA J. SCHERMERHORN NOTARY PUBLIC, State of New York Reg. No. 01SC6169934 Qualified in Saratoga County My Commission Expires July 2, 2023 WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

Ехнівіт А

PROJECT DESCRIPTION

TABLE OF CONTENTS

1.0	GENERAL PROJECT DESCRIPTION		
2.0	PROS	PECT DEVELOPMENT	3
	2.1	Project Structures	3
		2.1.1 Dam	3
		2.1.2 Intake and Conveyance System	3
	2.2	Impoundment	3
	2.3	Bypass Reach	
	2.4	Generating Equipment	4
	2.5	Transmission Facilities	
	2.6	Ancillary Equipment	5
3.0	TREN	TON DEVELOPMENT	9
	3.1	Project Structures	9
		3.1.1 Dam	
		3.1.2 Intake and Conveyance System	
	3.2	Impoundment	
	3.3	Bypass Reach	
	3.4	Generating Equipment	
	3.5	Transmission Facilities	
	3.6	Ancillary Equipment	
4.0	LAND	S OF THE UNITED STATES	16

LIST OF TABLES

Table 1	Prospect Development Project Components List
Table 2	Trenton Development Project Components List

LIST OF FIGURES

Figure 1	West Canada Creek Project Location	. 2
Figure 2	Prospect Development Dam and Power Canal Facilities	. 7
Figure 3	Prospect Development Intake and Powerhouse Facilities	. 8
Figure 4	Trenton Development Dam and Intake Facilities	14
Figure 5	Trenton Development Penstock, Surge Tank and Powerhouse Facilities 7	15

1.0 GENERAL PROJECT DESCRIPTION

Erie Boulevard Hydropower, L.P. (Erie or Licensee), a Brookfield Renewable company, is the Licensee, owner and operator of the West Canada Creek Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC or Commission) Project No. 2701. The West Canada Creek Project consists of two developments, Prospect and Trenton, located on West Canada Creek in Oneida and Herkimer counties, New York. The upstream Prospect Development is located approximately 33 river miles (RM) from the confluence of West Canada Creek with the Mohawk River. The downstream Trenton Development is located approximately 31 river miles from the confluence of West Canada Creek with the Mohawk River. Figure 1 provides the general location of the Project facilities. A map of the Project boundary is provided in Exhibit G.

The Prospect Development is composed of: a 176-acre impoundment; a concrete overflow dam with earthfill dikes on either end; a 4,500-foot-long canal extending from a south dike to a concrete intake; a 430-foot-long steel penstock; an approximate 1.3-mile-long bypass reach; a reinforced concrete powerhouse containing a single turbine generator unit with a nameplate capacity of 17.3 MW; 6.9 kilovolts (kV) generator leads, 15-kV breaker, 6.6/46-kV transformer, a 46-kV switch connecting to the National Grid interconnection point within the substation; and appurtenant facilities.

The Trenton Development is composed of: a 9 acre impoundment; a concrete masonry dam with a spillway, non-overflow sections, and auxiliary spillway; a concrete intake and a 14-foot-diameter tunnel/pipeline; a surge tank; four 7-foot-diameter penstocks; an approximate 3,703-foot-long bypass reach; two adjoining powerhouses housing retired in-place (Unit Nos. 1, 2, 3, and 4) and operational Unit Nos. 5, 6, and 7 with a total rated capacity of 22.5 MW; 13.2-kV generator leads, three 15-kV breakers, two 13.2/46-kV transformers, two 46-kV switches connecting to the National Grid interconnection point within the substation; and appurtenant facilities.



West Canada Creek Project Location

West Canada Creek Project Location Figure 1

2.0 PROSPECT DEVELOPMENT

2.1 **Project Structures**

2.1.1 Dam

The Prospect dam includes a main spillway, a north dike, and south dike. The main spillway is a concrete overflow 306-foot-long by 45-foot-high spillway controlled by three 27-foot-wide Tainter gates and seven 27-foot-wide needle beam bays. Each gate and bay is separated by a 4-foot concrete pier. There are two 42-inch pipes in the dam that were installed during dam construction with reservation for future water main connectors by the City of Utica now the Mohawk Valley Water Authority (MVWA).¹ The two dikes are earthen embankments with impervious cores. The north dike is 400 feet long by 47 feet high and the south dike is 475 feet long by 47 feet high. The spillway crest is located at an elevation of 1,146.5 feet U.S. Geological Survey (USGS)². The impoundment's normal pool elevation resides at 1,161.5 feet USGS aligning with the top of the Tainter gates.

2.1.2 Intake and Conveyance System

Water is diverted through a 4,500-foot-long by 22-foot-high earthen power canal dike and forebay that extends from the south side of the dam to a concrete intake structure. The forebay is approximately 250 feet long by 65 feet wide. The intake consists of a concrete reinforced structure with a head gate hoist frame and electrical equipment house. The intake is equipped with vertical steel trashracks with 3 5/8-inch clear spacing, a motor operated rack rake, a structural steel gate of the fixed wheel type operated by a 60,000-pound capacity two-drum cable type motor driven hoist, and slots for stop logs. A 430-foot-long by 13.5-foot-diameter steel penstock conveys water from the intake to the Prospect powerhouse.

2.2 Impoundment

The Prospect impoundment has a normal maximum surface area of 176 acres (with 161.7 acres in the main impoundment and 13.8 acres in the forebay) at a normal maximum surface elevation of 1,161.5 feet USGS. At normal maximum surface elevation, the

¹ The MVWA is currently in the process of upgrading the existing water pipe transfer system associated with the withdrawals from Hinckley Reservoir. This project does not currently include connection to the pipes in the Prospect dam or withdraw from the Prospect impoundment.

² All elevations refer to USGS mean sea level datum (National Geodetic Vertical Datum or NGVD).

impoundment has a gross storage capacity of 3,250 acre-feet and a useable storage capacity of 803 acre-feet.

2.3 Bypass Reach

The Prospect bypass reach extends approximately 1.3 miles between the Prospect dam and the Prospect Powerhouse. The Prospect bypass reach is a narrow gorge with steep side slopes of rock outcrops and dispersed vegetation, and bordered along the top elevation with primarily forested vegetation. The Prospect canal extends to the east and the Mohawk Valley Water Authority (MVWA) Water Treatment Plant is located to the west of the bypass reach. Access to the bypass reach is restricted due to the steep terrain and for public safety reasons.

2.4 Generating Equipment

The Prospect Powerhouse, built in 1959, is located on the east bank of West Canada Creek. The Prospect Powerhouse is made of reinforced concrete and is approximately 62 feet wide by 76 feet long. From the equipment floor, the powerhouse is approximately 52 feet high with a substructure that is approximately 37 feet in depth. The Prospect Powerhouse contains one 17,325 (kilowatt) kW vertical shaft turbine with a Francis runner. The turbine has a design capacity of 23,700 horsepower (hp), a design head of 135 feet, a minimum safe operating limit of 4 MW at a hydraulic capacity of 525 cubic feet per second (cfs) and a maximum hydraulic capacity of 1,855 cfs. The governing equipment is a Woodward cabinet actuator type with 80,500-foot-pounds capacity, arranged to operate the wicket gates by means of two servomotors in the turbine pit.

The Prospect Powerhouse contains one direct connected vertical alternating current (A.C.) synchronous generator with a direct connected exciter. The generator is rated at 19,250 kilovolt amps (kVA), 0.9 power factor 17,325 kW, 180 revolutions per minute (rpm), 6,900 volts, 3-phase, 60-cycle. The exciter is shunt wound, self-excited, and is designated to operate in conjunction with a rotating amplifier type voltage regulator. The Prospect tailrace discharges directly into West Canada Creek (Trenton impoundment).

2.5 Transmission Facilities

The Prospect Development has a substation that adjoins the powerhouse. From the powerhouse the 6.9 kV generator leads go underground to the substation. The Licensee owns a 15-kV breaker, a 6.6/46-kV transformer, and a 46-kV switch connecting to the

National Grid interconnection point within the substation. Exhibit H, Appendix H-1, contains the single-line diagram for the Prospect Development, which is being filed as Critical Energy/Electric Infrastructure Information (CEII).

2.6 Ancillary Equipment

Prospect Development has one, four-motor electric overhead traveling bridge crane rated at 60-tons capacity with an allowable overload capacity of 25 percent. The crane is equipped with a 10-ton auxiliary hoist. The Prospect Powerhouse additionally contains a 15-kV breaker, the station control battery with automatic charger, the recorders and transmitters, and all electrical and mechanical parts to operate the station.

See Table 1 for Prospect Development project components summary table. See Figures 2 and 3 for location of project facilities.

Prospect Development	
Prospect Development Capacity	17.3 MW
Prospect Dam River Mile	33
Impoundment	
Normal Surface Area	176 acres
Normal Surface Elevation	1,161.5 feet USGS
Useable Storage Capacity	803 acre-feet
Gross Storage Capacity	3,250 acre-feet
Dam	
Layout	Concrete overflow dam with earthfill dikes on either end
Overflow Dam Dimensions	306 feet long by 45 feet high
North Dike Dimensions	400 feet long by 47 feet high
South Dike Dimensions	475 feet long by 47 feet high
Spillway Crest Elevation	1,146.5 feet USGS
Intake	
Power Canal Dimensions	4,500 feet long by 22 feet high
Forebay Dimensions	250 feet long by 65 feet wide
Intake Construction	Reinforced concrete with vertical steel racks
Water Conduits	
Penstock	430 feet long by 13.5 feet diameter
Bypass Reach	Approximately 1.3 miles long
Powerhouse	
Year Built	1959
Construction Type	Reinforced concrete
Dimensions	62 feet wide by 76 feet long by 52 feet high

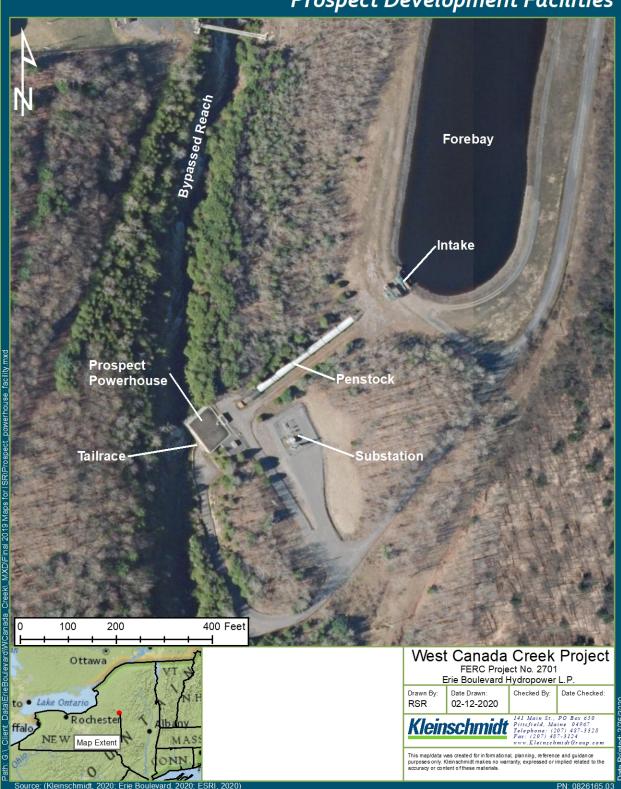
 Table 1
 Prospect Development Project Components List

Prospect Development	
Turbines	
Number	1
Туре	Vertical shaft with Francis runner
Rating	17,325 kw
Turbine Design Capacity	23,700 HP
Maximum Hydraulic Capacity	1,855 cfs
Minimum Hydraulic Capacity	525 cfs
Turbine Design Head	135 feet
Switchyard/Transmission Lines	
	The Prospect Development has a substation that adjoins the powerhouse. From the powerhouse the 6.9 kV generator leads go underground to the substation. The Licensee owns a 15-kV breaker, a 6.6/46-kV transformer, and a 46-kV switch connecting to the National Grid interconnection point within the substation.
Appurtenances	
	The Prospect Development has one, four motor electric overhead traveling bridge crane rated at 60-ton capacity with an allowable overload capacity of 25 percent. The crane is equipped with a 10-ton auxiliary hoist.



Prospect Development Facilities

Prospect Development Dam and Power Canal Facilities Figure 2



Prospect Development Facilities

Figure 3 Prospect Development Intake and Powerhouse Facilities

3.0 TRENTON DEVELOPMENT

3.1 **Project Structures**

3.1.1 Dam

The Trenton dam is a 288-foot-long by approximately 61-foot-high concrete and masonry dam consisting of a main spillway with non-overflow sections on either side and an auxiliary spillway. The main spillway section is approximately 100 feet long by 56 feet high with a crest elevation of 1,017.9 feet USGS surmounted by 6-foot-high trippable wooden flashboards and a 10-foot-high by 15-foot-wide sluice gate. A rock island separates the auxiliary spillway and the east non-overflow section. The west non-overflow section is 106 feet long, 65 feet high, with a crest elevation of 1,026.6 feet USGS. The east non-overflow section is 82 feet long, 56 feet high, with a crest elevation of 1,024.6 feet USGS. The auxiliary spillway is 160 feet long, 6.5 feet high, with a crest elevation of 1,016.2 feet USGS, and is surmounted by 7.5 foot a pneumatic flashboard system with a crest elevation of 1023.9 feet USGS when fully inflated. The impoundment's normal pool elevation resides at 1,023.9 feet USGS which aligns with the top of the main spillway's 6-foot-high flashboards.

3.1.2 Intake and Conveyance System

The Trenton intake resides on the west side of the impoundment and approximately 100 feet upstream of the dam. The intake is 20 feet wide and contains a 20-foot-high by 14-foot-wide vertical lift gate protected by a single set of trashracks with 2-inch clear spacing (upstream of the gate). The gate opens into a 14-foot-diameter concrete-lined tunnel excavated in bedrock. There are valve houses downstream of the right non-overflow structure that contain valves which formerly controlled flow to the original steel pipeline from the eight low level conduits discussed above. The valves remain in place within these buildings in a closed position.

From the intake, a concrete lined 14-foot-diameter tunnel, approximately 1,284 feet long, connects to a 14-foot-diameter steel pipeline. The 14-foot-diameter steel pipeline reduces to a 12-foot-diameter steel pipeline that extends to a surge tank. The total pipeline length is approximately 2,000 feet. A 12-foot-diameter penstock extends from the surge tank and branches off into three 7-foot-diameter penstocks that lead to the newer powerhouse (Powerhouse No. 2). A 7-foot-diameter penstock also branches off

from the 12-foot-diameter steel pipeline, but ahead of the surge tank, and leads to the older powerhouse (Powerhouse No. 1). Powerhouse No. 1 was retired in-place in 1989.

3.2 Impoundment

The Trenton impoundment has a normal maximum surface area of 9-acres at a normal maximum surface elevation of 1,023.9 feet USGS. At normal maximum surface elevation, the impoundment has a gross storage capacity of 264 acre-feet and a useable storage capacity of 155 acre-feet.

3.3 Bypass Reach

The Trenton bypass reach extends approximately 3,703 feet (0.7 miles) between the Trenton Dam and Powerhouse. The bypass reach (Trenton Falls Gorge) is a steeply-sloped narrow gorge with a series of waterfalls, dropping approximately 200 feet over the length of the bypass reach. Access to the bypass reach is restricted due to the steep terrain and for public safety reasons. The gorge is bordered along the top elevation with primarily forested vegetation to the east and to the west with vegetation and Project facilities.

3.4 Generating Equipment

The Trenton powerhouse complex is located on the west bank of the West Canada Creek. The original powerhouse, Powerhouse No. 1, was constructed in 1901 and is a steel-framed, native stone building. Powerhouse No. 1 is approximately 120 feet long by 37 feet wide by 60 feet high and houses Unit Nos. 1-4 that were retired in-place in 1989. In 1918 a second powerhouse, Powerhouse No. 2, was built abutting the upstream side of the original powerhouse. Powerhouse No. 2 is a steel-framed concrete building approximately 125 feet long by 37 feet wide by 96 feet high. Powerhouse No. 2 houses active Unit Nos. 5, 6 and 7.

Powerhouse No. 1 contains four turbine units that have been retired in-place. Powerhouse No. 2 contains operational turbine Unit Nos. 5, 6, and 7. Unit No. 5 is rated at 7,395 kW, Unit No. 6 is rated at 7,656 kW and Unit No. 7 is rated at 7,395 kW for a total nameplate rating of 22,446 kW. Each unit has vertical Francis type runners with a design capacity of 12,315 hp, a design head of 265 feet at .75 kW/hp, the resulting kW is 9,236. Each unit has a minimum single unit safe operating limit of 2.5 MW at a hydraulic capacity of 145 cfs and a maximum station hydraulic capacity of 1,425 cfs. The Trenton tailrace discharges directly into West Canada Creek.

Unit Nos. 5, 6, and 7 generators are direct connected vertical A.C. synchronous machines. The Unit No. 5 generator is rated at 8,500 kVA, 0.87 power factor, 7,395 kW 327 rpm, 13,200 volts, 3-phase, 60 hertz (hz). The Unit No. 6 generator is rated at 8,800 kVA, 0.87 power factor, 7,656 kW, 327 rpm, 13,200 volts, 3-phase, 60 hz. The Unit No. 7 generator is rated at 8,500 kVA, 0.87 power factor, 7,395 kW 340 rpm, 13,200 volts, 3-phase, 60 hz. Each generator has a direct connected exciter.

An automated base flow release valve is tied directly to the piping associated with Unit No. 6. The valve bypasses the turbine during forced shutdowns to pass the required 160 cfs base flows at the Trenton Powerhouse.

3.5 Transmission Facilities

The Trenton Powerhouse adjoins a National Grid 46-kV substation. From the powerhouse the 13.2-kV generator leads go overhead to the National Grid substation. The Licensee owns three 15-kV breakers, two 13.2/46-kV transformers, and two 46-kV switches connecting to the National Grid interconnection point within the substation. Exhibit H contains the single-line diagram for the Trenton Development, which is being filed as CEII.

3.6 Ancillary Equipment

Trenton Powerhouse No. 2 is equipped with a 50-ton capacity crane with motor travel and lift. In addition, there is a 10-ton auxiliary crane.

See Table 2 for Trenton Development project components summary table. See Figures 4 and 5 for location of Project facilities.

Table 2	Trenton Development Project Components List
---------	---

Trenton Development		
Trenton Development Capacity	22.446 MW	
Trenton Dam River Mile	31	
Impoundment		
Normal Surface Area	9 Acres	
Normal Surface Elevation	1,023.9 feet USGS	
Useable Storage Capacity	155 acre-feet	
Gross Storage Capacity	264 acre-feet	
Dam		

Trenton Development		
Layout	Concrete masonry dam with a spillway, two non-overflow	
	sections, and an auxiliary spillway	
Main Spillway Dimensions	100 feet long by 61 feet high	
Main Spillway Flashboards	6-foot-high trippable wooden boards	
West Non-Overflow Section	106 feet long by 65 feet high	
East Non-Overflow Section	82 feet long by 56 feet high	
Auxiliary Spillway Dimensions	160 feet long by 6.5 feet high	
Auxiliary Spillway Flashboards	7.5 foot pneumatic flashboard system with a crest elevation of 1023.9 feet when fully inflated	
Main Spillway Crest Elevation	1,017.9 feet USGS	
Intake	1,017.5 1661 0303	
	20 feet wide with a 20 feet high vertical lift gets	
Intake Dimensions	20 feet wide with a 20-foot-high vertical lift gate	
Water Conduits		
Pipeline	A concrete lined 14-foot-diameter tunnel is approximately 1,284 feet long and connects to a 14-foot-diameter steel pipeline. The 14-foot-diameter steel pipeline reduces to a 12- foot-diameter steel pipeline that extends to the surge tank. The total pipeline length is approximately 2,000 feet.	
Penstock	A 12-foot-diameter penstock extends from the surge tank and branches off into three 7-foot-diameter penstocks that lead to Powerhouse No. 2. A 7-foot diameter penstock branches off from the 12-foot diameter steel pipeline ahead of the surge tank and leads to the older Powerhouse No. 1. Powerhouse No. 1 was retired in place in 1989.	
Bypass Reach	Approximately 3,703 feet (0.7 mile) long	
Powerhouse No. 1 (retired in p	lace)	
Year Built	1901	
Construction Type	steel-framed, native stone	
Dimensions	120 feet long by 37 feet wide by 60 feet high	
Powerhouse No. 2		
Year Built	1918	
Construction Type	Steel-framed, concrete building	
Dimensions	125 feet long by 37 feet wide by 96 feet high	
Turbines		
Number	Unit Nos. 1,2,3,4 = retired in place; Unit Nos. 5,6,7 = active	
Туре	Francis Type Runners	
Rating	Unit No. 5 = 7,395 kw; Unit No. 6 = 7,656 kw; Unit No. 7 = 7,395 kw	
Turbine Design Capacity	12,315 HP	
Maximum Hydraulic Capacity	1,425 cfs (combined units)	

Trenton Development		
Minimum Hydraulic Capacity	145 cfs (individual unit)	
Turbine Design Head	255 feet	
Switchyard/Transmission Lines		
	The Trenton Powerhouse adjoins a National Grid 46-kV substation. From the powerhouse the 13.2-kV generator leads go overhead to the National Grid substation. The Licensee owns three 15-kV breakers, two 13.2/46-kV transformers, and two 46-kV switches connecting to the National Grid interconnection point within the substation.	
Appurtenances		
	The Trenton Powerhouse No. 2 is equipped with a 50-ton capacity crane with motor travel and lift. In addition, there is a 10-ton auxiliary.	

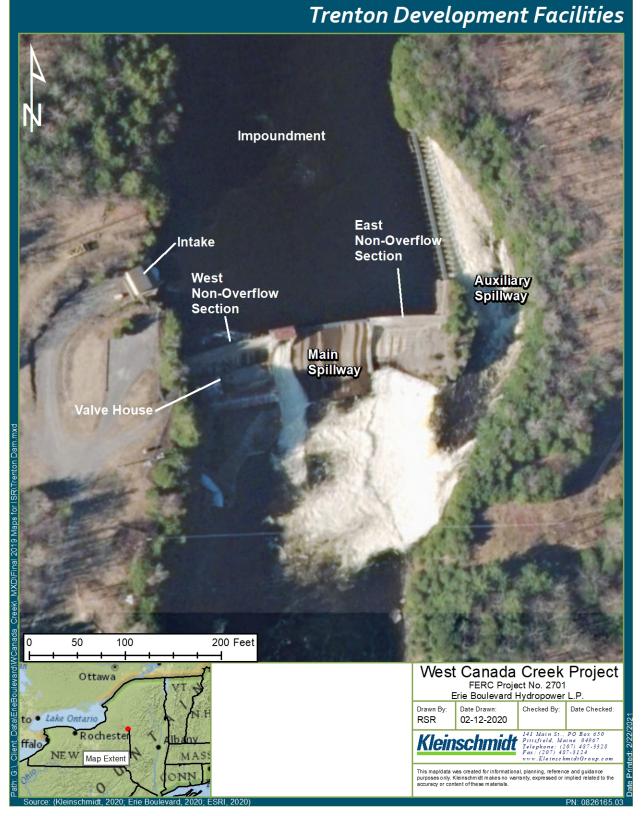


Figure 4 Trenton Development Dam and Intake Facilities

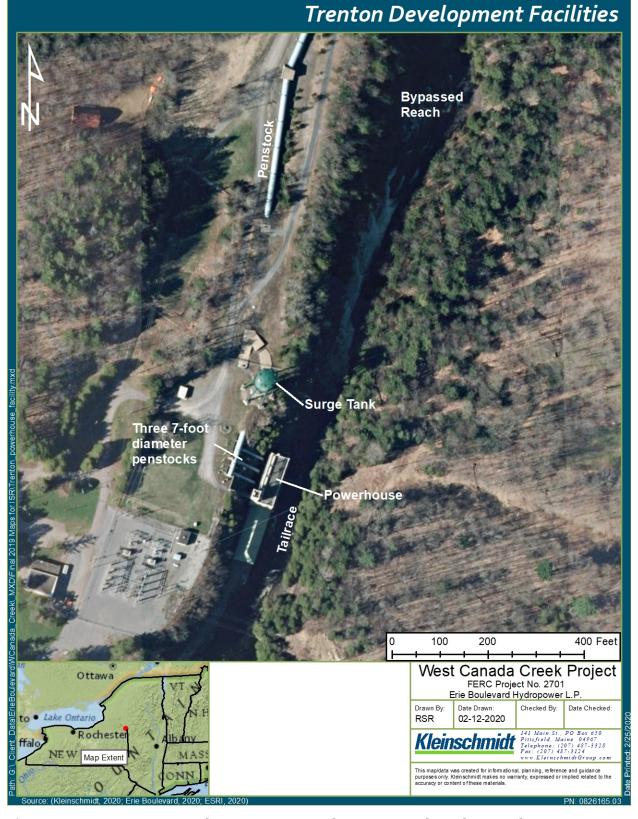


Figure 5 Trenton Development Penstock, Surge Tank and Powerhouse Facilities

4.0 LANDS OF THE UNITED STATES

There are no lands of the United States within the West Canada Creek Project boundary.

WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

Ехнівіт В

PROJECT OPERATION AND RESOURCE UTILIZATION

TABLE OF CONTENTS

1.0	PROJE	CT OPERATION	1				
	1.1	Project Operational Control	1				
	1.2	Annual Plant Factor					
	1.3	Existing Project Operation	2				
		1.3.1 General Project Operation					
		1.3.2 Normal Project Operation					
		1.3.3 Project Operation During Low Flows					
		1.3.4 Project Operation During High Flows	5				
	1.4	Proposed Project Operation					
2.0		ATED ENERGY PRODUCTIONS AND DEPENDABLE CAPACITY					
	2.1	Project Hydrology	6				
	1.1	Average Annual Energy Generation and Dependable Capacity	8				
	1.2	Area-Capacity Curves	12				
	1.3	Estimated Hydraulic Capacity	13				
	1.4	Tailwater Rating Curves	14				
	1.5	Power Plant Capability vs. Head					
3.0	UTILIZ	ATION OF PROJECT POWER	16				
4.0	PLANS FOR FUTURE DEVELOPMENT						
5.0	REFERENCES						

LIST OF TABLES

Table 1	Hinckley Reservoir Daily Outflow (cfs) (Period July 2001 - December 2019).
Table 2	Prospect Development Monthly Average Flows (cfs) (Period 1999-2019)7
Table 3	Trenton Development Monthly Average Flows (cfs) (Period 1999-2019)8
Table 4	Historical Gross Monthly Generation (MWh) at the Prospect Development
	2011 - 2019
Table 5	Historical Gross Monthly Generation (MWh) at the Trenton Development
	2011 - 2019
Table 6	Historical Gross Monthly Generation (MWh) at the West Canada Creek
	Project 2011 - 2019
Table 7	West Canada Creek Project Hydraulic Capacity

LIST OF FIGURES

Figure 1	Prospect Development Area Capacity Curve	.12
Figure 2	Trenton Development Area Capacity Curve	.13
Figure 3	Prospect Development Tailwater Rating Curves	.14
Figure 4	Trenton Development Tailwater Rating Curves	.14
Figure 5	Prospect Development Estimated Plant Capability vs Head	.15
Figure 6	Trenton Development Estimated Plant Capability vs Head	. 15

APPENDICES

Appendix B-1	ANNUAL AND MONTHLY FLOW DURATION CURVES
--------------	---

1.0 PROJECT OPERATION

1.1 **Project Operational Control**

Erie Boulevard Hydropower, L.P. (Erie or Licensee), typically operates the West Canada Creek Hydroelectric Project (FERC No. 2701) (Project) so that daily average inflows from the upstream Hinckley Reservoir into the Project are released from the Prospect and Trenton Developments that same day to maintain daily average outflows (i.e., daily average inflows equal daily average outflows). The two developments are typically operated in tandem such that outflow from Prospect Development is followed by similar outflow at the downstream Trenton Development.

The Prospect Development operates in manual or semi-automatic mode. Erie has the ability to remotely start and stop the Prospect unit and remotely operate the three Tainter gates. A traveling operator is on-site during weekdays, visiting the site once or twice daily. Additional personnel are sent to the site on an as-needed basis (e.g., for maintenance reasons). The Prospect Development has been automated for remote operation from Erie's North America System Control Center in Marlborough, Massachusetts, which is manned around the clock.

The Trenton Development operates in manual or semi-automatic mode. The generating units are controlled and monitored from Erie's North America System Control Center in Marlborough, Massachusetts. Instrumentation is used to monitor headwater levels at Trenton. At the Trenton Development, Erie can remotely operate the flood gate and vary the generating units down to motoring. Unit No. 7 also has remote start/stop capability. A travelling operator is on-site during weekdays, visiting the site once or twice daily.

1.2 Annual Plant Factor

The average annual plant factor is determined using the following equation:

<u>Average Annual Output</u> = Avg. Annual Plant Factor Licensed Capacity x 8,760 hrs/yr

The Prospect Development currently has a gross average annual energy production of approximately 77,161 megawatt-hours (MWh) per year during the period 2011-2019, and an annual plant factor of approximately 50.9 percent based on its current FERC authorized capacity of 17.3 MW.

The Trenton Development currently has a gross average annual energy production of approximately 146,883 megawatt-hours (MWh) per year during the period 2011-2019, and an annual plant factor of approximately 74.5 percent based on its current FERC authorized capacity of 22.5 MW.

1.3 Existing Project Operation

1.3.1 General Project Operation

Inflow to the West Canada Creek Project is supplied from the upstream Hinckley Reservoir outflows. Hinckley Reservoir is operated by the New York State Canal Corporation (NYSCC) in accordance with the 2012 Hinckley Reservoir Operating Diagram (NYPA 2020) and governed by legally binding operating agreements¹ between the NYSCC, the Mohawk Valley Water Authority (MVWA), and Erie. The Jarvis Hydroelectric Project (FERC No. 3211) utilizes the Hinckley Reservoir releases to generate power. Outflows from Hinckley Reservoir and the Jarvis Project discharge directly into the Prospect Reservoir.

The current FERC license for the Jarvis Project allows for peaking operations and requires the New York Power Authority (NYPA) (as licensee for the Jarvis Project) to coordinate with Erie (as licensee for the West Canada Creek Project) and the NYSCC to maintain a continuous base flow of 160 cfs in West Canada Creek, as measured immediately downstream of the NYSCC diversion weir (Nine Mile Creek Feeder Dam). When conducting peaking operations, the NYPA will average the outflow required by the 2012 Operating Diagram over the course of a 24-hour day. The Jarvis Project will, therefore, generate with a lower outflow during non-peak demand periods and then generate with a higher outflow during peak demand periods, so that the total daily average flow is equal to the required outflow.

The NYPA Hydrologist communicates with the Erie Water Resource Manager twice weekly to discuss the application of the 2012 Operating Diagram based upon reservoir elevation in relation to the rule curve. The West Canada Creek Project is typically operated so that daily average inflows from Hinckley Reservoir (as controlled by the NYSCC and the NYPA based upon the 2012 Operating Diagram) into the West Canada Creek Project are released from the Prospect and Trenton developments that same day to maintain daily

¹ The 2012 Operating Diagram was accepted and became effective in 2013 by an agreement by NYSCC and MVWA dated February 1, 2013, and an agreement by NYSCC and Erie dated January 13, 2015.

average outflows (i.e., daily average inflows equal daily average outflows). The two developments are typically operated in tandem such that outflow from Prospect Development is followed by similar outflow at the downstream Trenton Development.

The current FERC license (Article 33) for the West Canada Creek Project requires Erie, as licensee, to provide a continuous base flow release of 160 cfs or inflow from the Hinckley Reservoir (whichever is less) for fisheries and aquatic habitat immediately downstream of the NYSCC diversion weir (Nine Mile Creek Feeder Dam).² To maintain the required 160 cfs base flow below the NYSCC diversion weir, Erie coordinates with NYSCC and continuously monitors the flow amount diverted into the Nine Mile Feeder Canal by the NYSCC. Essentially, when the diversion amount is communicated to Erie by the NYSCC, Erie will factor this amount into their base flow requirement by adding that value to the 160 cfs base flow. This new value will determine the total amount of flow needed to be passed through the Trenton Development continuously to meet the base flow requirements for the West Canada Creek. (For example, if 40 cfs is being diverted through the Nine Mile Feeder Canal this means that Trenton Development will have to discharge at least 160 cfs + 40 cfs or 200 cfs from Trenton Development instantaneously to meet base flow requirements during that diversion period).

Erie maintains staff gages and electronic instrumentation at the headpond and tailrace areas of each development to allow monitoring and control of Project operation. The NYSCC operates the diversion structure gatehouse (and associated gages) and alerts Erie of changes. Erie provides the required base flow by releasing 160 cfs, or more, via the turbines or at Trenton Dam, depending on NYSCC's operation of the New York State Canal System.

² The New York State canal system navigation season typically runs from mid-May to mid-October (NYSCC 2020a). During the period 2013 to 2019, monthly average NYSCC diversion flows into the Nine Mile Feeder Canal ranged from 0 cfs to 69.6 cfs, with lowest daily average diversion of 0 cfs and highest daily average diversion of 74 cfs during this period (NYSCC 2020b).

1.3.2 Normal Project Operation

PROSPECT DEVELOPMENT

The Prospect Development utilizes its reservoir's limited storage capacity as it operates between reservoir elevations of 1,161.5 feet (normal surface elevation) and 1,156.5 feet. When sufficient flow (within range of 500 cfs to 1,400 cfs) is provided from Hinckley Reservoir discharges upstream, the Prospect Reservoir can fluctuate up to approximately 5 feet daily and typically peaking occurs during the day and refill periods during the evening periods. When inflows are above or below the sufficient flow range (within 500 cfs to 1,400 cfs), the Prospect Development will typically operate as a run-of-river plant. However, when flows are below 500 cfs, Prospect's unit is operating below its optimal efficiency which may cause cavitation. To prevent damage to the unit due to cavitation, the unit may cycle on and off, thus operating in peaking mode. Instrumentation is used to monitor headwater level at Prospect.

TRENTON DEVELOPMENT

The Trenton Development utilizes its reservoir's limited storage capacity as it operates between elevation 1,023.9 (normal surface elevation) and 1,011.9 feet. When sufficient flow (within range of 500 cfs to 1,400 cfs) is provided from upstream, the Trenton Reservoir can fluctuate up to approximately 12 feet daily and typically peaking occurs during the day. When inflows are above or below the sufficient flow range (within range of 500 cfs to 1,400 cfs), the Trenton Development will typically operate as a run-of-river plant. The required 160 cfs base flow is passed either through the Trenton Development generating units or operations at the Trenton Dam. The turbine inlet valves and the base flow valve are electronically controlled by a programmable logic controller (PLC). If the base flow is interrupted by a turbine shutdown, the base flow valve tied to Unit no. 6 at the powerhouse is automated to open a specific amount to allow the passage of the required base flow.

1.3.3 Project Operation During Low Flows

PROSPECT DEVELOPMENT

When sufficient quantities of water are not available to permit the continuous operation of Prospect Development at full capacity, energy production or plant operation is

scheduled as much as possible to meet the load requirements of the interconnected electric system.

TRENTON DEVELOPMENT

When sufficient quantities of water are not available to permit the continuous operation of the development at full capacity, energy production or plant operation is scheduled as much as possible to meet the load requirements of the interconnected electric system. Unit Nos. 5, 6, and 7 operate at efficient load within the limitations of load demand, stream flow available and typically sequenced with the upstream Prospect Development.

1.3.4 Project Operation During High Flows

PROSPECT DEVELOPMENT

During periods of high flow, the Prospect Development is operated continuously at the full plant hydraulic capacity of approximately 1,855 cfs through the turbine and spilling flows in excess of 1,855 cfs. Managing flows beyond turbine capacity is accomplished by operating in a run-of-river mode utilizing any of the three Tainter gates, which have a combined hydraulic capacity of approximately 16,500 cfs at normal pond elevation.

TRENTON DEVELOPMENT

During periods of high flow, the Trenton Development is operated continuously at the full plant hydraulic capacity of approximately 1,425 cfs through the turbines and spilling flows in excess of 1,425 cfs. Managing flows beyond turbine capacity is accomplished by operating in a run-of-river mode by utilizing flood gate (hydraulic capacity of approximately 1,800 cfs at normal pond elevation), pneumatic crest, and trippable flashboards.

1.4 Proposed Project Operation

Erie provides the applicant's proposed measures, including those related to Project operations, in Exhibit E, Section 2.2, *Applicant's Proposed Action*.

2.0 ESTIMATED ENERGY PRODUCTIONS AND DEPENDABLE CAPACITY

2.1 **Project Hydrology**

The West Canada Creek has a total drainage area of approximately 561 square miles. The Trenton Development dam is located at approximate RM 31, and has a drainage area of approximately 376 square miles. The West Canada Creek headwaters originate in Hamilton County, New York and flow approximately 75 miles to its confluence with the Mohawk River.

Inflow to the Project is regulated and from the upstream Hinckley Reservoir which has a usable storage capacity of 75,417 acre-feet at spillway crest elevation of 1,225 feet (NYPA 2020). Inflow to the West Canada Creek Project is provided from Hinckley Reservoir through discharges from the upstream Jarvis Hydroelectric Project (P-3211) or spill over the Hinckley dam. Table 1 provides the mean, maximum, and minimum monthly daily average outflows for Hinckley Reservoir as reported by NYPA in the Jarvis Project Final License Application (NYPA 2020).

Month	Min	Мах	Avg
January	298	6,381	1,088
February	106	2,261	944
March	104	4,449	1,044
April	246	15,820	2,085
May	298	7,912	1,251
June	245	13,062	868
July	178	7,696	697
August	234	2,311	569
September	119	3,744	590
October	120	4,942	829
November	298	16,803	1,176
December	223	4,156	1,068

Table 1Hinckley Reservoir Daily Outflow (cfs)
(Period July 2001 - December 2019)

Source: NYPA 2020

Prospect Development discharges directly into Trenton Development. Trenton Development discharges directly into West Canada Creek. Streamflow data provided for West Canada Creek Project is based on the downstream USGS Gage No. 01346000 at Kast Bridge located on West Canada Creek in Herkimer, New York, for the period of 1999 to 2019. Flow data for the West Canada Creek Project at the Prospect Dam and Trenton Dam are based on prorations of their respective drainage areas.

Table 2 and Table 3 present the mean, maximum, and minimum monthly average outflows for the Prospect Development and Trenton Development, respectively, for the period 1999 to 2019. Prospect Development discharges directly into Trenton Development. Trenton Development discharges directly into West Canada Creek.

The annual and monthly flow duration curves are provided in Appendix B-1. The flow curves were developed based on USGS Gage No. 01346000 (at Kast Bridge) located on West Canada Creek in Herkimer, New York, for the period of 1999 to 2019.

Month	Min	Мах	Avg
January	374	5,993	1,155
February	234	3,860	1,037
March	284	4,462	1,338
April	395	14,003	2,233
May	319	7,909	1,316
June	184	13,786	930
July	205	8,344	723
August	197	2,786	589
September	146	5,819	596
October	126	4,890	952
November	395	12,770	1,233
December	443	4,252	1,233

Table 2Prospect Development Monthly Average Flows (cfs)
(Period 1999-2019)

Source: Prorated from USGS No. 01346000 at Kast Bridge, Herkimer NY, for the period of 1999-2019; prorating factor is 0.726.

Month	Min	Мах	Avg
January	375	6,006	1,158
February	234	3,868	1,039
March	285	4,472	1,341
April	396	1,4033	2,238
May	319	7,925	1,319
June	185	1,3815	932
July	206	8,362	725
August	197	2,792	590
September	146	5,831	597
October	127	4,901	954
November	396	1,2797	1,236
December	444	4,261	1,236

Table 3Trenton Development Monthly Average Flows (cfs)
(Period 1999-2019)

Source: Prorated from USGS No. 01346000 at Kast Bridge, Herkimer NY, for the period of 1999-2019;\ prorating factor is 0.727.

1.1 Average Annual Energy Generation and Dependable Capacity

For the period from 2011 to 2019, the average annual power generated by the Prospect Development is 77,161 megawatt-hours (MWh), by the Trenton Development is 146,883 MWh, and by the total Project (both developments) is 224,044 MWh. Monthly average energy generation for the period 2011 to 2019 is provided in Table 4 for the Prospect Development and Table 5 for the Trenton Development. Total monthly average energy for the entire West Canada Creek Project is provided in Table 6.

The power is sold into the wholesale market administered by the New York Independent System Operator (NYISO). The NYISO calculates the dependable capacity for small hydro projects for two capability periods (summer and winter) (NYISO 2020). The calculation is based on the amount of generation the development produced during the NYISO's 20 peak load hours for each capability period. Each capability period has a five-year rolling average. For the most recent periods, Prospect Development's dependable capacity amount was 6.3 MW for the summer period and 13.1 MW for the winter period, and Trenton Development's dependable capacity amount was 14.2 MW for the summer period and 23.1 MW for the winter period.

Month	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average
January	6,176	8,274	6,172	9,297	9,475	9,190	4,731	7,435	9,499	7,806
February	3,196	8,176	6,337	6,060	3,681	7,584	8,829	8,332	10,213	6,934
March	6,544	8,746	4,130	2,294	967	11,891	12,215	10,662	7,891	7,260
April	11,122	6,178	8,652	9,784	9,381	11,298	12,460	10,433	11,121	10,048
May	11,065	8,088	6,836	12,157	7,234	5,228	8,777	9,342	11,520	8,916
June	5,369	4,631	9,354	6,825	6,928	1,219	6,597	2,780	8,933	5,848
July	3,972	2,650	9,143	5,955	6,731	2,403	6,563	1,756	3,230	4,711
August	2,563	2,015	2,343	4,778	1,096	3,163	4,745	2,069	2,794	2,841
September	6,599	1,489	2,452	5,273	738	3,231	4,051	3,054	4,396	3,476
October	8,086	4,375	2,121	4,950	_	2,988	2,793	6,602	7,950	4,430
November	7,077	5,238	8,505	5,513	5,682	5,674	10,655	9,213	9,679	7,471
December	8,054	4,633	10,543	6,073	6,700	6,417	6,897	8,447	9,018	7,420
Annual Total	79,821	64,494	76,588	78,960	58,613	70,287	89,314	80,125	96,243	77,161

 Table 4
 Historical Gross Monthly Generation (MWh) at the Prospect Development 2011 - 2019

Month	2011	2012	2013	2014	2015	2016	2017	2018	2019	AVERAGE
January	12,136	15,495	12,416	17,436	17,919	11,466	-	14,648	17,179	13,188
February	7,363	15,206	12,466	12,372	8,032	11,967	9,742	15,858	18,571	12,397
March	13,695	15,859	9,818	5,951	3,326	20,631	20,600	18,986	15,116	13,776
April	18,593	12,138	15,418	16,695	16,128	19,941	20,146	17,967	18,714	17,304
Мау	17,689	14,779	13,878	20,400	14,010	10,929	16,092	16,310	20,242	16,037
June	9,784	9,630	16,267	13,238	13,365	5,261	12,729	6,854	16,388	11,502
July	7,614	6,882	15,500	12,395	13,910	6,807	12,607	4,502	8,098	9,813
August	6,950	6,155	6,216	10,409	4,767	7,695	10,381	5,052	6,974	7,178
September	12,023	4,882	6,775	11,082	3,542	7,749	8,874	7,252	9,453	7,959
October	15,138	9,997	5,549	10,759	9,409	7,482	7,260	13,301	14,906	10,422
November	13,580	10,715	15,139	11,994	9,957	11,496	18,913	16,866	14,085	13,638
December	15,107	9,938	18,461	12,571	10,750	9,473	13,843	16,095	16,781	13,669
Annual Total	149,671	131,676	147,903	155,302	125,114	130,895	151,185	153,691	176,506	146,883

 Table 5
 Historical Gross Monthly Generation (MWh) at the Trenton Development 2011 - 2019

Month	2011	2012	2013	2014	2015	2016	2017	2018	2019	AVERAGE
January	18,312	23,769	18,588	26,732	27,394	20,656	4,731	22,083	26,678	20,994
February	10,559	23,382	18,804	18,432	11,713	19,551	18,571	24,190	28,784	19,332
March	20,239	24,605	13,947	8,245	4,293	32,522	32,816	29,648	23,007	21,036
April	29,715	18,315	24,071	26,479	25,509	31,239	32,605	28,400	29,835	27,352
May	28,753	22,867	20,715	32,557	21,245	16,157	24,869	25,652	31,761	24,953
June	15,153	14,261	25,621	20,064	20,293	6,480	19,326	9,634	25,321	17,350
July	11,586	9,532	24,643	18,350	20,641	9,210	19,170	6,258	11,328	14,524
August	9,512	8,170	8,558	15,188	5,863	10,857	15,126	7,121	9,768	10,018
September	18,622	6,371	9,226	16,355	4,280	10,980	12,925	10,306	13,849	11,435
October	23,224	14,372	7,671	15,709	9,409	10,470	10,053	19,903	22,856	14,852
November	20,657	15,953	23,644	17,508	15,639	17,170	29,567	26,079	23,764	21,109
December	23,161	14,571	29,004	18,644	17,451	15,889	20,740	24,543	25,799	21,089
Annual Total	229,493	196,170	224,490	234,262	183,727	201,182	240,499	233,816	272,749	224,044

Table 6Historical Gross Monthly Generation (MWh) at the West Canada Creek Project 2011 - 2019

1.2 Area-Capacity Curves

Figure 1 and Figure 2 provide the area capacity curves for the Prospect and Trenton Developments, respectively.

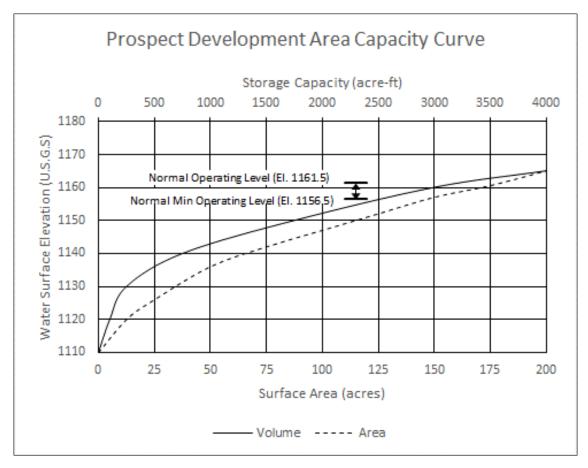


Figure 1 Prospect Development Area Capacity Curve

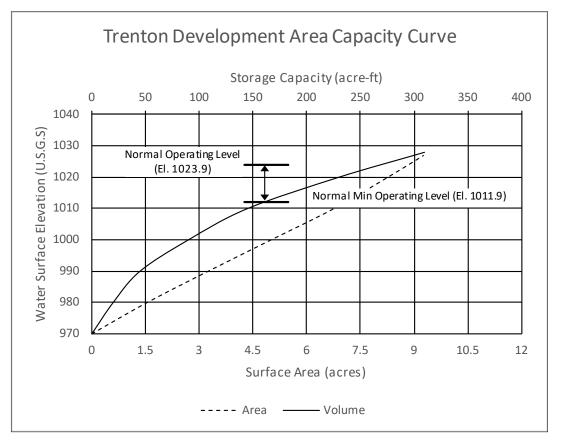


Figure 2 Trenton Development Area Capacity Curve

1.3 Estimated Hydraulic Capacity

Table 7 provides the maximum and minimum hydraulic capacities for the West Canada Creek Project's turbines. Prospect Development has a total maximum hydraulic capacity of 1,855 cfs and Trenton Development has a total maximum hydraulic capacity of 1,425 cfs.

Table 7	West Canada Creek Project Hydraulic Capacity
---------	--

Development/Unit	Minimum Hydraulic Capacity (cfs)	Maximum Hydraulic Capacity (Cfs)
Prospect Powerhouse		
Unit 1	525	1,855
Trenton Powerhouse		
Unit 5	145	475
Unit 6	145	475
Unit 7	145	475
Total	145 (one unit operating)	1,425

1.4 Tailwater Rating Curves

The normal tailwater elevation at the Prospect Development is 1,024 feet msl and at the Trenton Development is 755.5 feet msl. Figure 3 and Figure 4 illustrate the tailwater rating curves for the Prospect and Trenton Developments, respectively.

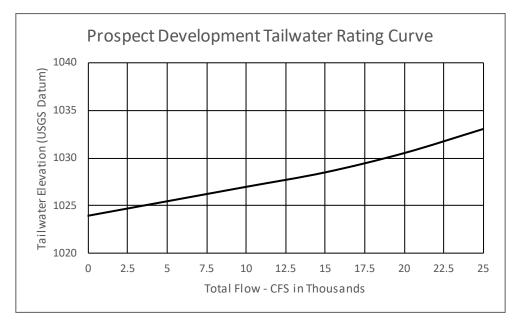


Figure 3 Prospect Development Tailwater Rating Curves

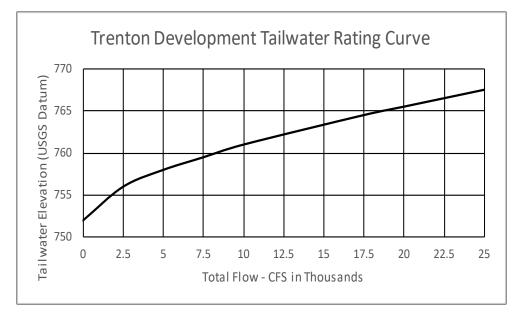


Figure 4 Trenton Development Tailwater Rating Curves

1.5 Power Plant Capability vs. Head

Figure 5 and Figure 6 provide curves of the estimated plant capability as a function of head for the Prospect and Trenton power plants, respectively.

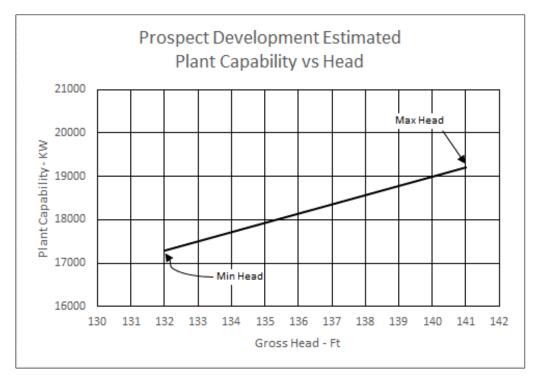
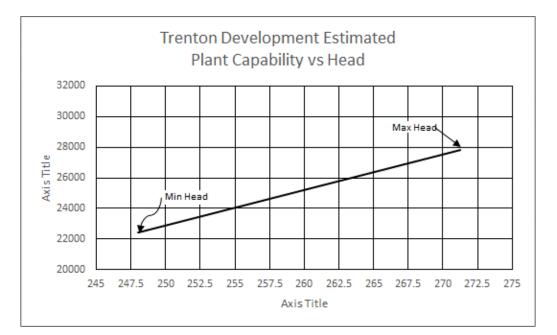


Figure 5 Prospect Development Estimated Plant Capability vs Head





3.0 UTILIZATION OF PROJECT POWER

As a wholesale seller of generated electricity, Erie sells the electricity generated from the West Canada Creek Project as a market participant in the NYISO. The Project is interconnected to the National Grid transmission system.

4.0 PLANS FOR FUTURE DEVELOPMENT

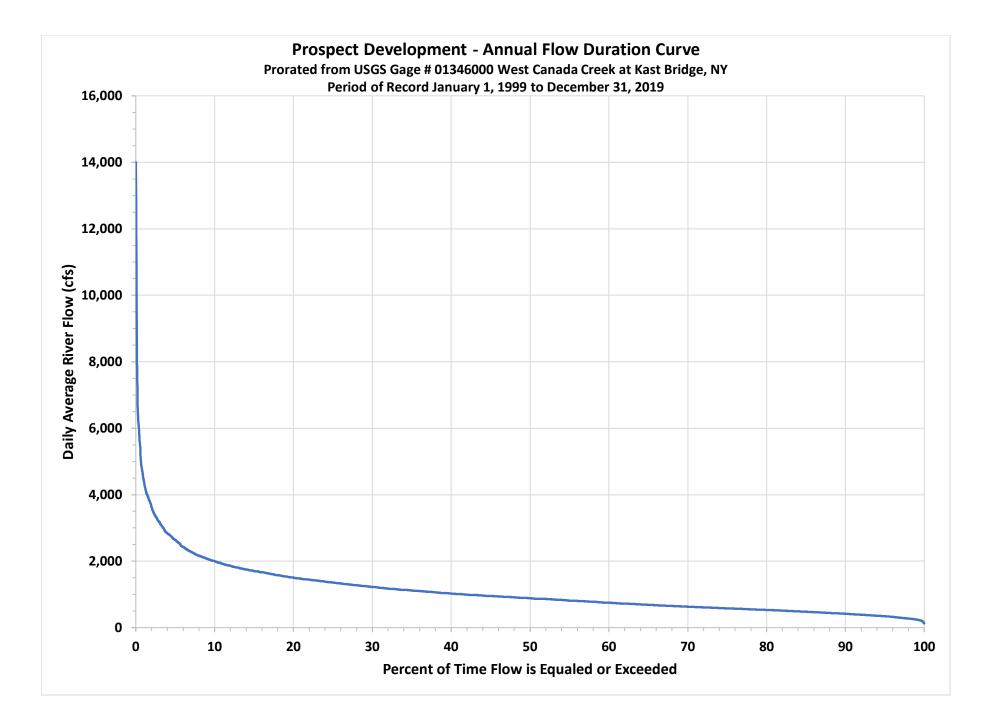
Erie has no future development plans proposed as part of this relicensing proceeding.

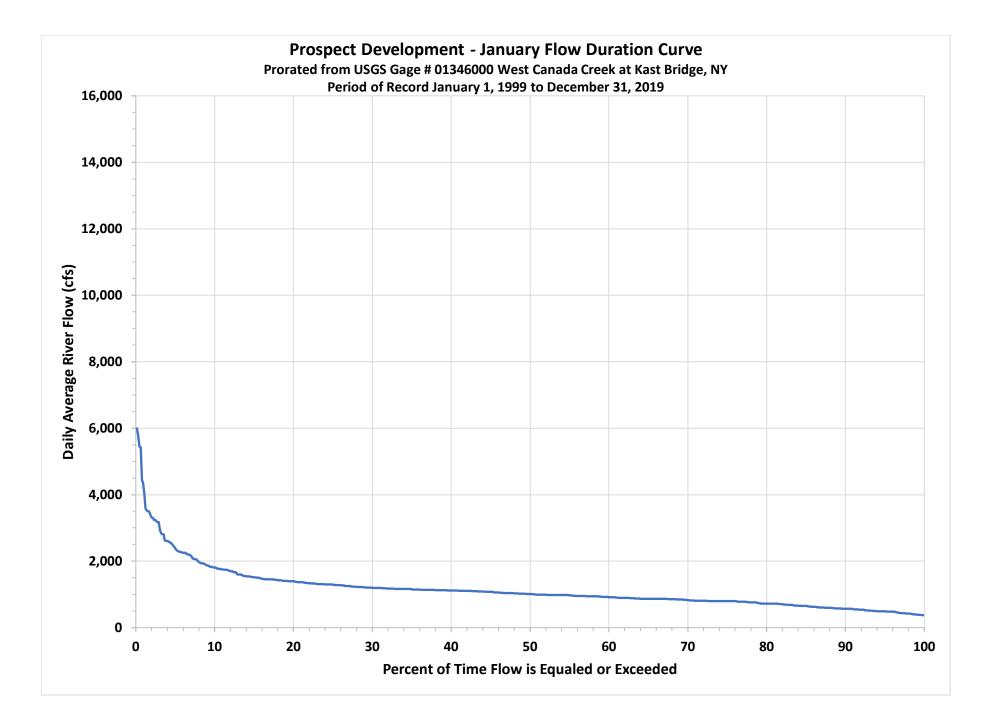
5.0 **REFERENCES**

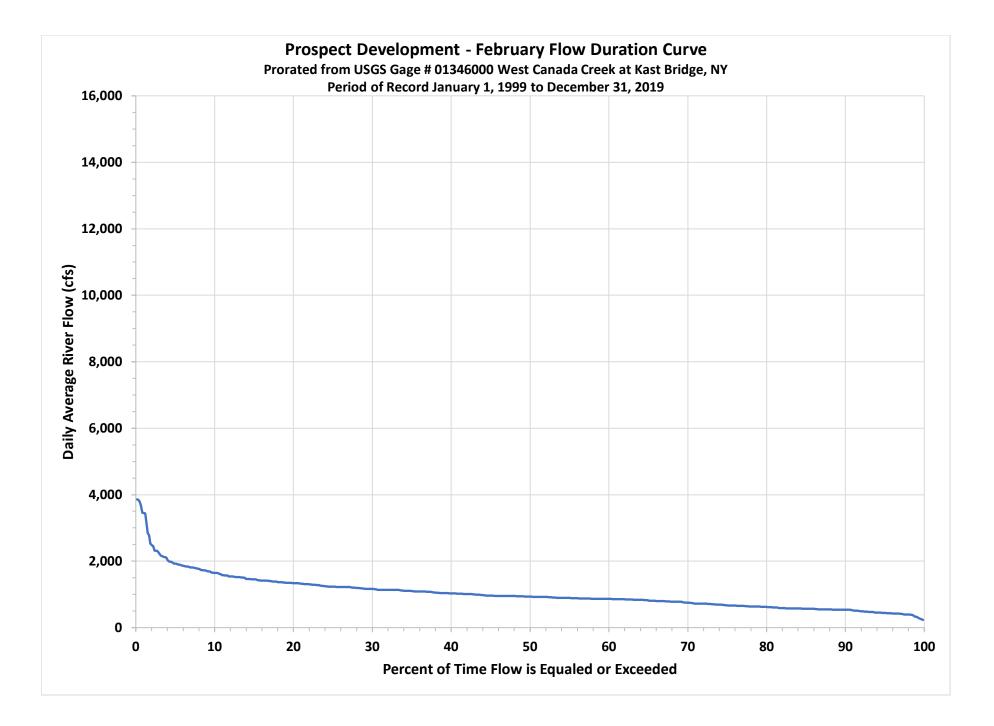
- New York Independent System Operator (NYISO). 2020. Load & Capacity Data Report. Available: <u>https://www.nyiso.com/documents/20142/2226333/2020-Gold-Book-</u> <u>Final-Public.pdf/9ff426ab-e325-28bc-97cf-106d792593a1?t=1588251915775</u>
- New York State Canal Corporation (NYSCC). 2020a. Boating on the Canals. Available: <u>http://www.canals.ny.gov/boating/index.html.</u>
- NYSCC. 2020b. Hinckley Reservoir Water Levels Data. Available: http://www.canals.ny.gov/wwwapps/waterlevels/hinckley/hinckleywaterlevels.aspx
- New York Power Authority (NYPA). 2020. Final License Application, Gregory B. Jarvis Project (P-3211) Relicensing, Exhibit B - Project Operation and Resource Utilization. July 2020.
- Niagara Mohawk Power Corporation (NMPC).1980. Application for License for Major Project, West Canada Creek Hydropower Project (FERC No. 2701).

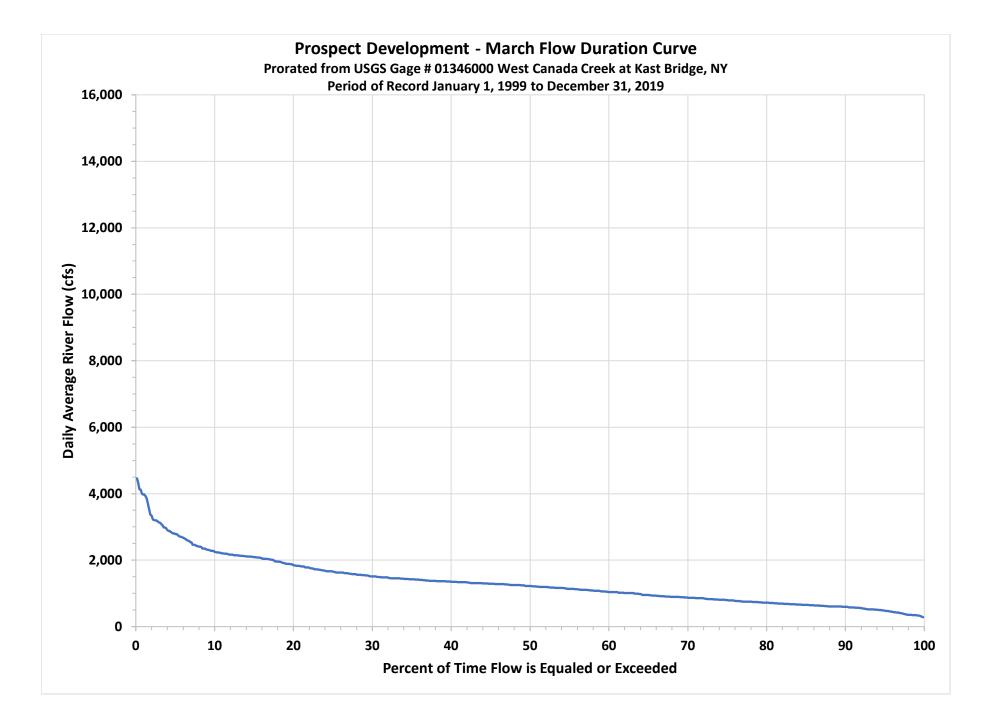
APPENDIX B-1

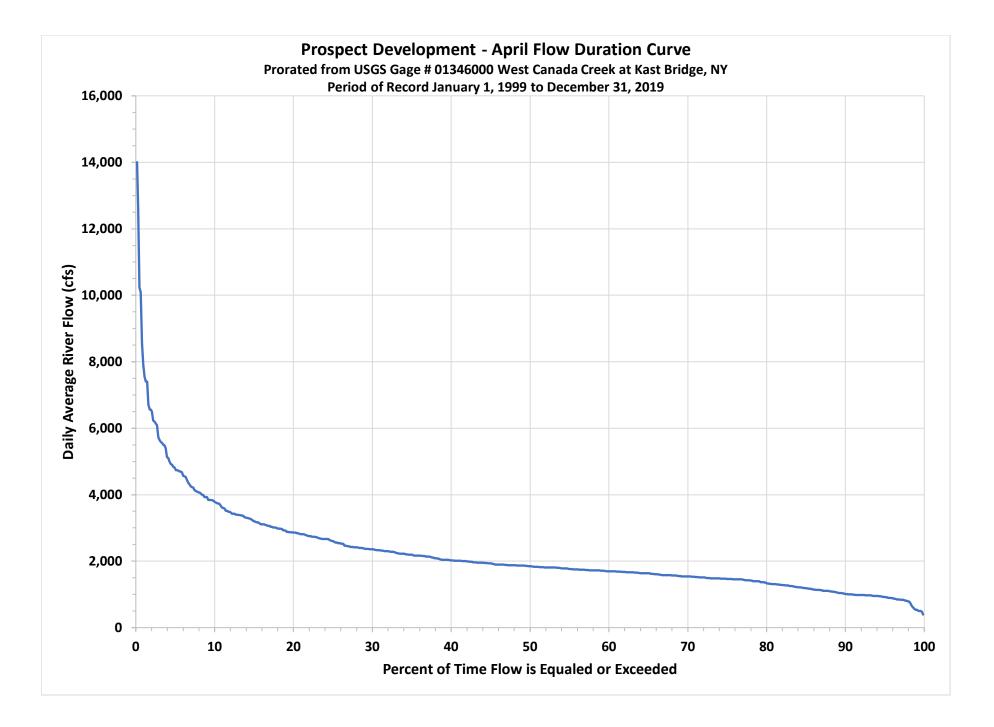
FLOW DURATION CURVES

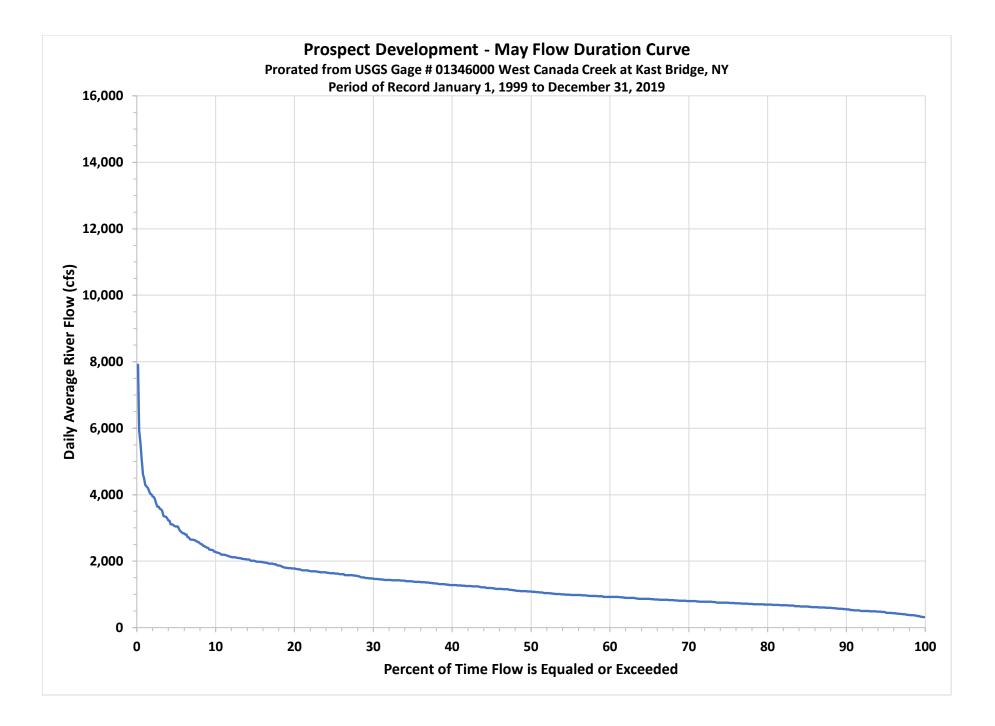


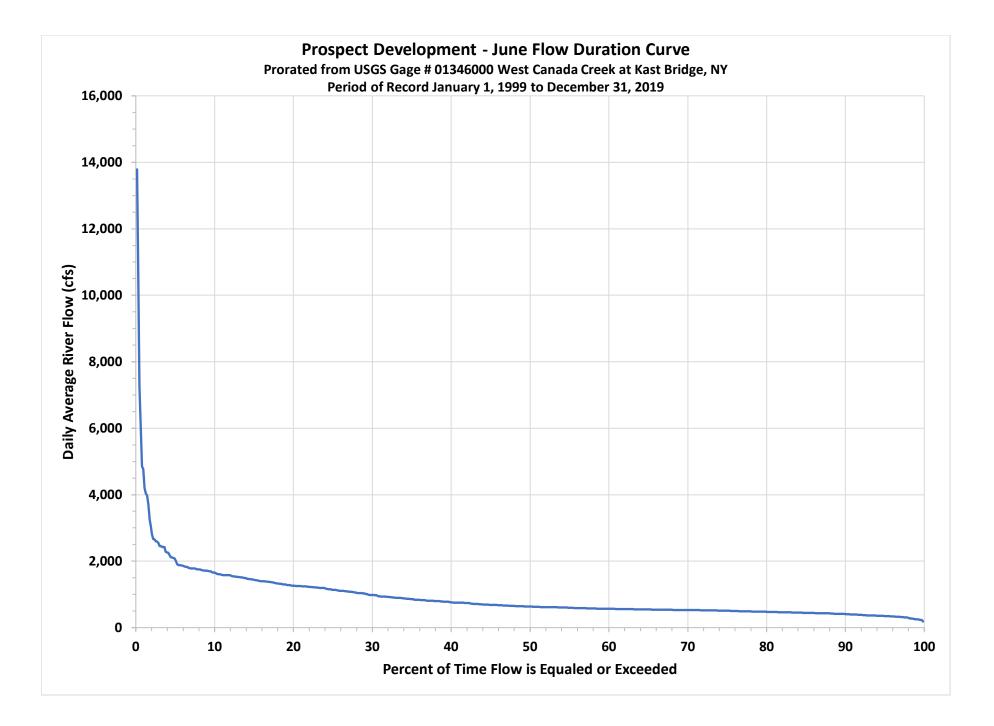


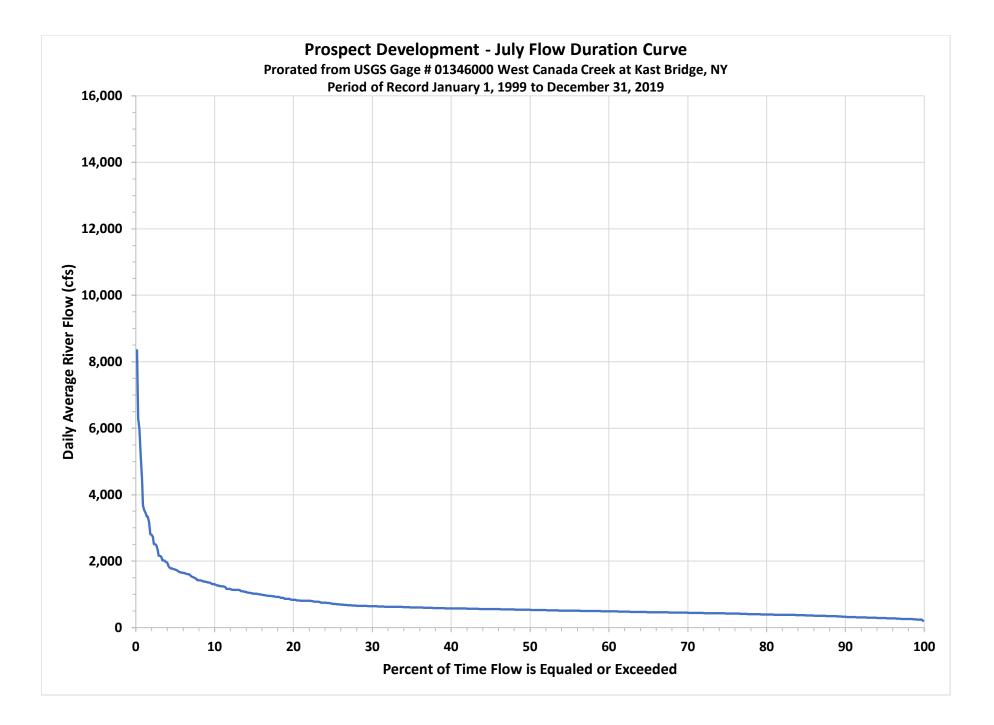


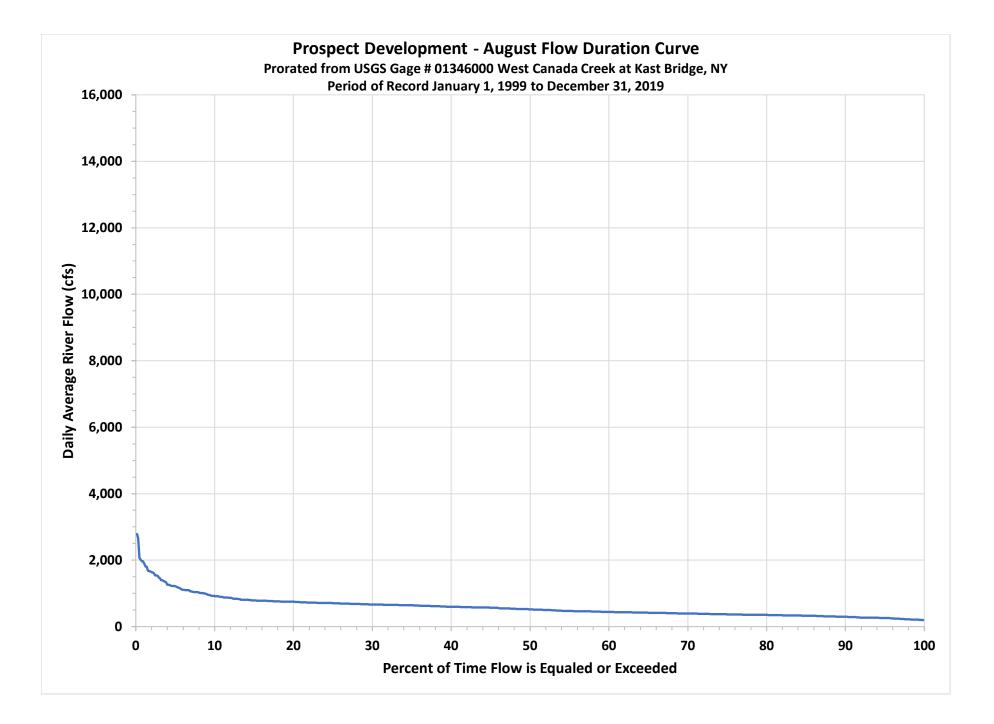


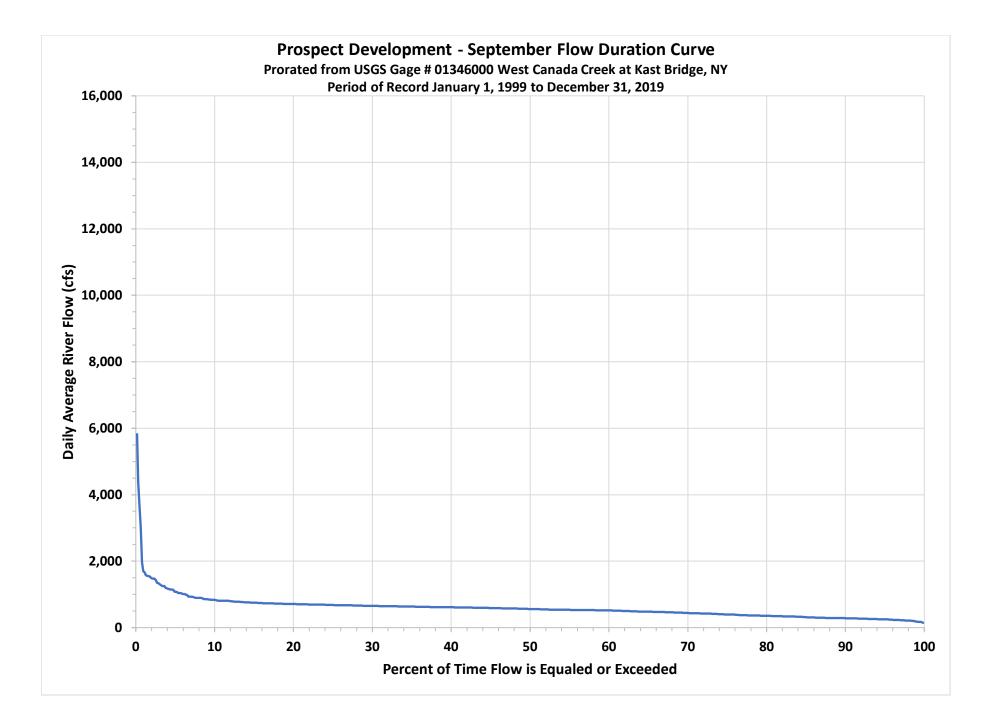


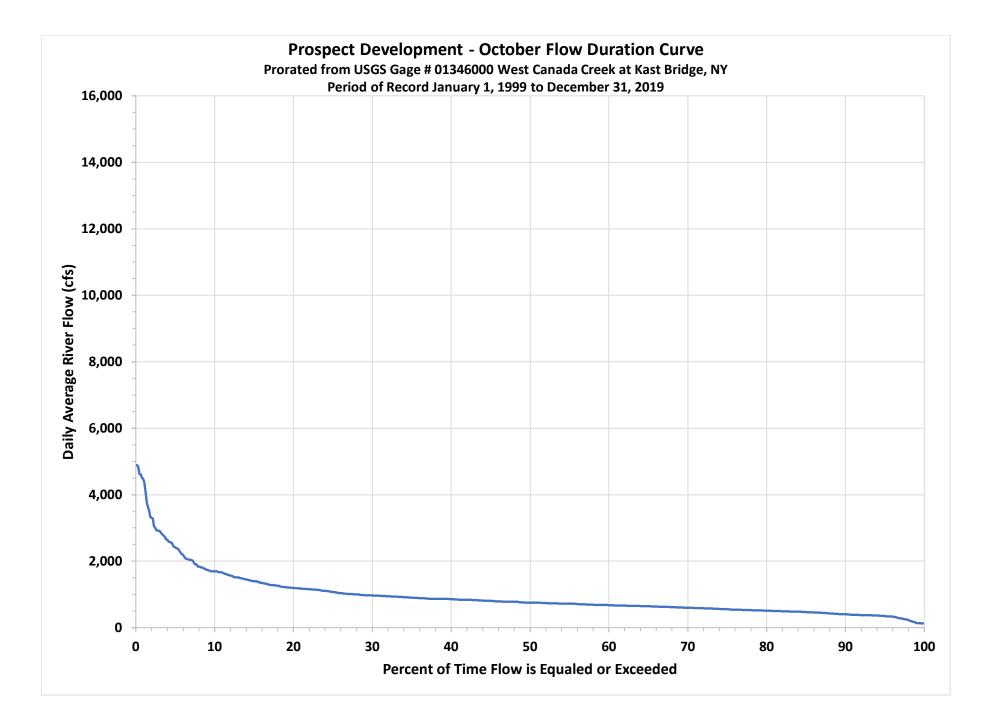


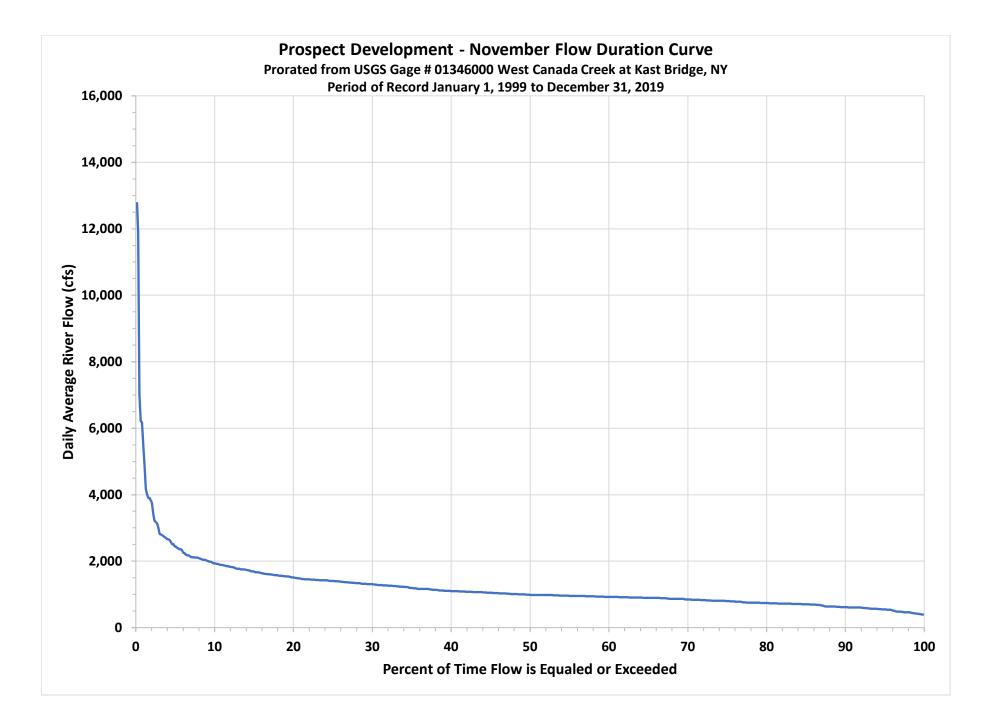


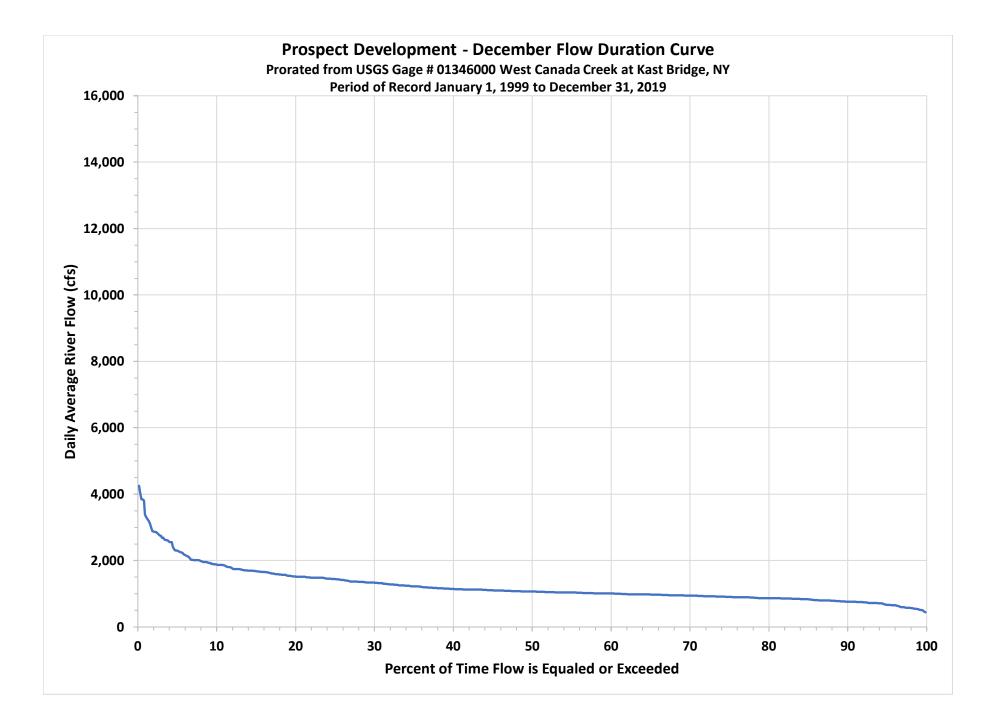


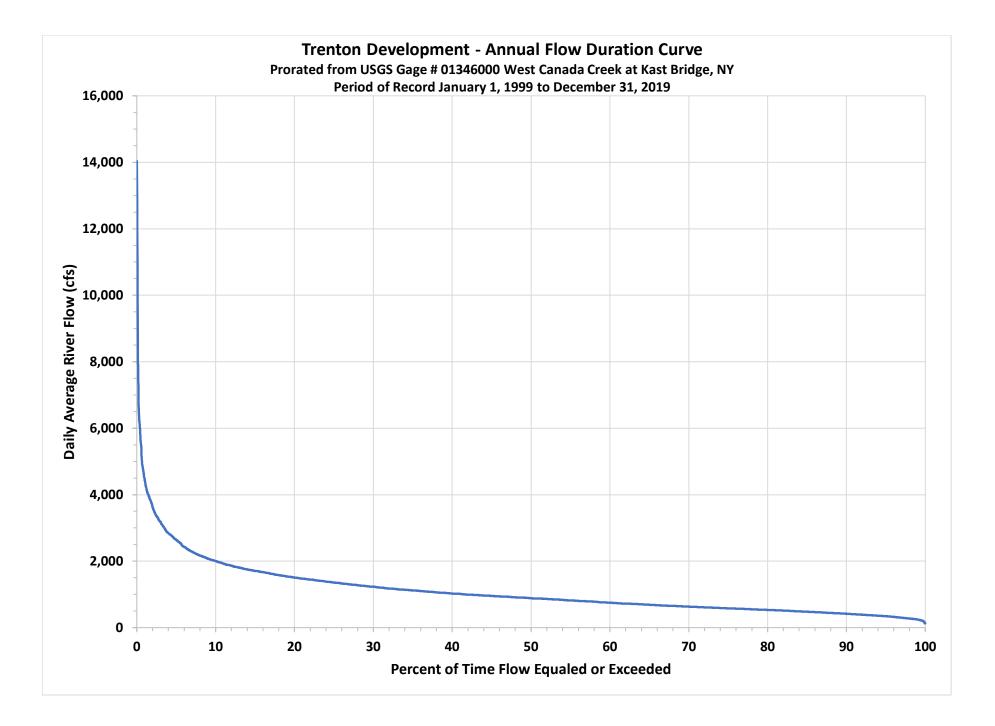


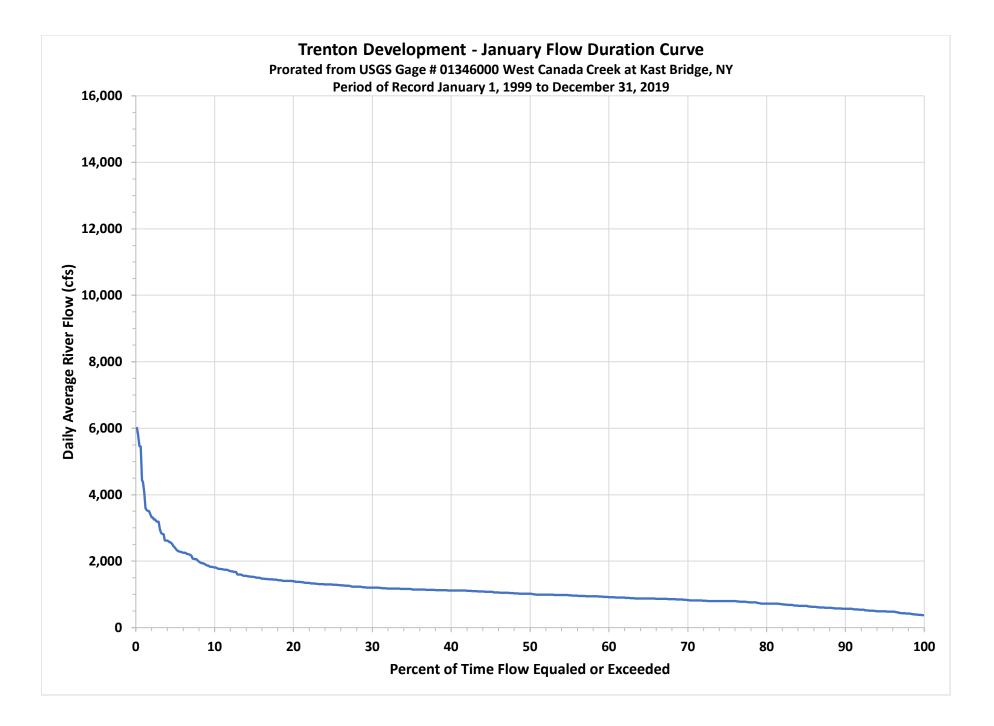


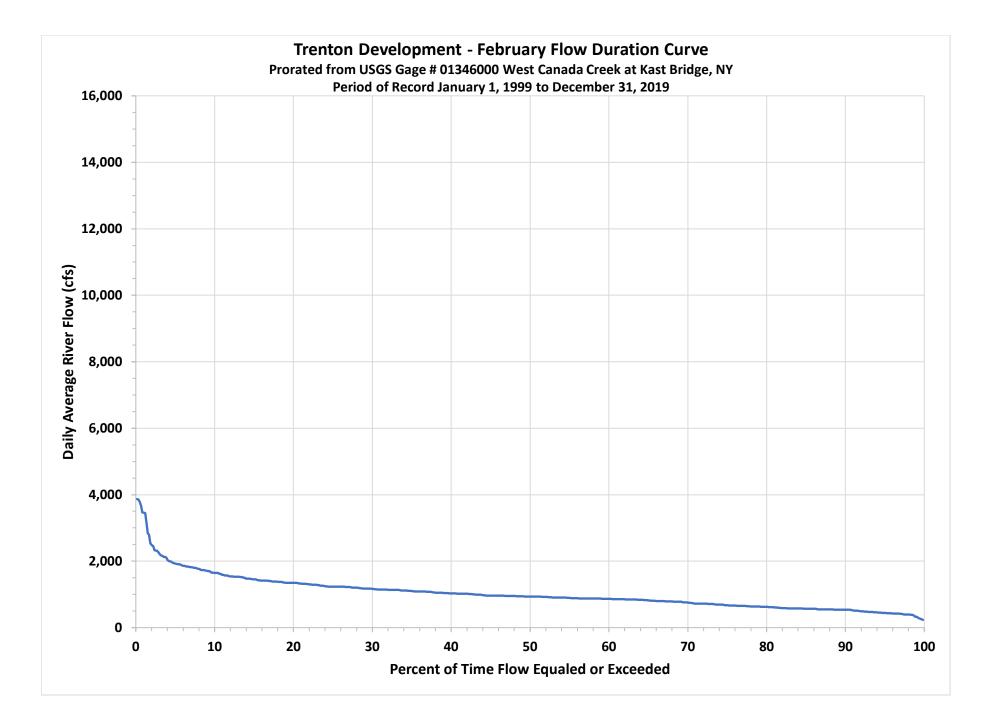


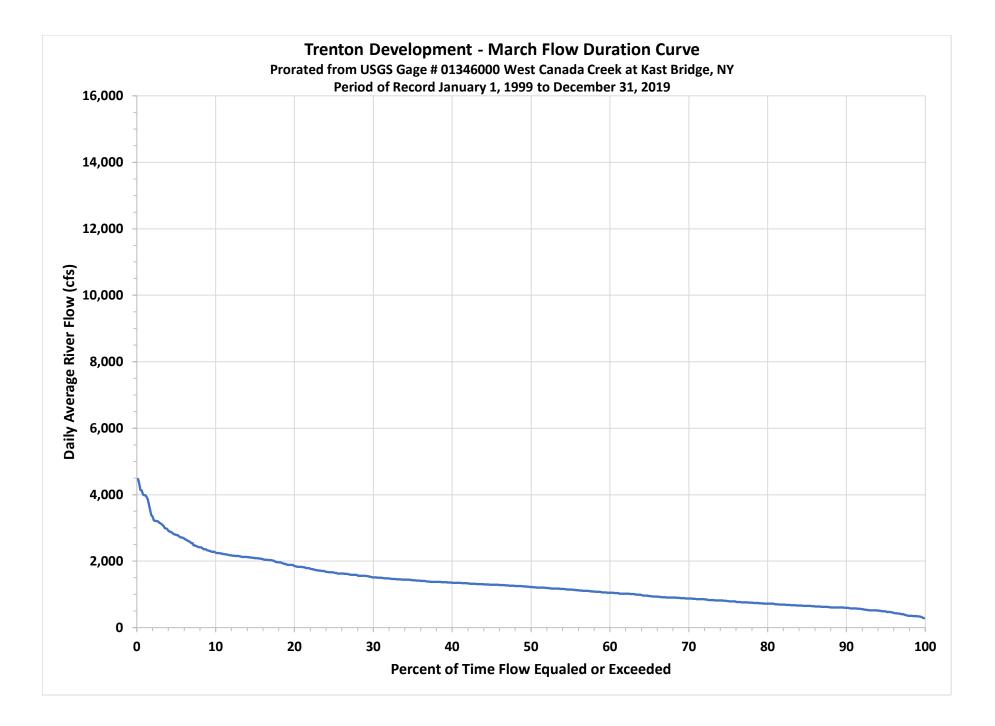


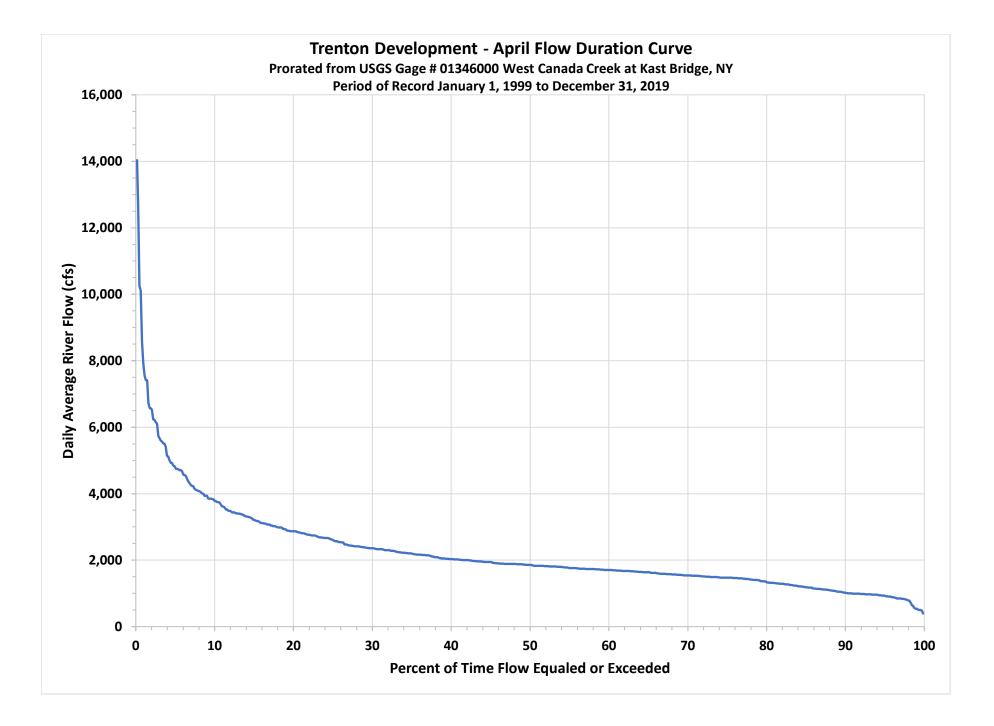


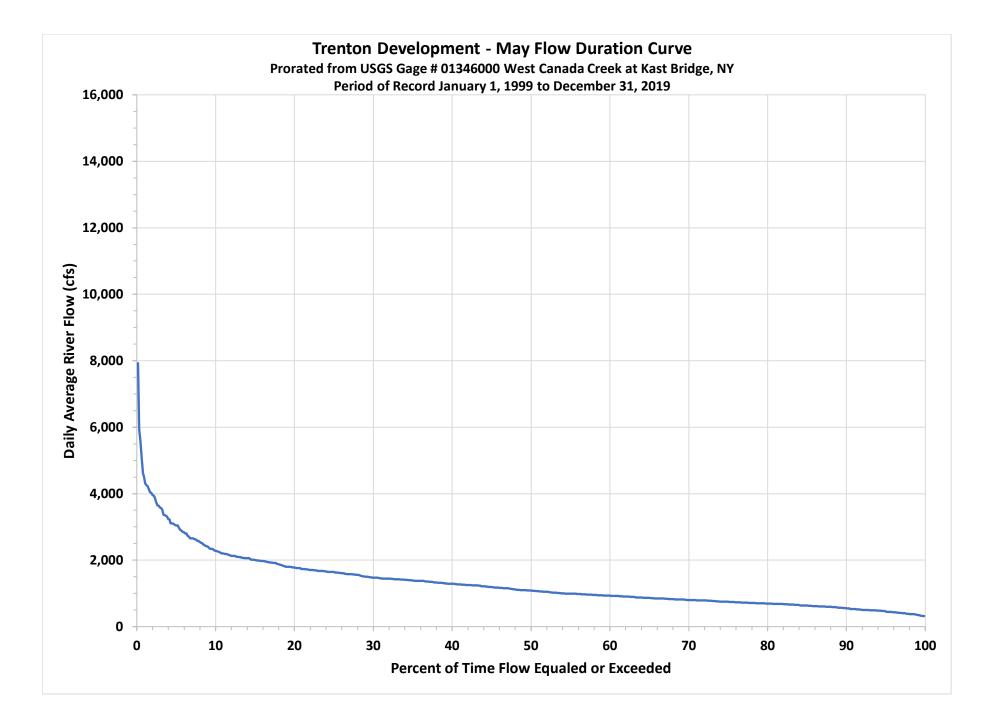


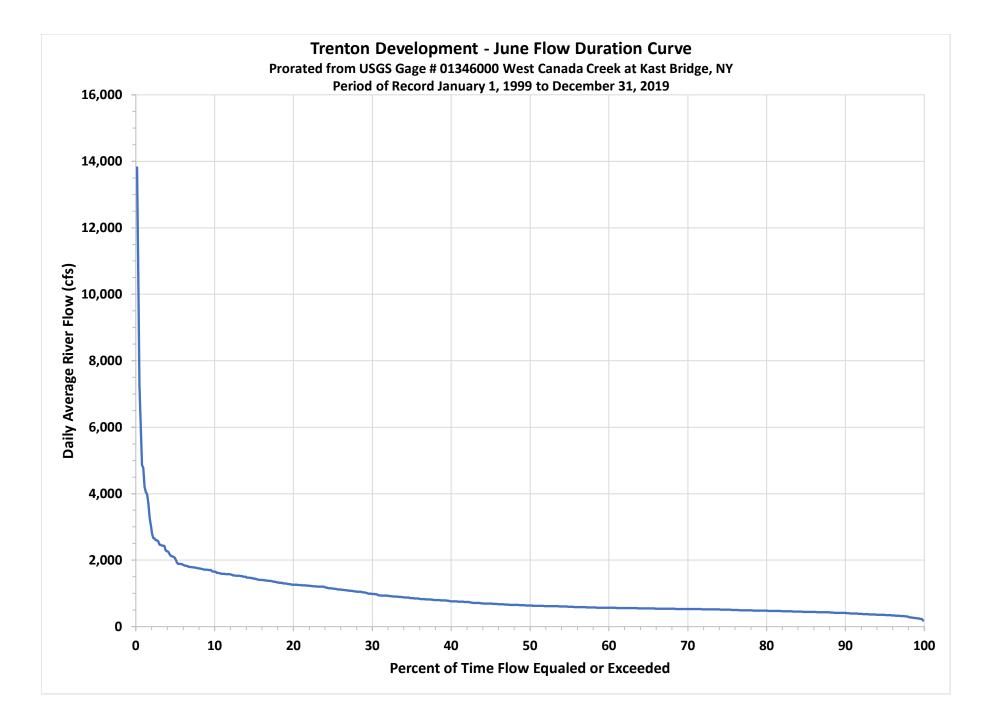


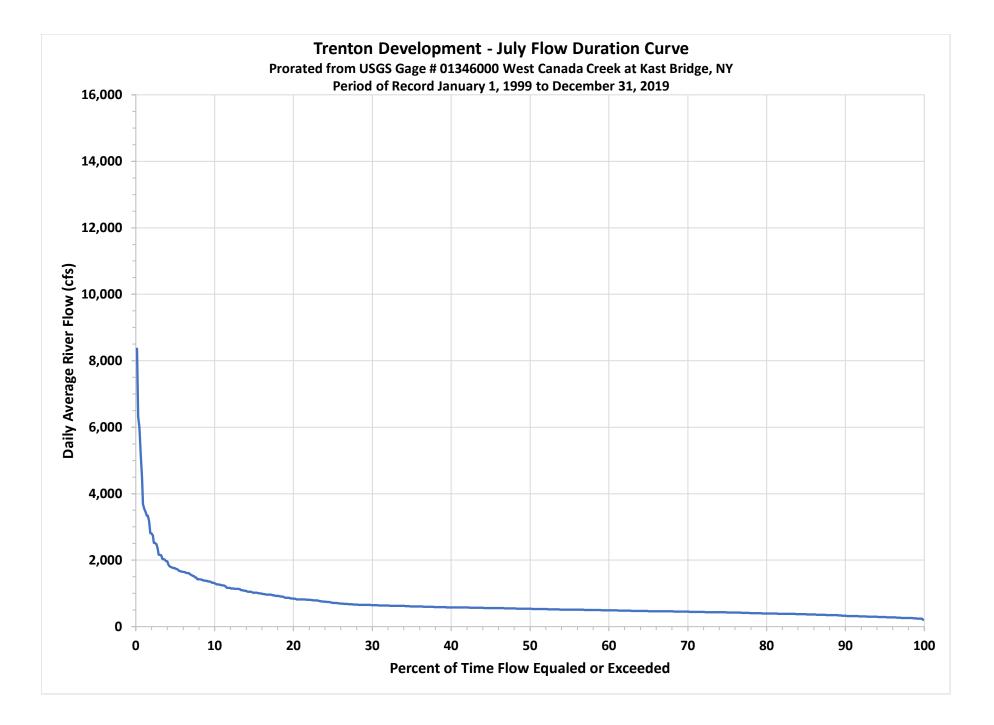


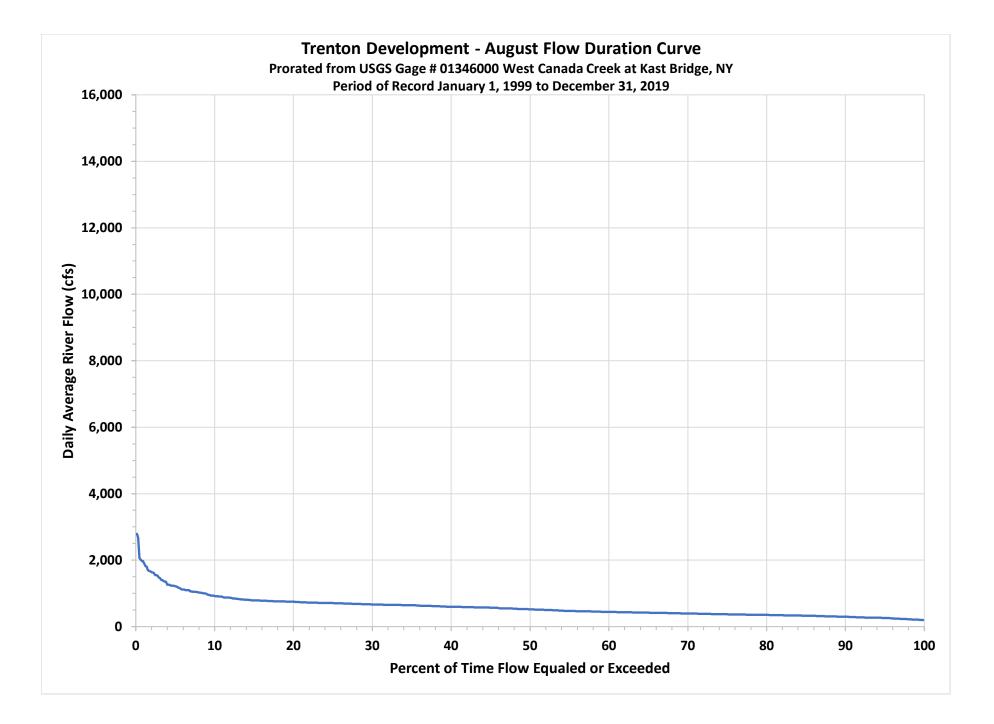


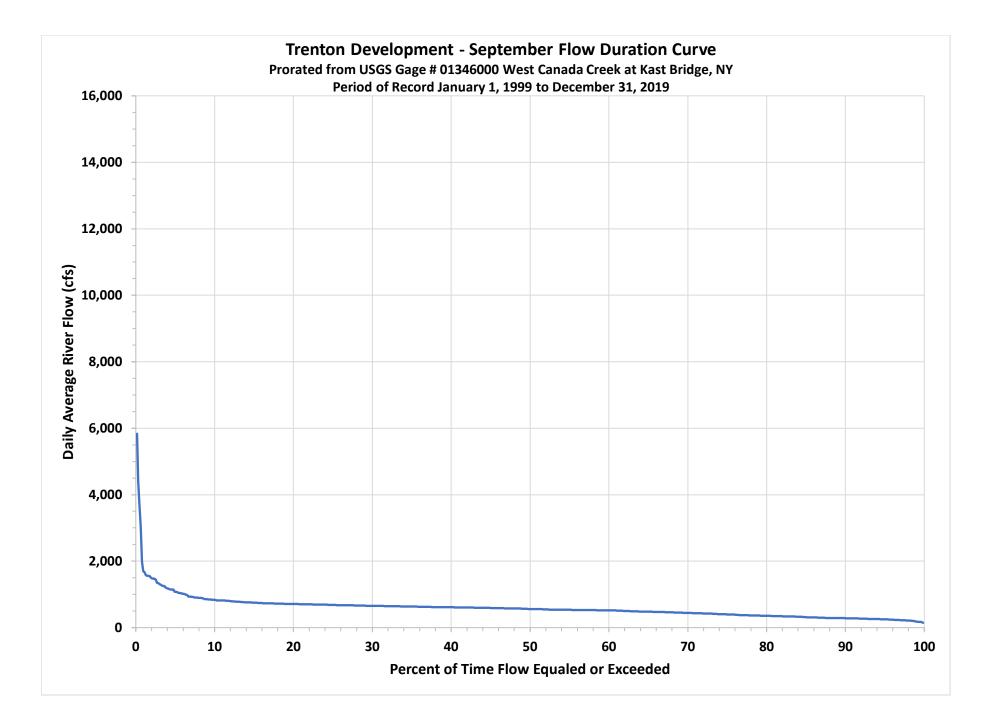


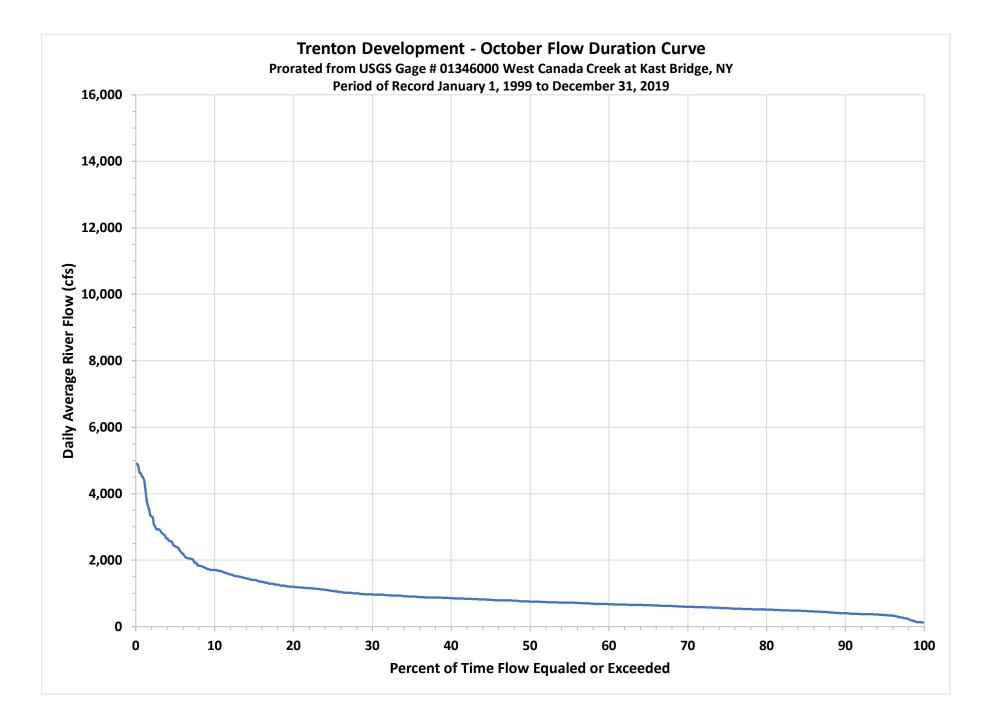


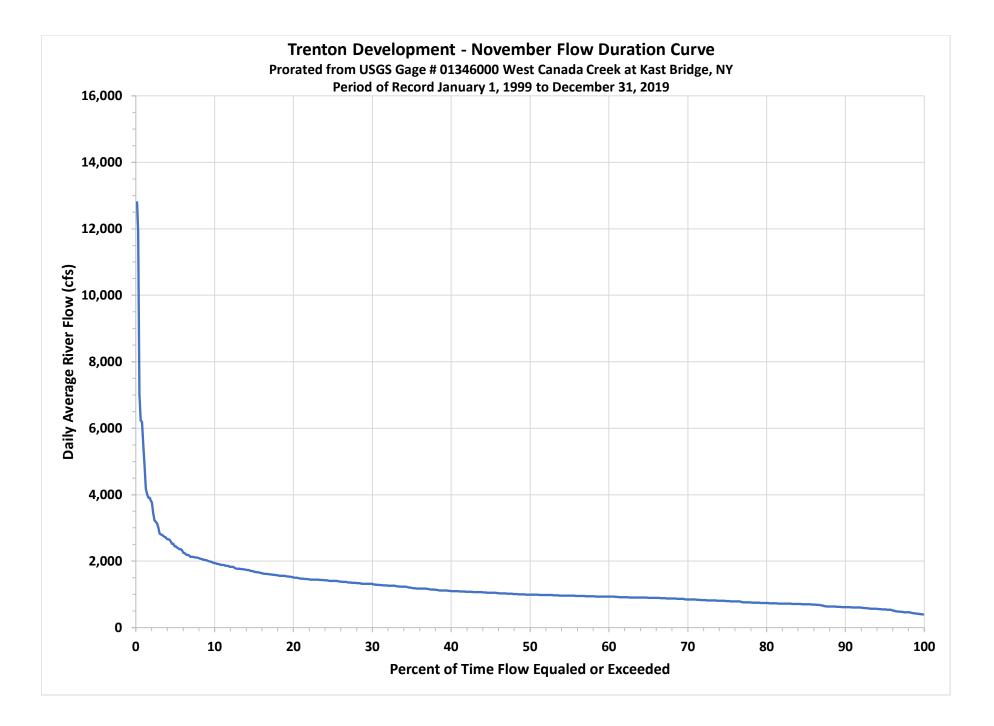


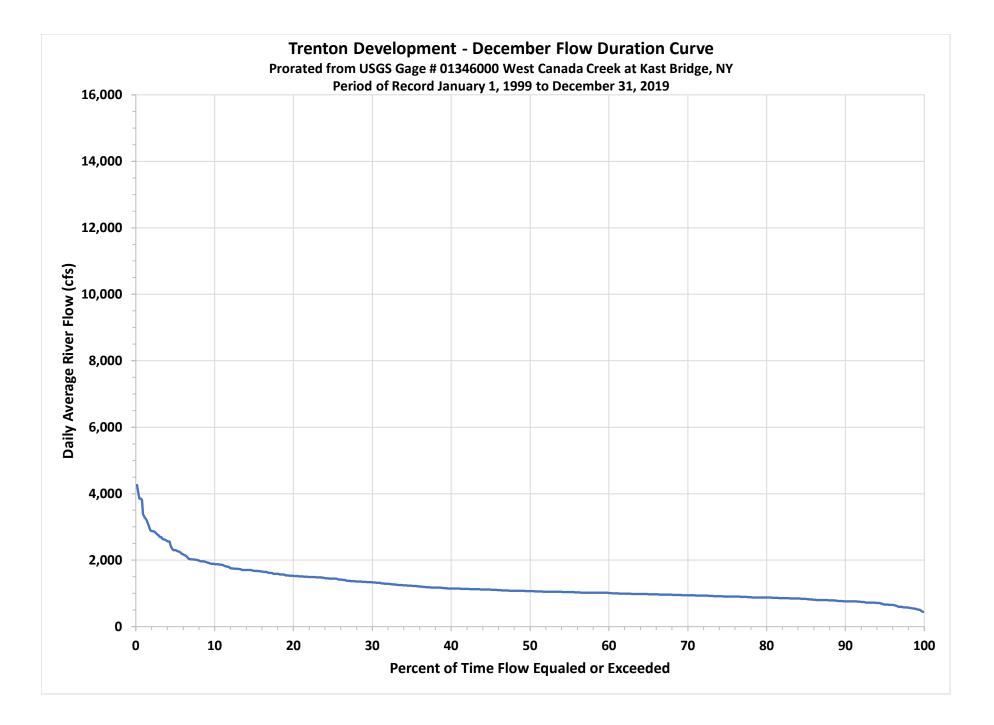












WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

Ехнівіт С

CONSTRUCTION HISTORY

TABLE OF CONTENTS

1.0	CONSTRUCTION HISTORY	1
2.0	PROJECT SCHEDULE OF NEW DEVELOPMENT	3

LIST OF TABLES

Table 1	Summary of Construction History at the Prospect Development1
Table 2	Summary of Construction History at the Trenton Development

1.0 CONSTRUCTION HISTORY

Table 1 provides a summary of construction history at the Prospect Development and Table 2 at the Trenton Development of the West Canada Creek Hydroelectric Project.

Year(s)	Activity
1959	Completion of Prospect Development.
1992	Repainting of three tainter gates.
1993	Rehabilitation program, including the post-tensioning of two bays (Bays No. 5 and 6) of the dam with three rock anchors rated 597.5 kips each.
1995	Construction of new substation and powerhouse roof replacement. Repair of rip-rap along the left inboard side of the canal.
1996	Repair of ditch at northern dike with granular material.
2003	Repair tainter gates (concrete remediation, seals and painting of upstream face).
2015	Runner rehabilitation

Table 1Summary of Construction History at the Prospect Development

Table 2 Summary of Construction History at the Trenton Development

Year(s)	Activity
1901	Completion of original Trenton Hydroelectric Development with
	7 foot diameter woodstave penstock, and powerhouse No. 1 with 4
	units.
1917-1919	New powerhouse No 2. with two 6400 kW units. New 12 foot diameter
	woodstave penstock and surge tank.
1922	New 6400 kw unit at Powerhouse No. 2, and new intake structure with a
	10.5 foot tunnel extension to 12 foot diameter penstock. Six foot
	flashboards added at main spillway and 8 foot flashboards at auxiliary
	spillway.
1931	Seven foot diameter woodstave penstock replaced with steel.
1951	New flood gate at spillway of the dam.
1983	New intake structures and 14 foot diameter tunnel extension to
	penstock. New surge tank and concrete work at dam and auxiliary
	spillway.
1989	Abandonment (retirement in place) of Powerhouse No. 1 and Unit's 1
	through 4.

Year(s)	Activity				
1992-1993	 Rehabilitation program, including: A new concrete overlay at the downstream face of the non-overflow sections of the dam and a new drainage system to relieve seepage. A new ogee-shaped spillway crest. Replacement of 2-foot-high parapet wall, new gate sill and also new reinforced concrete apron at toe of floodgate structure. Concrete surface repair work throughout the site. Removal of existing gate operators at the retired waste sluice conduits 1 through 6. Construction of apron downstream of sluiceway/spillway section. New access stairway at the west non-overflow structure. Rehabilitation of access road to the powerhouse, including slope protection measures. 				
2004	Runner replacement on Units 5, 6, and 7.				
2004 2005	Construction of Trenton Falls Scenic Trail Installation of automated base flow release valve at the Trenton Powerhouse				
2006	 Painting of pipeline. Encasement of lower exposed portion of the No. 7 penstock in concrete. Post-flood rehabilitation (after flood of June 2006): Repair of powerhouse access road. Repair of dam access road. Rehabilitation of auxiliary spillway and flashboards. Repoint block retaining walls at main spillway. Construction of ADA Accessible Scenic Overlook at Trenton Falls Scenic Trail 				
2011	Lower Road repair due to flood Concrete slab installed at base of non-overflow – washed out due to flood				
2017	Penstock and surge tank orifice repair				
2020	 Post flood rehabilitation (after flood of October 31 - November 1, 2019) Repair of valve house. Repair of dam access road. Replacement of the existing wooden trippable flashboards along the auxiliary spillway with a pneumatic flashboard system. 				

2.0 PROJECT SCHEDULE OF NEW DEVELOPMENT

The West Canada Creek Project is an existing development and no new construction or modification of any project structures is proposed at this time.

WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

ЕХНІВІТ **D**

STATEMENT OF COSTS AND FINANCING

TABLE OF CONTENTS

1.0	ORIGI	NAL COST OF EXISTING UNLICENSED FACILITIES	1
2.0		ATED AMOUNT PAYABLE UPON TAKEOVER PURSUANT TO SECTION THE FEDERAL POWER ACT Fair Value Net Investment Severance Damages	1
3.0	ESTIM 3.1 3.2	ATED COST OF NEW DEVELOPMENT Land and Water Rights Cost of New Facilities	2
4.0	ESTIM 4.1 4.2 4.3 4.4 4.5 4.6	ATED AVERAGE ANNUAL COST OF THE PROJECT Capital Costs Taxes Depreciation and Amortization Operation and Maintenance Expenses Cost to Develop the License Application Costs of Proposed Environmental Measures	3 3 3 3
5.0	ESTIM	ATED ANNUAL VALUE OF PROJECT POWER	4
6.0	SOUR	CES AND EXTENT OF FINANCING	4

1.0 ORIGINAL COST OF EXISTING UNLICENSED FACILITIES

This section is not applicable to the West Canada Creek Hydroelectric Project (Project) because Erie Boulevard Hydropower, L.P. (Erie or Licensee) is not applying for an initial (original) license.

2.0 ESTIMATED AMOUNT PAYABLE UPON TAKEOVER PURSUANT TO SECTION 14 OF THE FEDERAL POWER ACT

Under Section 14(a) of the Federal Power Act (FPA), the Federal government may take over any project licensed by the FERC upon the expiration of the original license. The Commission may also issue a new license in accordance with Section 15(a) of the FPA. If such a takeover were to occur upon expiration of the current license, the Licensee would have to be reimbursed for the net investment, not to exceed fair value, of the property taken, plus severance damages. To date, no agency or interested party has recommended a federal takeover of the Project pursuant to Section 14 of the Federal Power Act.

2.1 Fair Value

The fair value of the Project is dependent on prevailing power values and license conditions, both of which are currently subject to change. The best approximation of fair value would likely be the cost to construct and operate a comparable power generating facility. Because of the high capital costs involved with constructing new facilities and the increase in fuel costs associated with operation of such new facilities (assuming a fossil fueled replacement), the fair value would be considerably higher than the net investment amount. If a takeover were to be proposed, the Licensee would calculate fair value based on then-current conditions.

2.2 Net Investment

The FPA defines "net investment" as the original cost, plus additions, minus the sum of the following items (to the extent that such items have been accumulated during the period of the license from earnings in excess of a fair return on such investment): (a) unappropriated surplus (b) aggregate credit balances of current depreciated accounts; and (c) aggregate appropriations of surplus or income held in amortization, sinking fund, or similar reserves.

The net book investment for the Project is approximately \$29,616,794 as of the end of 2020.

2.3 Severance Damages

Severance damages are determined either by the cost of replacing (retiring) equipment that is "dependent for its usefulness upon the continuance of the License" (Section 14, Federal Power Act), or the cost of obtaining an amount of power equivalent to that generated by the Project from the least expensive alternative source, plus the capital cost of constructing any facilities that would be needed to transmit the power to the grid, minus the cost savings that would be realized from not operating the Project. These values would need to be calculated based on power values and license conditions at the time of project takeover.

3.0 ESTIMATED COST OF NEW DEVELOPMENT

3.1 Land and Water Rights

The Licensee is not proposing to expand land or water rights as a consequence of this license application.

3.2 Cost of New Facilities

The Licensee is not proposing any capacity related developments for the Project.

4.0 ESTIMATED AVERAGE ANNUAL COST OF THE PROJECT¹

The estimated average annual cost of the total Project over the period of 2018 to 2020 was approximately \$4,376,642. This estimate includes costs² associated with existing and projected project operations and maintenance, as well as local property and real estate taxes, but excludes income taxes, depreciation, and costs of financing.

¹ The West Canada Creek Hydroelectric Project is a member of the Erie Boulevard Hydropower, LP portfolio of assets and costs are assigned to the overall portfolio; the costs herein are prorated from the total portfolio costs and are approximations.

² Including major maintenance costs.

4.1 Capital Costs

There is no fixed schedule for West Canada Creek Project life extension program, rather a sequence of activities designed to be implemented when needed. Accordingly, there is no fixed annual budget allocated for life-extension activities. These activities would be performed on an as-needed basis using existing planning procedures that provide short-and long-term windows to evaluate, schedule, and budget replacements and rehabilitation work in an orderly fashion.

4.2 Taxes

Property taxes for the 2020 fiscal year were approximately \$1.8 million. Income taxes for the Project are incorporated into costs of the Licensee's consolidated business and are not separated out for the Project.

4.3 Depreciation and Amortization

The annualized composite rate of depreciation for the Project is approximately 8.35 percent.

4.4 **Operation and Maintenance Expenses**

The estimated annual operation and maintenance expense for 2020 at the Project was approximately \$4,443,805. This estimate includes the property taxes noted in section 4.2.

4.5 Cost to Develop the License Application

The approximate cost to date to prepare the application for new license for the Project is \$1,500,000.

4.6 Costs of Proposed Environmental Measures

The Licensee is evaluating the need for protection, mitigation, or enhancement measures (PME). If Licensee proposes any PME measures, estimated costs of any proposed PME measures will be provided in the final license application.

5.0 ESTIMATED ANNUAL VALUE OF PROJECT POWER

The Licensee participates in the wholesale market administered by the New York Independent System Operator (NYISO). The Licensee estimates total annual energy production of about 224,044 MWh which will be sold at the prevailing market rates. The average market clearing price for energy in 2020 can be estimated based on the New York ISO website (https://www.nyiso.com/).

6.0 SOURCES AND EXTENT OF FINANCING

The Licensee's current financing needs are generated from internal funds. The Licensee is likely to finance major enhancements through earnings retention, equity contributions, third-party loans and loans made by the corporate parent or some combination of those mechanisms.

WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

Ехнівіт **G**

PROJECT MAPS

TABLE OF CONTENTS

1.0	PROJECT MAPS	.1
2.0	FEDERAL LANDS	.1

LIST OF TABLES

Table 1 Project Boundary Maps	1	
---------------------------------------	---	--

LIST OF FIGURES

Figure 1	Location	of the	Existing	Project	Boundary	near	Trenton	Development
	Substation	าร						2
Figure 2	Location of	of the	Proposed	Project	Boundary	near	Trenton	Development
	Substatior	าร					•••••	

1.0 **PROJECT MAPS**

The attached Exhibit G maps denote the West Canada Creek Hydroelectric Project (Project) boundary. Table 1 provides a summary of the drawing numbers and titles for the Exhibit G maps. The Project Boundary Maps show the Project vicinity, location, and boundary in sufficient detail to provide a full understanding of the Project. The Exhibit G maps were prepared in accordance with the requirements of 18 C.F.R. § 4.51(h).

Drawing Number	Title
Exhibit G- Sheet 1 of 4	Project Boundary Map
Exhibit G- Sheet 2 of 4	Project Boundary Map
Exhibit G- Sheet 3 of 4	Project Boundary Map
Exhibit G- Sheet 4 of 4	Project Boundary Map

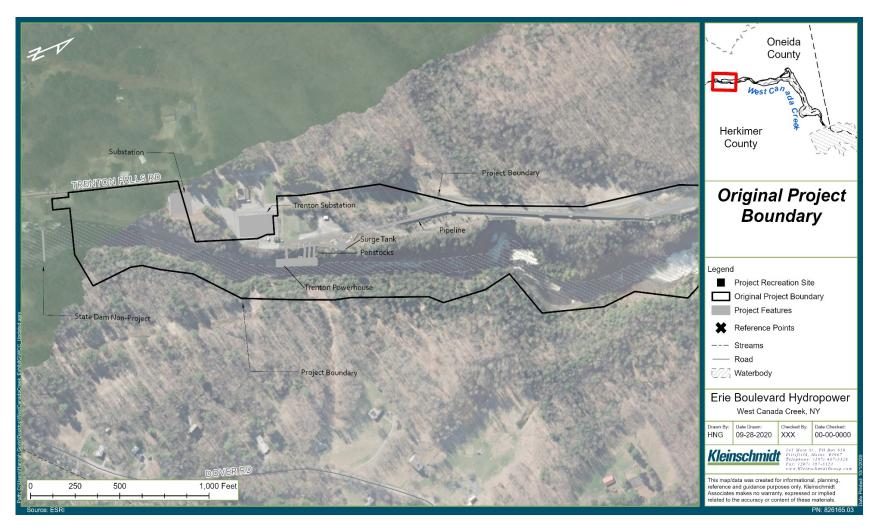
Table 1Project Boundary Maps

Erie Boulevard Hydropower, L.P. (Erie or Licensee) is proposing to modify the Project boundary to remove the existing substations at the Trenton Development, which are not a Project component and are owned by National Grid (not owned by Erie). Figure 1 denotes the location of the existing Project boundary under the existing license, and Figure 2 denotes the location of the proposed Project boundary modifications, which includes an overall reduction of about 1.8 acres of lands within the Project boundary . In addition, minor corrections to the West Canada Creek Project boundary occurred during the development of these maps to correct conflicts found between the Exhibit G drawings previously approved by Federal Energy Regulatory Commission (FERC or Commission) and the associated boundary description. The Exhibit G drawings incorporate these proposed Project boundary modifications and minor corrections. Erie possesses property or easement rights to all areas within the defined Project boundary.

2.0 FEDERAL LANDS

There are no public lands or reservations of the United States within the West Canada Creek Project boundary.

West Canada Creek Project (P-2701) Final License Application - Exhibit G





West Canada Creek Project (P-2701) Final License Application - Exhibit G

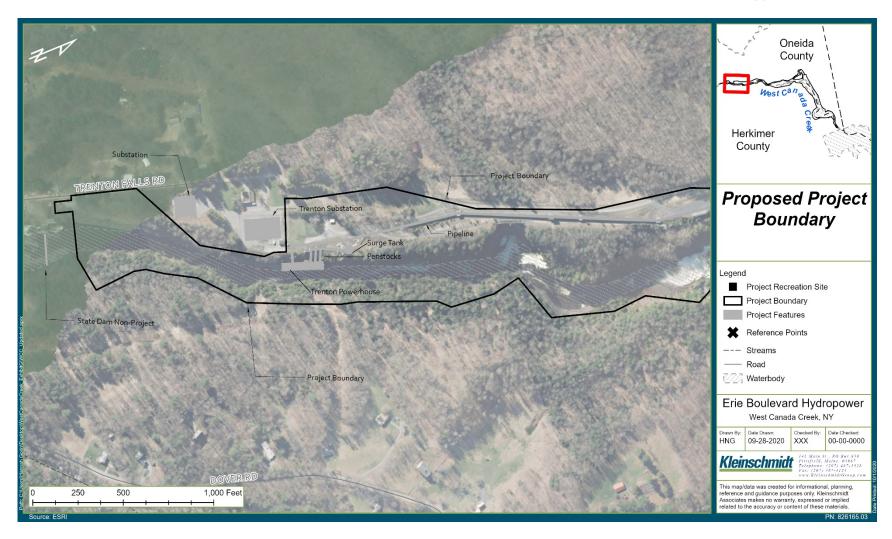
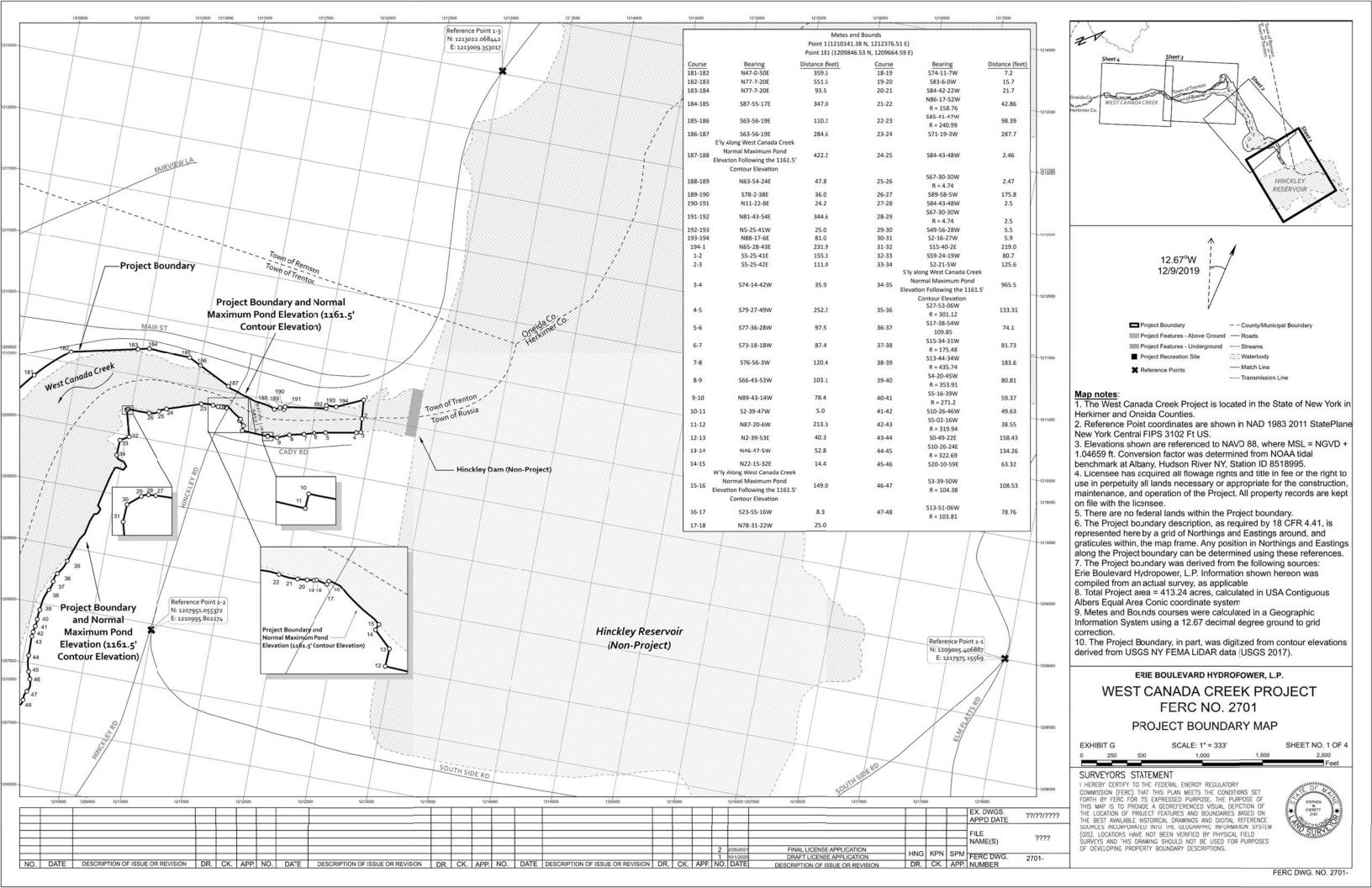
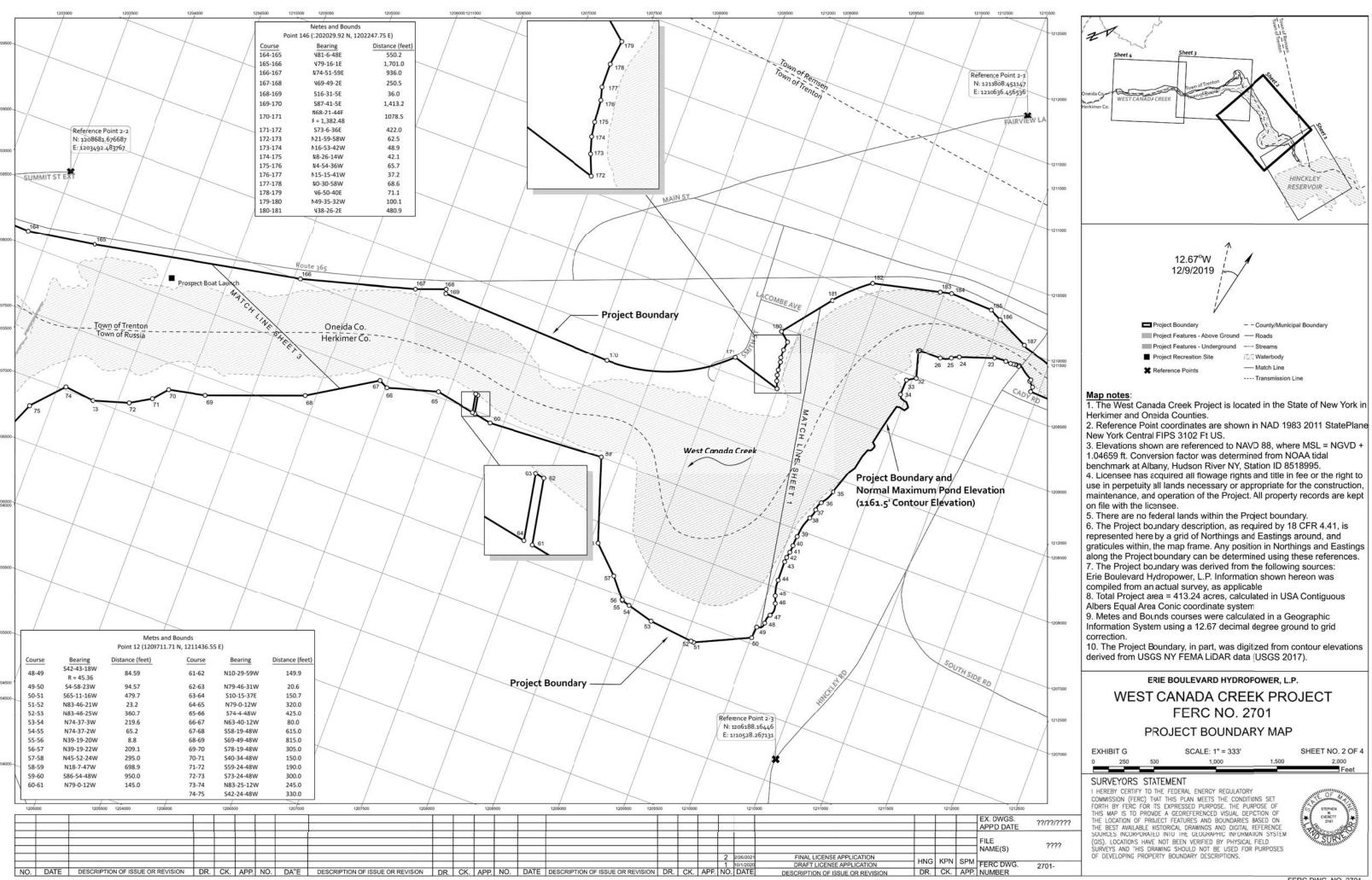


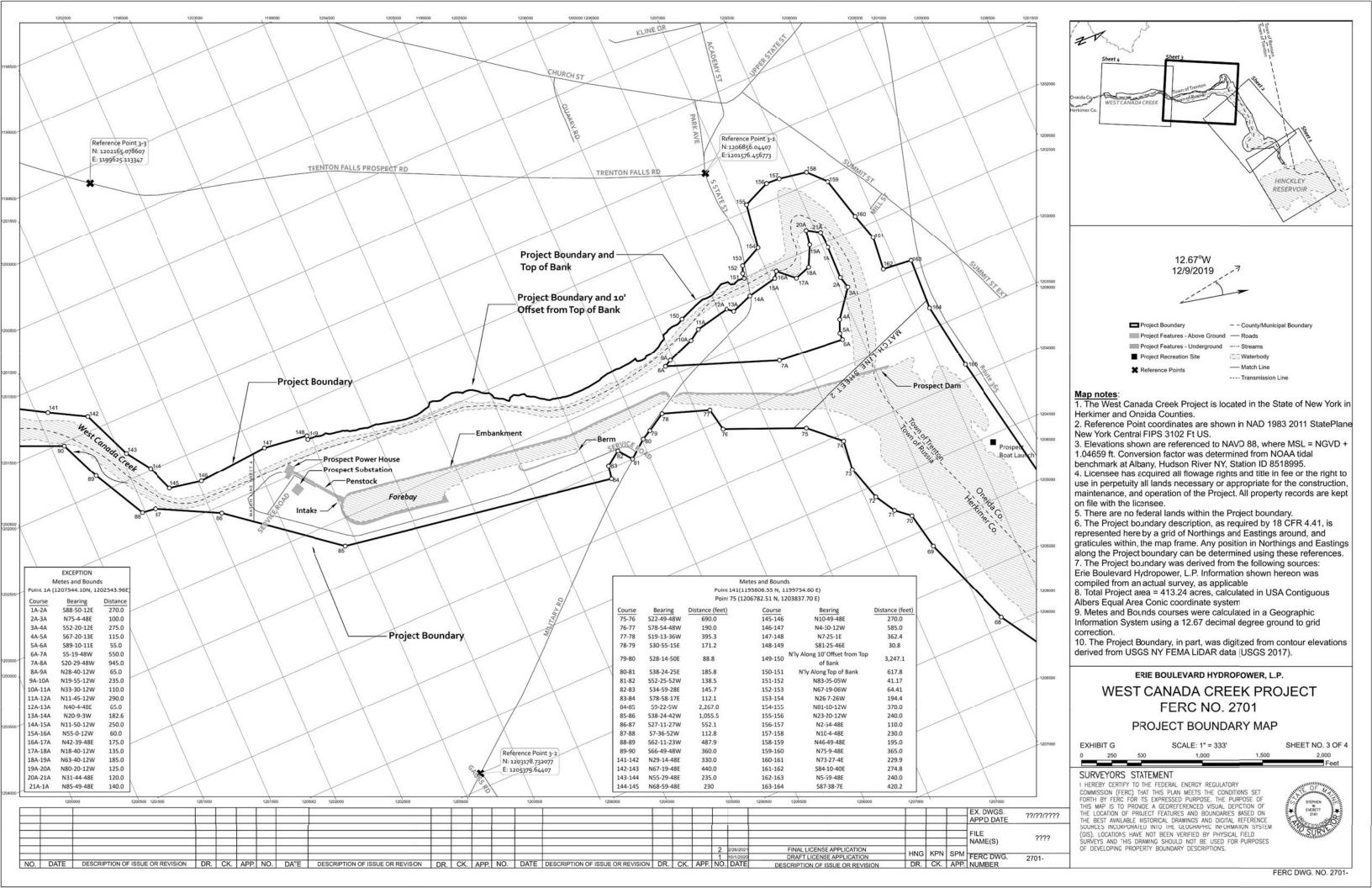
Figure 2 Location of the Proposed Project Boundary near National Grid Trenton Substations

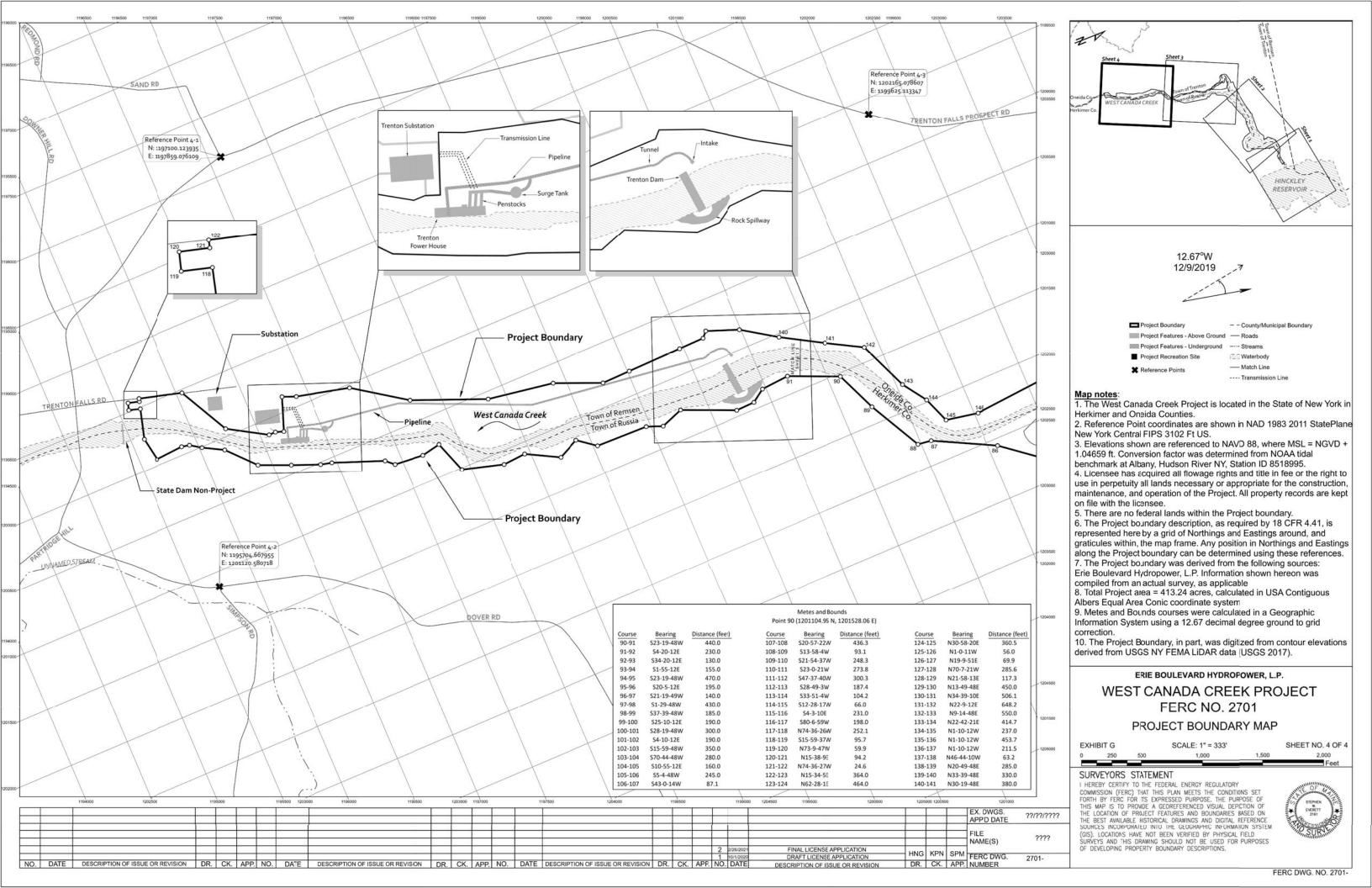
West Canada Creek Project (P-2701) Final License Application - Exhibit G

EXHIBIT G DRAWINGS









WEST CANADA CREEK HYDROELECTRIC PROJECT

FERC No. 2701

Ехнівіт Н

DESCRIPTION OF PROJECT MANAGEMENT AND NEED FOR PROJECT POWER

TABLE OF CONTENTS

1.0	INTRODUCTION				
2.0	INFOF	RMATION TO BE SUPPLIED BY ALL APPLICANTS	1		
	2.1	Plans and Ability of the Applicant to Operate and Maintain the Project			
		2.1.1 Plans to Increase Capacity or Generation			
		2.1.2 Plans to Coordinate the Operation of the Project with Other Water Resource Projects			
		2.1.3 Plans to Coordinate the Operation of the Project with Other Electrical Systems			
	2.2	Need for the Electricity Generated By the Project			
		2.2.1 The Reasonable Costs and Availability of Alternative Sources of Power			
		2.2.2 Increase in Costs if the Licensee is not Granted a License	3		
	2.3	Effects of Alternative Sources of Power	3		
		2.3.1 Effects on Licensee's Customers	3		
		2.3.2 Effects on Licensee's Operating and Load Characteristics	4		
		2.3.3 Effects on Communities Served By the Project	4		
	2.4	Need, Reasonable Cost, and Availability of Alternative Sources of Power	4		
	2.5	Effect of Power on Applicant's Industrial Facility			
	2.6	Need of the Tribe for Electricity Generated By the Project	4		
	2.7	Impacts on the Operations and Planning of the Licensee's			
		Transmission System of Receiving or Not Receiving the License	4		
	2.8	Statement of Need for Modifications to Existing Project Facilities or Operations			
	2.9	Consistency with Comprehensive Plans			
	2.10	Financial and Personnel Resources			
	2.11	Notification of Affected Landowners			
	2.12	Applicant's Electricity Consumption Efficiency Improvement Program			
	2.13	Tribes Affected By the Project			
3.0		RMATION TO BE PROVIDED BY AN APPLICANT WHO IS AN EXISTING	7		
	3.1	Measures Planned to Ensure Safe Management, Operation, and			
		Maintenance of the Project	7		
		3.1.1 Safe Management, Operation, and Maintenance	7		
		3.1.2 Description of Operation During Flood Conditions	8		

	3.1.3 Description of Warning Devices Used to Ensure Downstream	
	Public Safety	8
	3.1.4 Discussion of Any Proposed Changes to the Operation of the	
	Project or Downstream Development Affecting the	
	Emergency Action Plan	9
	3.1.5 Description of Monitoring Devices and Description of	
	Maintenance and Monitoring Programs	9
	3.1.6 Project's Employee Safety and Public Safety Record	9
3.2	Current Project Operation	10
3.3	Project History	10
3.4	Lost Generation Due to Unscheduled Outages	
3.5	Record of Compliance	11
3.6	Actions Affecting the Public	11
3.7	Ownership and Operating Expenses that would be Reduced if the	
	license were transferred	11
3.8	Annual fees for use of federal or Native American lands	11

APPENDICES

APPENDIX H-1 SINGLE LINE DIAGRAMS (FILED AS CRITICAL ENERGY/ELECTRIC INFRASTRUCTURE INFORMATION)

1.0 INTRODUCTION

The West Canada Creek Hydroelectric Project (Project) (FERC Project No. 2701) is an existing generating facility licensed to Erie Boulevard Hydropower, L.P. (Erie or Licensee), a Brookfield Renewable company. The Licensee is an independent power producer and, the Project generates low cost, clean, emissions-free, renewable power that is currently sold to the New York wholesale electricity market administered by the New York Independent System Operator (NYISO). Exhibit H provides information pursuant to 18 CFR § 5.18(c), including Erie's ability to operate and maintain the project, any plans to modify the project, Erie's safety management, operation and maintenance of the Project, and other applicable information to be provided by existing applicants pursuant to 18 CFR § 5.18(c)(1)(ii).

2.0 INFORMATION TO BE SUPPLIED BY ALL APPLICANTS

2.1 Plans and Ability of the Applicant to Operate and Maintain the Project

2.1.1 Plans to Increase Capacity or Generation

The Licensee has no current plans to increase the capacity or generation of the Project.

2.1.2 Plans to Coordinate the Operation of the Project with Other Water Resource Projects

The Licensee proposes to maintain existing project operations and coordination with other water resource Projects as described in Exhibit B. The West Canada Creek Project consists of two developments, Prospect and Trenton, and is located on West Canada Creek in Oneida and Herkimer counties, New York. The West Canada Creek Project is located directly downstream of the Gregory B. Jarvis Hydroelectric Project (FERC No. 3211), which is situated at the Hinckley Dam, and owned and operated by the Power Authority of the State of New York (NYPA or Power Authority). The Hinckley Dam, reservoir, and associated lands are owned by the People of the State of New York, under the jurisdiction of the New York State Canal Corporation's (NYSCC). The Hinckley Reservoir is operated by the NYSCC to: supply water to the New York State Canal System, provide domestic water supply¹, provide flows for hydroelectric power generation, provide base

¹ The Mohawk Valley Water Authority (MVWA) owns and operates the regional water system that provides drinking water for approximately 128,000 customers throughout 18 municipalities in Oneida and Herkimer

flows for aquatic resources, and provide flood protection for the West Canada Creek and lower Mohawk River Valleys. The Hinckley Reservoir regulates flows for the generation of hydroelectric power at the Jarvis Project and at the West Canada Creek Project.

The current FERC license for the Jarvis Project allows for peaking operations and requires the Power Authority (as licensee for the Jarvis Project) to coordinate with Erie (as licensee for the West Canada Creek Project) and the NYSCC to maintain a continuous base flow of 160 cfs in West Canada Creek, as measured immediately downstream of the NYSCC diversion weir (Nine Mile Creek Feeder Dam). The Power Authority Hydrologist communicates with the Erie Water Resource Manager twice weekly to discuss the application of the 2012 Operating Diagram based upon reservoir elevation in relation to the rule curve. The West Canada Creek Project is typically operated so that daily average inflows from Hinckley Reservoir (as controlled by the NYSCC and Power Authority based upon the 2012 Operating Diagram) into the Project are released from the Prospect and Trenton developments that same day to maintain daily average outflows (i.e., daily average inflows equal daily average outflows).

Approximately 1 mile downstream of the Trenton Dam is the NYSCC diversion weir (also known as the Nine Mile Creek Feeder Dam or Morgan Dam), which diverts flow from West Canada Creek into the Nine Mile Feeder Canal and feeds into the New York State Canal System. Flows are diverted primarily during the navigation season² with releases to supplement downstream canal water levels to help maintain navigability in the canal system.

Approximately 13 miles downstream of the Nine Mile Creek Feeder Dam is the Newport Dam associated with the Newport Hydroelectric Project which operates under an exempt FERC license (FERC No. 5196) with a 1,960-kW capacity. Further downstream, approximately 26 miles below the Nine Mile Creek Feeder Dam is the Herkimer Dam associated with the Herkimer Hydroelectric Project (FERC No. 9709), with a licensed capacity of 1,680 kW.

Counties (MVWA 2020 at <u>https://www.mvwa.us/.</u>). The MVWA intake is located at the Hinckley Dam and withdrawals occur from Hinckley Reservoir, upstream from the West Canada Creek Project.

² The New York State canal system navigation season is typically from mid-May through mid-October (NYSCC 2020 at <u>http://www.canals.ny.gov/boating/index.html.</u>).

2.1.3 Plans to Coordinate the Operation of the Project with Other Electrical Systems

Erie, as a wholesale seller of generated electricity, sells the power generated from the West Canada Creek Project as a market participant in the NYISO. The Project is interconnected to the National Grid distribution and transmission system.

2.2 Need for the Electricity Generated By the Project

2.2.1 The Reasonable Costs and Availability of Alternative Sources of Power

The West Canada Creek Project generates emission-free, renewable power and the electrical output from the Project is sold wholesale into the NYISO administered market. The Project provides peaking and variable output generation of value to the grid. If the Project would not provide this variable output generation, replacement energy would most likely be replaced by natural gas fired peaking projects. Exhibit D of the Final License Application provides an analysis of the costs of producing Project power. Alternative sources are likely to be generating units powered by fossil fuels, whose fuel and other variable costs may be significantly higher than those of the Project.

2.2.2 Increase in Costs if the Licensee is not Granted a License

If the Licensee is not granted a license, this Project would cease to provide affordable, clean electricity to the NYISO. The NYISO and its wholesale customers would need to obtain the annual equivalent capacity and energy from other sources capable for meeting on-peak demands, and the cost and availability of such alternative sources of power would be determined by other suppliers available to NYISO. An unquantified increase in costs may occur to the electric customer in the region if a license for continued operation of the Project was not granted.

2.3 Effects of Alternative Sources of Power

2.3.1 Effects on Licensee's Customers

This section is not applicable to the Licensee since the Licensee sells its electricity into the NYISO.

2.3.2 Effects on Licensee's Operating and Load Characteristics

The Licensee is an independent power producer and, as such, does not maintain a separate transmission system which could be affected by replacement or alternative power sources.

2.3.3 Effects on Communities Served By the Project

See the discussion above in *Section 2.2, Need for Electricity Generated by the Project*, regarding the loss of the Project's generation. Because the Licensee cannot predict with any certainty the actual type or location of a potential alternative facility providing replacement power, it cannot specifically discuss potential effects of an alternative source of power on any particular community.

2.4 Need, Reasonable Cost, and Availability of Alternative Sources of Power

The Licensee is an independent power producer and, as such, does not have an obligation or need to prepare load and capability forecasts in reference to any particular group or class of customers. For the region, those obligations and tasks remain within the scope of services provided by the NYISO.

2.5 Effect of Power on Applicant's Industrial Facility

This section is not applicable as the Licensee does not use the power generated for its own industrial operations.

2.6 Need of the Tribe for Electricity Generated By the Project

The Licensee is not an Indian Tribe; therefore, this section is not applicable.

2.7 Impacts on the Operations and Planning of the Licensee's Transmission System of Receiving or Not Receiving the License

Because the Licensee is an independent power producer and does not own the local transmission system, this section is not applicable to the Licensee. However, power generated by the Project is currently transmitted to National Grid's transmission/distribution system as shown in the Single Line Diagram for the West Canada Creek Project (see Appendix H-1).

2.8 Statement of Need for Modifications to Existing Project Facilities or Operations

Erie has no plans to construct new facilities or to alter operations of the Project. Erie is seeking authorization to continue operating the Project in its current configuration and as it is currently licensed to operate.

2.9 Consistency with Comprehensive Plans

Section 10(a)(2)(A) of the Federal Power Act (FPA), 16 U.S.C. section 803 (a)(2)(A), requires FERC to consider the extent to which a project is consistent with Federal or state comprehensive plans for improving, developing, or conserving a waterway or waterways affected by the project. On April 27, 1988, the Commission issued Order No. 481-A, revising Order No. 481, issued October 26, 1987, establishing that the Commission will accord FPA section 10(a)(2)(A) comprehensive plan status to any Federal or state plan that: (1) is a comprehensive study of one or more of the beneficial uses of a waterway or waterways; (2) specifies the standards, the data, and the methodology used; and (3) is filed with the Secretary of the Commission. FERC currently lists 49 comprehensive plans for the State of New York. Of those the following 6 comprehensive plans are identified as pertaining to waters in the vicinity of the Project:

- Adirondack Park Agency. n.d. New York State wild, scenic, and recreational rivers system field investigation summaries. Albany, New York.
- National Park Service. The Nationwide Rivers Inventory. Department of the Interior, Washington, D.C. 1993.
- New York Department of Environmental Conservation. 1985. New York State Wild, Scenic, and Recreational River System Act. Albany, New York. March 1985.
- New York State Office of Parks, Recreation, and Historic Preservation. New York Statewide Comprehensive Outdoor Recreation Plan: 2003-2007³. Albany, New York. January 2003.
- U.S. Fish and Wildlife Service. Canadian Wildlife Service. 1986. North American waterfowl management plan. Department of the Interior. Environment Canada. May 1986.

³ An updated version dated 2020-2025 is available at <u>https://parks.ny.gov/documents/inside-our-agency/20202025StatewideComprehensiveOutdoorRecreationPlan.pdf</u>

• U.S. Fish and Wildlife Service. n.d. Fisheries USA: the recreational fisheries policy of the U.S. Fish and Wildlife Service. Washington, D.C.

Based on a review of these plans, Erie has determined that current and proposed operations of Project facilities are consistent with these plans.

2.10 Financial and Personnel Resources

Erie has considerable experience operating not only the West Canada Creek Project but other hydroelectric and water storage projects within New York State and within the region. Erie has available a complete staff of engineers, biologists, operators, mechanics, and electricians that are trained and experienced in the operation of hydroelectric projects. Erie has or can acquire the necessary resources to continue the efficient operation and maintenance of the Project. Information regarding the Project's expected annual costs and value is provided in Exhibit D of the Final License Application.

2.11 Notification of Affected Landowners

Erie is not proposing any modifications to the Project boundary, to encompass additional lands of others. Therefore, notification of adjacent landowners is not applicable.

2.12 Applicant's Electricity Consumption Efficiency Improvement Program

Because the Licensee is an independent power producer, this section is not applicable to the Project.

2.13 Tribes Affected By the Project

There are no Native American lands, known Native American traditional cultural properties or religious properties, or National Register-eligible or -listed sites associated with Native American Nations within the Project boundary or which would likely be affected by the Project relicensing. The following is a listing of Native American tribes that have been consulted by the Licensee (via distribution of the Notice of Intent, Pre-Application Document, Integrated Licensing Process (ILP) filings, and Draft License Application) and by FERC (letters dated March 9, 2018):

Oneida Indian Nation Ray Halbritter, Nation Representative Jesse Bergevin, Historian 2037 Dreamcatcher Plaza Oneida, NY 13421

Oneida Tribe of Indians of Wisconsin Tehassi Hill, Chairman N7210 Seminary Road Oneida, WI 54155

St. Regis Mohawk Tribe Chief Michael Conners Chief Beverly Cook Chief Eric Thompson 412 State Route 37 Akwesasne, New York 13655

The Oneida Indian Nation responded via email (April 4, 2018) that the Nation had no comments or concerns regarding the West Canada Creek Project relicensing. No additional responses were received.

3.0 INFORMATION TO BE PROVIDED BY AN APPLICANT WHO IS AN EXISTING LICENSEE

3.1 Measures Planned to Ensure Safe Management, Operation, and Maintenance of the Project

3.1.1 Safe Management, Operation, and Maintenance

Erie has developed, according to FERC's Guidelines for Public Safety at Hydropower Projects, Public Safety Plans for the West Canada Creek Project, which are revised on a regular basis as conditions warrant. These plans (and revisions) are reviewed and accepted by the FERC New York Regional Office. Erie operates the West Canada Creek Project consistent with its commitment to public and employee safety. Erie attains its safety goals by:

• Providing an in-depth management and technical support organization;

- Establishing and implementing specific operating procedures including standard bulletins;
- Training operations and maintenance personnel;
- Inspecting all Project facilities regularly and monitoring indicators of Project condition and safety;
- Implementing a rigorous inspection and maintenance program for operating equipment and facilities vital to safety;
- Limiting public access and providing warning signs and other public safety devices where Project operations or Project features could endanger the public consistent with FERC's Guidelines for Public Safety at Hydropower Projects (FERC 2011⁴), and Security Program for Hydropower Projects (FERC 2016⁵); and
- Complying with all applicable local, state, and federal laws and regulations regarding the safe operation of industrial and electric facilities.

These measures have been consistently applied and expanded as appropriate to ensure the safe, continued operation and maintenance of the Project. As described in the Project's Public Safety Plan, Erie implements public safety and security measures, such as signage, fencing, alert/warning devices, and boat barriers to protect public safety and for Project security purposes.

3.1.2 Description of Operation During Flood Conditions

A description of operations during flood conditions is provided in Exhibit B of this Final License Application.

3.1.3 Description of Warning Devices Used to Ensure Downstream Public Safety

Erie maintains a Fishermen Alert System (FAS) below the Trenton Powerhouse. The FAS includes one siren/strobe combination located at the Trenton Powerhouse, one siren/strobe combination adjacent to Morgan Dam, and one solar powered strobe located on Dover Bridge. The FAS is activated prior to loading any unit or increasing the flow out of the Trenton Powerhouse. Additionally, the FAS is activated prior to releasing any flows at the Trenton Dam.

 ⁴ FERC. 2011. Guidelines for Public Safety at Hydropower Projects. updated November 29, 2011.
 ⁵ FERC. 2016. Division of Dam Safety and Inspections FERC Security Program for Hydropower Projects Revision 3A.

The system is equipped with a programmable logic controller (PLC)that will either sound the siren or light the strobe. During daylight hours (6 am to 9 pm) the PLC is programmed to activate both the siren and the strobe. During nighttime hours (9 pm to 6 am) the PLC will activate only the strobe and not the siren to minimize the disturbance to local residents during times when they may be sleeping. The FAS can be activated by operations personnel located at Trenton Falls Station, or via a Supervisory Control and Data Acquisition (SCADA) command originated from the North American System Control Center (NASCC). In addition, Erie personnel visibly check the bypass reach prior to initially opening the flood gate.

Erie provides information regarding flow releases at the Trenton Powerhouse via SafeWaters (https://safewaters.com/home), a publicly accessible website and toll-free phone line (1-844-430-FLOW (3569). SafeWaters is updated daily and based on river gauge information, approximate forecasts, and estimated flows.

3.1.4 Discussion of Any Proposed Changes to the Operation of the Project or Downstream Development Affecting the Emergency Action Plan

Erie is not proposing any changes to the operation of the Project that would affect the Emergency Action Plan (EAP). Erie is not aware of any proposed downstream development that would be affected by the Project. Erie submitted the most recent annual update to the EAP for the Project on December 31, 2020.

3.1.5 Description of Monitoring Devices and Description of Maintenance and Monitoring Programs

Headpond and tailwater elevations are monitored at both developments with both electronic instrumentation and visual staff gages. Additional information regarding dam safety and monitoring is provided in the West Canada Creek Dam Safety and Surveillance Monitoring Plan (DSSMP), filed as Critical Energy Infrastructure Information (CEII) with the Commission. The Trenton Development DSSMP was last filed on March 24, 2020, and the Prospect Development DSSMP was last filed on October 11, 2017.

3.1.6 **Project's Employee Safety and Public Safety Record**

Erie has an excellent record of operating in a work-safe environment. During the past 10 years, there have been no employee deaths, lost-time accidents or recordable injuries at

the Project. There have been no project-related deaths or serious injuries to members of the public within the Project boundary during the past 10 years.

3.2 Current Project Operation

A description of Project operations is provided in Exhibit B of this Final License Application.

3.3 **Project History**

A description of Project history is provided in Exhibit C of this Final License Application.

3.4 Lost Generation Due to Unscheduled Outages

Table 1 summarizes unscheduled outages and lost generation during the previous 6-year period (2015-2020). This table lists unscheduled outages lasting longer than 24 hours, and therefore, does not include periodic brief unit outages. In order to maximize energy production from the facility, Erie has a consistent record of addressing outages immediately and preventative measures taken in order to prevent future occurrences.

Unit	Outage Start	Outage End	Duration	Reason for Unit Unavailability
	Time	Time	(Hours)	· · · · ·
Prospect 1	7/22/15 18:43	7/28/15 14:23	140	Burnt up collector rings.
Trenton 6	6/29/16 8:48	6/30/16 13:51	29	Ground repair.
Trenton 5	12/24/16 13:22	2/14/17 17:00	1252	Penstock flange leakage/failure.
Trenton 6	12/24/16 13:22	2/14/17 17:00	1252	Leak on unit 5, headgate closed.
Trenton 7	12/24/16 13:22	2/14/17 17:00	1252	Leak on unit 5, headgate closed.
Trenton 5	6/29/18 7:39	7/2/18 14:00	78	Burnt lightning arrester.
Trenton 5	1/30/19 6:06	2/1/19 12:54	55	Collector ring brush failure.
Prospect 1	3/15/19 13:38	3/16/19 13:54	24	Rack maintenance.
Prospect 1	5/23/19 20:22	5/25/19 8:45	36	National Grid line trip.
Trenton 5	11/1/19 7:36	11/3/19 11:42	52	Rack maintenance
Trenton 6	11/1/19 7:36	11/3/19 11:42	52	Rack maintenance
Trenton 7	11/1/19 7:36	11/3/19 11:42	52	Rack maintenance

Table 1Project Unscheduled Outages and Lost Generation, 2015-2020

3.5 Record of Compliance

The Project has a good record of compliance with the terms and conditions of the existing license. A review of the Licensees' records indicates no violations of the terms and conditions of the license. In addition, the Licensee has no records of communication from the Commission indicating possible noncompliance.

3.6 Actions Affecting the Public

Erie, as a generator of electric power and a major employer and taxpayer of the region, has strong ties with the communities in the region. Erie has provided charitable giving to several local organizations, such as donations to the Community Foundation of Herkimer and Oneida Counties and the Foothills Rural Community Ministry Food Pantry.

Erie has developed and maintains a public boat launch at the Prospect Reservoir. In addition, Erie, in partnership with the Town of Trenton, provides controlled public access to view the scenic Trenton Falls gorge for one or two weekends in the spring and one or two weekends in the fall annually since 2004⁶.

3.7 Ownership and Operating Expenses that would be Reduced if the license were transferred

This section is not applicable because there is no competing application to take over the Project and no proposal to transfer the license.

3.8 Annual fees for use of federal or Native American lands

This section is not applicable because the Project uses no federal or Native American lands.

⁶ The Trenton Scenic Trails event was cancelled during 2020 due to COVID safety considerations.

APPENDIX H-1

SINGLE LINE DIAGRAMS

This Material is Critical Energy/Electric Infrastructure Information (CEII). Members of the Public may Obtain Nonpublic or Privileged Information by Submitting a Freedom of Information Act (FOIA) Request.