



*Electronically filed*

November 15, 2024

Debbie A. Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

*NWE Letter No. NWE-THF-4470  
NWE-THF-4421 (Dated 5-23-2024)  
FERC-THF-2988 (Dated 3-22-2024)*

Re: NorthWestern Energy, Thompson Falls Hydroelectric Project P-1869  
AIR #2 Request for Extension of Time

Dear Secretary Reese:

On December 29, 2023, NorthWestern Energy (NorthWestern) filed its Final License Application (Application) with the Federal Energy Regulatory Commission (Commission or FERC) to relicense the existing Thompson Falls Hydroelectric Project, FERC Project No. 1869 (Project), located on the Clark Fork River, in Sanders County, Montana. On March 22, 2024, Commission staff from the Division of Dam Safety and Inspections (D2SI), in accordance with section 5.21 of the Commission's regulations, requested NorthWestern to file additional information to assist in the evaluation of NorthWestern's relicensing proposal.

On May 23, 2024, NorthWestern provided a response to AIR #1 from the March 22 Additional Information Request (AIR). However, AIR #2 requested information that required new and additional information be developed. Specifically, AIR #2 requested a separate engineering analysis and summary report that included an analysis of historical storms/floods that have occurred at the project, a flood frequency analysis of flows at the project, and a comparison of how potential flood impacts in areas upstream and downstream of the project, among other items. These are significant evaluations which required additional time to complete. For that reason, NorthWestern requested a 180-day extension (i.e., until November 19, 2024) to submit its response to AIR #2.

In order to evaluate historical floods at the Thompson Falls Development, NorthWestern is working with an Engineering Consultant to conduct a Hydrologic Hazard Assessment (HHA) to provide estimates for return periods for major flood events up to and including the both the IDF and PMF flood event. Recently while finalizing a Technical Memorandum and preparing inundation mapping for the area upstream of the dam, our Consultant identified an error in



the input data for the HHA model which significantly impacts the final estimates for the reoccurrence interval estimates. NorthWestern is working with the consultant to correct errors in the calculated natural flows used as inputs in the HHA model and we require additional time for final review of the input and output results documented in the report. For this reason, NorthWestern is requesting an additional 60 days to complete the response to AIR #2, until January 18, 2025.

Should you have any questions, please contact Boyd Burnett, Chief Dam Safety Engineer, [Boyd.Burnett@northwestern.com](mailto:Boyd.Burnett@northwestern.com).

Sincerely,

**Boyd Burnett, PE.**

*Chief Dam Safety Engineer*

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