

Aspinook Hydro, LLC
A Subsidiary of Gravity Renewables, Inc.

Gravity Renewables, Inc.
1401 Walnut St. Suite 420
Boulder, CO 80302
Phone: 303.440.3378
Fax: 720.420.9956
www.gravityrenewables.com

January 9, 2020

RE: Wyre Wynd Hydropower Project P-3472
Draft License Application

To Whom It May Concern:

By this letter, Aspinook Hydro, LLC, (Aspinook Hydro), a wholly owned subsidiary of Gravity Renewables, Inc. (Gravity), is providing notification of Draft License Application (DLA) for review and comment. The Wyre Wynd Hydropower Project (Project) is located on the Quinebaug River, Town of Griswold, County of New London, Connecticut and has been continuously operating since its initial licensing in 1982. Pursuant to CFR 4.38 and 16.8, stakeholders have 90 days (in this case until April 8, 2020) to provide written comments on the DLA submittal.

The DLA is for a subsequent license for a minor water-power project 5MW or less pursuant to FERC's regulations. The DLA contains the existing information and results of several recent studies conducted as part of the licensing process to fully describe the Project, its operations, potential environmental effects, and proposed environmental protection, mitigation and enhancement measures to be implemented under the subsequent FERC license.

The following provides a status summary of potential Project modifications for consideration as part of the DLA:

- **Conversion to Run-of-River Operations (ROR)** – Under the existing license, the Project occasionally utilized 0.5 ft of reservoir storage and operated in Store-and-Release (SAR) mode. The DLA includes a proposal to convert to strict ROR operations where inflow is equal to outflow on an instantaneous basis.
- **Development of Flow Monitoring Plan** – A monitoring plan will be developed in order to document compliance with the proposed ROR operations. The plan will be developed following issuance of a subsequent license in consultation with resource agencies.
- **Environmental Flows** – Maintenance of the existing 120 cfs (or inflow, whichever is less) flow to the Project bypass reach. In order to optimize performance of future upstream fish passage facilities, environmental flows will be adjusted during the upstream fish passage season to enhance attraction flows to a fishway entrance in the area of the Project tailrace.

Additional analysis and consultations with resource managers to finalize environmental flow requirements is on-going.

- ***Downstream Fish and Eel Passage and Protection*** – Replacement of the existing trash rack structure with a low angled vertically inclined rack with an overall clear spacing of 1- inch, combined with a bypass system for clupeids and eels. This system would increase protection from impingement and entrainment as well as provide a safe migration route downstream of the Project. A conceptual design is provided in Exhibit E1, detailed design will be developed in coordination with resource agencies.
- ***Upstream Eel Passage*** - In order to enhance upstream passage for American eel, the licensee will conduct surveys in the Project tailwater to identify preferred migration routes. Results of the surveys will be used to determine the optimal location and type of upstream eelway for the Project.
- ***Fish Passage Adaptive Management Program*** – Implementation of a fish passage Adaptive Management Program (AMP) which incorporates a sequential approach to optimizing the benefit of management actions based on a combination of on- and off-site components. The proposed AMP will consist of the following phases:
 - Phase I – Engineering Design of Permanent Downstream and Interim Upstream Fish Passage Facilities
 - Phase II – Installation of Permanent Downstream and Interim Upstream Passage Facilities
 - Phase III – Optimization and Installation of Permanent Upstream Fish Passage Facilities

The AMP is described in further detail in Exhibit E.

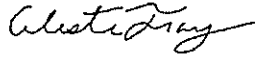
- ***Project Boundary Corrections*** - The existing Project Boundary (Exhibit G) did not accurately reflect the extent of the Project lands; it also included an adjacent mill building and lands downstream of the Project, which are not required for operation or maintenance of the Project. The DLA includes proposed updates to the Project Boundary to correct these items. Additional discussion on this subject is provided in Exhibit G.

The application package is available for review on Gravity's electronic data room, accessible at <https://gravityoncloud.egnyte.com/fl/wctpyPXibl>. If hard copies are required please coordinate with us directly.

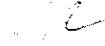
Please note that Exhibit F of the DLA is considered Critical Energy Infrastructure Information (CEII). As such, distribution of these materials is restricted and regulated and not available at the link above. Additional information on CEII can be found at: <https://www.ferc.gov/legal/ceii-foia/ceii.asp>.

Please feel free to reach out to Mr. Jonathan Petrillo, (jon@gravityrenewables.com) or, (celeste@gravityrenewables.com) if you have any questions regarding this notification.

Best regards,



Celeste Fay
Regulatory Manager
Gravity Renewables, Inc.
1401 Walnut St., Suite 420
Boulder, CO, 80302



Jonathan Petrillo
Director of Business Development
Gravity Renewables, Inc.
360 Thames Street, 4A
Newport, RI 02840

cc: Service List