



July 19, 2019

John Wassam
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02214

RE: FirstLight Power Comments on Proposed Changes to RPS Class I and Class II Regulations

FirstLight Power ("FirstLight") appreciates the opportunity to offer comments on the Department of Energy Resource's (the Department's) proposed changes to the Renewable Portfolio Standard (RPS) Class I and Class II regulations pertaining to hydroelectric generation. FirstLight is a New England company with offices and generating facilities in Massachusetts and Connecticut. We are one of the largest providers of hydroelectricity in New England, with over 1,300 MW of capacity currently operating in the region.

In recent years, Massachusetts has committed substantial resources towards improving the environment, particularly focusing on climate change initiatives. Hydropower has historically been and remains one of the most important sources of carbon-free, renewable energy.

Hydroelectric generation, particularly here in New England, faces many challenges in addition to those shared by other renewable generation technologies. Significant capital investments are required for many environmental mitigation license requirements, as are operational limitations that can substantially limit revenue for a project. Therefore, FirstLight applauds the Department's efforts to reduce the regulatory and financial burden that is largely unique to hydroelectric generation as a renewable resource.

FirstLight also recognizes the need to balance hydroelectric generation's financial viability with the need to protect the health of our river systems. We believe the requirement that hydroelectric generation projects secure Low Impact Hydro Institute (LIHI) certification prior to qualifying as a Class I or Class II resource creates an environment that helps to find that balance. We also believe that it is appropriate to maintain the recertification requirement due to the potential for changing environmental factors and priorities, particularly those that can impact operations throughout the life of the project. We recommend that the Department maintain the recertification requirement.

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Again, we appreciate the Department's recognition of the value that hydropower provides and the Department's attempt to find a practical balance between financial viability and environmental regulation. Finding the appropriate balance will help to ensure that hydroelectricity remains a key resource in advancing New England's energy future.

Respectfully,

A handwritten signature in black ink, appearing to read "Len Greene".

Len Greene
Director, Government Affairs & Communications
FirstLight Power

