



Peter Brandien
Vice President, System Operations

December 16, 2019

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

Re: Bear Swamp Power Company, LLC Pumped Storage Project No. 2669-089
Application for Relicensing of the Bear Swamp Project

Dear Secretary Bose:

ISO New England Inc. (“ISO-NE”)¹ offers this letter in support of the operational benefits to the New England bulk power system that will result from the continued operation of the Bear Swamp Project, a 676-megawatt (“MW”) pumped storage hydropower facility, as requested by Bear Swamp Power Company, LLC (“BSPC”) in its March 30, 2018 relicensing application. Specifically, BSPC has applied for a new hydropower license to continue to operate and maintain the Bear Swamp Project. The project’s current, original license was issued on April 28, 1970, and expires March 31, 2020.

ISO-NE supports the relicensing of the Bear Swamp Project, consisting of two generating facilities, the 666-MW Bear Swamp Pump Storage Development (“Bear Swamp PSD”)² and the 10-MW Fife Brook Development, located in the Deerfield River, Berkshire and Franklin Counties in Massachusetts. As is well-known, the New England power system has the potential to be energy constrained during times of inclement weather. Operational difficulties occur during severe and/or extended cold weather when the region’s fuel infrastructure is constrained, and, looking forward, they may appear at other times of the year as the region transitions to a fleet of resources that no longer has stored fuel.

The Bear Swamp Project is a pumped storage hydropower facility that can be available to supplement the loss of production from “just-in-time” resources when the weather is not

¹Capitalized terms used but not otherwise defined in this filing letter have the meanings ascribed thereto in the ISO’s Transmission, Markets and Services Tariff (“Tariff”). Section II of the Tariff contains the Open Access Transmission Tariff (“OATT”).

² In accordance with the Standard Large Generator Interconnection Agreement by and among ISO-NE, BSPC and New England Power, designated as Original Service Agreement No. ISONE/NEP-18-02 and made effective April 30, 2018, the Bear Swamp PSD is currently operational and is rated at approximately 600 MW (gross), with each unit in the pump storage rated at approximately 300 MW (gross). On January 25, 2016, BSPC submitted an Interconnection Request to increase the capability of the Bear Swamp PSD from 600 MW to 666 MW in 2020. As this letter relates to the relicensing application, the values in the letter are the post-uprate values.

cooperating. Currently, the project provides the region with power at times of high energy demand, and can serve as an additional operating reserve to respond to a given contingency, such as an unanticipated loss of generation, within the electric system. Accordingly, ISO-NE supports the relicensing of the Bear Swamp Project for its continued operation. Issuing a relicensing of the Bear Swamp Project will assist in meeting the region's current and future energy security challenges by providing a reliable supply of electricity when supply and production is otherwise limited.

Please feel free to contact me if you have any questions on this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Peter Brandien". The signature is written in black ink and is positioned above the typed name and title.

Peter Brandien
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Holyoke, Massachusetts this 16th day of December, 2019.

/s/ Julie Horgan

Julie Horgan
eTariff Coordinator
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