



NWE-THF-4255

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

May 5, 2023

Re: NorthWestern Energy, Thompson Falls Hydroelectric Project P-1869-060
Updated Study Report and Request for Privileged Treatment of Cultural Resources Information

Dear Secretary Bose:

Pursuant to 18 CFR § 5.15(f), NorthWestern Corporation, d/b/a NorthWestern Energy (NorthWestern), is pleased to file the attached Updated Study Report (USR) for the relicensing of the Thompson Falls Hydroelectric Project (P-1869) (Project) under the Federal Energy Regulatory Commission's (FERC or Commission) Integrated Licensing Process (ILP). In accordance with Commission staff's September 1, 2022 Determination on Requests for Study Modifications,¹ this USR reports on the following:

1. Operations Study: A study of operational scenarios to provide flexible capacity and the potential impact of those operational scenarios on Project resources in the Project reservoir and below the powerhouses;
2. Total Dissolved Gas (TDG): A study of TDG in the Project reservoir, below the Main Channel Dam, and at the Birdland Bay Bridge;
3. Hydraulic Conditions: A three-dimensional hydraulics study to characterize water velocities and water depths between the Main Channel Dam and the High Bridge (below the Main Channel Dam);
4. Fish Behavior: Radio telemetry study of salmonids to evaluate movement paths/rates and behavior in response to hydraulic conditions, from downstream of the powerhouses to the Main Channel Dam;
5. Cultural Resources: Results of a field inventory of cultural resources in the Project's Area of Potential Effect; and
6. Environmental Justice: An evaluation to determine the presence of impacts of environmental justice communities in the surrounding community, and an assessment of whether those impacts would be disproportionately high and adverse for minority and low-income populations.

¹ See Letter from John Wood, FERC, to Mary Gail Sullivan, NorthWestern, Project No. 1869-060, Accession No. 20220901-3052 (issued Sept. 1, 2022).

In the attached USR, study reports on each of the above-listed six studies are presented in separate reports, together with an Executive Summary of the USR that contains a summary of each of the six studies. With the filing of the enclosed USR, the Commission-approved study plan for the relicensing of the Project is now complete—except for the Fish Behavior Study, which is continuing in 2023.² Except for this remaining work on the Fish Behavior Study, the enclosed USR contains a complete reporting of all studies and study plan modifications required by the Commission in this relicensing effort, including in its original May 10, 2021 Study Plan Determination,³ as well as its September 1, 2022 Determination on Requests for Study Modifications referenced above.

With the study phase of this relicensing now nearly complete, NorthWestern hereby notifies the Commission and relicensing participants of its intent to file a Draft License Application (DLA) in lieu of a preliminary licensing proposal, in accordance with 18 CFR § 5.16(c). As provided in the Commission's Process Plan and Schedule, NorthWestern will file the DLA no later than August 3, 2023.⁴

Prior to preparing the DLA, NorthWestern looks forward to discussing study results as presented in the USR with Commission staff and relicensing participants. As required under FERC's ILP regulations (18 C.F.R. §§ 5.15(f), (c)(2)), NorthWestern will be hosting a USR meeting on Wednesday, May 24, 2023. The meeting will be held at NorthWestern's Missoula, MT office, 1801 South Russell Street, from 9:00 AM until 2:00 PM Mountain Time. The meeting will be accessible remotely via Zoom, <https://us06web.zoom.us/j/88577088020> (Meeting ID: 885 7708 8020).

An additional USR meeting will be held on May 25, 2023, from 6:00 PM to 8:00 PM (Mountain Time), at the Sanders County Courthouse, 1111 W Main St, Thompson Falls, MT 59873. The Zoom option will be available for the evening meeting, <https://us06web.zoom.us/j/89620436330> (Meeting ID: 896 2043 6330).

Detailed meeting agendas are available at: <https://northwesternenergy.com/TFallsRelicensing>

NorthWestern welcomes comments on the attached USR. As required under FERC's ILP regulations (18 C.F.R. §§ 5.15(f), (c)(3)) and the Commission's Process Plan and Schedule, NorthWestern will be filing a summary of the USR meeting by June 9, 2023, and comments are due by July 9, 2023. Following an opportunity for NorthWestern to respond to any comments by August 8, 2023, Commission staff is expected to issue a Determination on Disagreements/Amendments for the second season of studies by September 7, 2023 (18 C.F.R. § 5.15(c)(6)).

Resource agencies, relicensing participants, and any interested member of the public may access the USR through FERC's eLibrary system (<https://elibrary.ferc.gov/eLibrary/search>) under Docket No. P-1869 and Sub-Docket 060. In addition, NorthWestern has uploaded the USR to its Project relicensing website, <https://northwesternenergy.com/TFallsRelicensing>

² Final results of the Fish Behavior Study will be included in the Final License Application for the Project, which will be filed with the Commission no later than December 31, 2023.

³ See Letter from Terry L. Turpin, FERC, to Mary Gail Sullivan, NorthWestern, Project No. 1869-060, Accession No. 20210510-3034 (issued May 10, 2021).

⁴ Scoping Document 2 for the Thompson Falls Hydroelectric Project, Appendix A, Project No. 1869-060, Accession No. 20201209-3043 (issued Dec. 9, 2020).

Finally, NorthWestern notes that the enclosed Cultural Resources Study contains sensitive, non-public information related to the location and character of cultural resources; therefore, pursuant to 18 C.F.R. § 388.112, NorthWestern requests privileged designation of this report in its entirety, and that the Commission maintain this report in its non-public file. As required by Commission regulation and guidance, each page of the Cultural Resources Study has been labeled as privileged and confidential, designated as CUI//PRIV, and marked "DO NOT RELEASE." See *id.* § 388.112(b)(1).

Should you have any questions, please contact me at (406) 497-3382, or via email at marygail.sullivan@northwestern.com.

Sincerely,



Mary Gail Sullivan
Director, Environmental and Lands

CC: Attached Distribution List
Andy Welch, NorthWestern Energy
John Tabaracci, NorthWestern Energy

Enclosure