



April 10, 2026

**Project No. 2572-142
Ripogenus Hydroelectric Project**

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Electronically Filed

Subject: Ripogenus Project (FERC Docket No. 2572-142); Response to Trout Unlimited Comments Regarding June 17, 2025, Station Outage

Dear Secretary Reese:

As follow-up to a station outage and minimum flow excursion that occurred at the Ripogenus Project (FERC No. 2572) on June 17, 2025, Great Lakes Hydro America, LLC (GLHA), licensee for the Project located on the West Branch of the Penobscot River (West Branch) in Maine, filed a report with the Commission on June 26, 2025. In response to this report, the Commission requested additional information in a letter dated August 5, 2025, which GLHA responded to on September 9, 2025. On March 3, 2026, the Commission requested that GLHA again provide additional information on the June 2025 station outage, specifically in response to comments and recommendations filed by Trout Unlimited (TU) on January 16, 2026.

Below are the Commission's requests for additional information and GLHA's responses:

1. **FERC:** *In summary, Trout Unlimited's filing alleges that your current Plan for Monitoring and Providing Minimum Flows under Article 403 does not meet the intent of Article 403 of the current license. This allegation is based on data they provide in the filing. Trout Unlimited requests that in order to remedy the alleged failure to meet the intent of Article 403 that you should be required to install, at your expense, a USGS-standard flow/temperature gage in the Telos Bridge area so that future events can be evaluated using accurate, independent data.*

GLHA: As detailed in the September 30, 2024, final license application for the Ripogenus Project, and as acknowledged by TU, GLHA has proposed to install a flow gauge downstream of the Ripogenus Project in the Big Eddy area of the West Branch (which is a short distance downstream of Telos Bridge) as a prevention, mitigation, and enhancement (PM&E) measure. Specifically, GLHA proposes to *coordinate with USGS "to fund installation, operation, and maintenance of a USGS gage downstream of McKay Station in the vicinity of Big Eddy (to be confirmed by USGS) to measure flow as described in the USGS Gage Study Report filed in the USR."* Therefore, GLHA agrees with TU's flow gage recommendation and, subject to the Commission's concurrence with this PM&E measure and issuance of a new Project license, will proceed with the gage installation as required by the terms and conditions of the new license. However, GLHA does not agree that this PM&E measure should be implemented prior to the assurance of a new license issuance, as GLHA maintains that the current flow monitoring protocols at the Project (using turbine curves and gate calculations) are sufficient for the interim period prior to license issuance.

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2. **FERC:** *Trout Unlimited states that in the absence of a USGS flow/temperature gage, you should direct the continuous release of 400 cubic feet per second (cfs) through a deep gate to buffer and mitigate the effects of future trip events, and direct you to return a dam keeper to Ripogenus Dam to reduce outage duration as per their prior request.*

GLHA: As indicated above, GLHA has proposed to coordinate with USGS to install a flow gage in the vicinity of Big Eddy (which is about 1.5 miles downstream of the Ripogenus Project's McKay Station) upon issuance of a new license for the Project.

GLHA has previously addressed suggestions for continuous flow releases from Ripogenus Dam. In its January 19, 2024 *"Interim Plan for Aquatic Resource Protection during McKay Station Outages"*, GLHA emphasized its concerns with a continuous flow release from Ripogenus Dam, chiefly in regard to public safety. In addition to the primary public safety concern (i.e., that a continuous flow release could potentially attract recreationists into the hazardous Upper Gorge area), GLHA stated that it agreed with the Maine Department of Inland Fisheries and Wildlife that releasing continuous and higher minimum flows from Ripogenus Dam could make the Upper Gorge unfishable and reduce angling opportunities in this stretch, plus it would likely exacerbate low water levels in the Ripogenus impoundment.

In summary, and aside from the fact that flow releases from Ripogenus Dam cannot be used for energy generation to meet increasing demands being placed on the electrical grid, GLHA expressed concern with a continuous flow release in its January 19, 2024 letter, noting that *"(1) the amount of flow necessary to protect fish and macroinvertebrates during an outage is unknown and unproven, (2) a continuous flow release could potentially attract recreationists into the hazardous Upper Gorge area downstream of Ripogenus Dam, and (3) the water release could result in lower Ripogenus impoundment water levels, thereby potentially impacting impoundment stakeholders."*

GLHA has also previously addressed suggestions to retain a dam keeper at the Project, stating in its June 21, 2024 response to a Commission additional information request that:

"Although having onsite personnel at McKay Station would reduce the amount of time it takes to restore full river flow, GLHA does not believe that staffing of the station would appreciably reduce fish mortalities during an outage. The reason for this is because an onsite crew would first attempt to troubleshoot and correct the root cause of any trip before attempting to restart the station, i.e., restarting McKay Station after a station trip is more involved than simply flipping a switch or pushing a button. If the crew was unsuccessful in reenergizing the station, then they would travel to Ripogenus Dam to initiate the public safety process for opening a gate. In either case, it is unlikely that river flows could be restored quickly enough to protect fish that are stranded out of water, as the 2022 fish stranding study demonstrated that these dewatered fish expire quickly. This is one of the main reasons (along with public safety) as to why an automated approach that quickly releases flows directly into the West Branch at McKay Station during outages has been utilized at the Project since 1991."



Please feel free to contact me by e-mail at Kevin.Bernier@brookfieldrenewable.com or by phone at (207) 951-5006 if you have any questions or comments.

Sincerely,

Kevin Bernier

Kevin Bernier
Senior Compliance Specialist

cc: M. Calloway; FERC

P. McDonough, C. Goodhart, R. Dill, R. Dorman, J. York, K. Pocquette, D. Heidrich, S. Hill,
N. Weaver, M. Osborne, T. Mapletoft, M. Scarzello, K. Murphy, J. Seyfried; GLHA

GLHA File: GLHA/Licensing & Compliance/Ripogenus 2572/01 Brookfield Corres

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