

Via eFile

July 14, 2026

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Subject: Ripogenus Hydroelectric Project (FERC No. 2572-141)
Penobscot Mills Hydroelectric Project (FERC No. 2458-273)
Response to MEPRO Whitewater Boating Flow Proposal**

Dear Secretary Reese:

Great Lakes Hydro America, LLC (GLHA) herein files with the Federal Energy Regulatory Commission (FERC) a response to the whitewater boating flow proposal filed with FERC on January 22, 2026 by MEPRO for the Ripogenus Hydroelectric Project (FERC No. 2572) and the Penobscot Mills Hydroelectric Project (FERC No. 2458) (collectively referred to as the “Projects”). The Projects are located on the West Branch of the Penobscot River and Millinocket Stream in Piscataquis and Penobscot Counties, Maine.

GLHA is pursuing new separate licenses from FERC for the continued operation and maintenance of the Projects. On September 30, 2024, GLHA filed with FERC the Final License Applications in support of obtaining new licenses for the Projects pursuant to the Commission’s regulations at 18 Code of Federal Regulations §5.17. In the Final License Application, GLHA proposed various protection, mitigation, and enhancement (PM&E) measures related to continued operation and maintenance of the Projects including proposed whitewater boating flows from the Ripogenus Project.

On January 22, 2026, MEPRO filed with FERC a whitewater boating flow proposal for the Ripogenus Project. GLHA has reviewed the whitewater flow proposal and herein provides a response to the proposal.

Concurrent with this filing, GLHA is providing a copy of this letter to all parties listed on the enclosed distribution list. Parties can download an electric copy of the public portions of this filing from FERC’s eLibrary system at <https://www.ferc.gov/ferc-online/elibrary> by conducting a search using the docket numbers P-2458 and/or P-2572.

If you have any questions regarding this letter, please contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,



Michael Scarzello
Manager, Licensing
Brookfield Renewable N.A.

cc: Relicensing Distribution List

Response to MEPRO Whitewater Boating Flow Proposal

Introduction

On January 22, 2026, the Maine Professional River Outfitters (MEPRO) filed a letter with FERC describing a proposed whitewater boating flow schedule for the Ripogenus Project. As further described herein, Great Lakes Hydro America, LLC (GLHA) compared the MEPRO proposal in relation to both the existing whitewater boating flow schedule (per Article 402 of the existing FERC License and a settlement agreement between the licensee and MEPRO dated September 2, 1993) and the GLHA-proposed whitewater boating flow schedule as described in the Final License Application filed with FERC on September 30, 2024.

Summary of Whitewater Boating Flow Schedules

Summaries of the existing and proposed whitewater boating flow schedules are provided in the tables below:

Table 1. Currently Required Whitewater Boating Flows per the Existing FERC License & 1993 Settlement Agreement

Date Range	Currently Required Minimum Boating Flows
May 1 – September 15 (8:30 AM – 5:00 PM)	Normal hydrologic year: • 2,300 cfs (Sat, Sun) • 2,200 cfs (Mon, Fri) • 2,000 cfs (Tue, Wed, Thu) Wet or dry hydrologic year: • 2,200 cfs (Sat, Sun) • 2,000 cfs (Mon, Fri) • 1,800 cfs (Tue, Wed, Thu)
September 16 – October 1 (8:30 AM– 5:00 PM)	Normal hydrologic year: • 2,300 cfs (Sat, Sun) Wet or dry hydrologic year: • 2,200 cfs (Sat, Sun)

Table 2. GLHA-Proposed Target Whitewater Boating Flows per the Final License Application (filed with FERC on September 30, 2024)

Date Range	GLHA-Proposed Target Boating Flow
May 1 – September 15 (8:30 AM – 5:00 PM)	Normal and wet hydrologic periods: • 2,300 cfs (weekend days) • 2,000 cfs (weekdays) Dry hydrologic period: • 1,800 cfs (daily)
September 16 – October 1 (8:30 AM– 5:00 PM)	Normal and wet hydrologic periods: • 2,300 cfs (weekend days) Dry hydrologic period: • 1,800 cfs (weekend days)

Table 3. MEPRO-Proposed Whitewater Boating Flows per Letter Filed with FERC on January 22, 2026

Date Range	MEPRO-Proposed Boating Flows
May 1 – Friday prior to Memorial Day Weekend (8:30 AM – 3:00 PM)	Normal hydrologic period: • 2,300 cfs (Sat, Sun) • 2,200 cfs (Mon, Fri) • 2,000 cfs (Tue, Wed, Thu) Dry hydrologic period: • 1,700 cfs (daily)
Memorial Day Weekend (Saturday) thru Sunday of Labor Day Weekend (8:30 AM – 3:00 PM)	Normal hydrologic period: • 2,300 cfs (Sat, Sun) • 2,200 cfs (Mon, Fri) • 2,000 cfs (Tue, Wed, Thu) Dry hydrologic period: • 2,200 cfs (Sat, Sun) • 2,000 cfs (Mon, Fri) • 1,800 cfs (Tue, Wed, Thu)
Labor Day thru October 1 (8:30 AM – 3:00 PM)	Normal hydrologic period: • 2,300 cfs (Sat, Sun) Dry hydrologic period: • 2,200 cfs (Sat, Sun)

Evaluation of MEPRO Proposed Whitewater Boating Flow Schedule

GLHA compared the whitewater boating flow schedules as they relate to volume of water and average flow over the whitewater boating flow season, as well as the number of days and hours per day that whitewater boating flows are provided, with the results shown in the table below:

Table 4. Comparison of Whitewater Boating Flow Schedules

Whitewater Boating Flow Schedule (Scenario)	Average Annual* Volume of Water for Required Whitewater Boating Flows (acre-feet)	Average Whitewater Boating Flow over Season (cfs)	Total No. of Days Whitewater Boating Flow Required	Hours per Day Whitewater Boating Flow Required
Current Whitewater Flow (Baseline R3)	233,570	2,210	142 (5/1-9/15: 7 days/week) (9/16-10/1: weekends only)	9 hours** (8:30 AM to 5:00 PM)
GLHA-Proposed Whitewater Flow (per FLA)	220,360	2,080	142 (5/1-9/15: 7 days/week) (9/16-10/1: weekends only)	9 hours** (8:30 AM to 5:00 PM)
MEPRO-Proposed Whitewater Flow	175,890	2,140	124-130*** (5/1 – Sunday prior to Labor Day: 7 days/week) (Labor Day thru 10/1: weekends only)	7 hours** (8:30 AM to 3:00 PM)

*Volume of water variable from year to year based on dry, normal, wet hydrologic conditions and associated whitewater boating flow requirements.

**Whitewater boating flows initiated at 8:00 AM due to model using hourly time-step.

***Schedule is based on Labor Day, so the number of days will vary year to year depending on when Labor Day occurs.

Using the existing operations model, GLHA compared the MEPRO-proposed whitewater boating flow schedule to the FLA-proposed whitewater boating flow schedule. The MEPRO scenario is the same as the FLA proposal scenario (including the minimum flow of 1,700 cfs from the Ripogenus Project) except for the proposed whitewater boating flow schedules. The modeling results indicate that although the MEPRO-proposed whitewater boating flow schedule uses less water (due to the reduced number of days and duration of flows per day), the results for the MEPRO proposal are very similar to the FLA proposal. The modeling results are enclosed.

Conclusions regarding MEPRO Whitewater Boating Flow Schedule

As indicated in Table 4 above, the MEPRO-proposed whitewater boating flow schedule includes fewer days and fewer hours per day as compared to the existing and GLHA-proposed whitewater boating flow schedules. Based on the fewer days and hours per day of whitewater boating flows, the MEPRO proposal requires less volume of water over the course of the whitewater boating season as compared to the existing and GLHA-proposed whitewater boating flow schedules. Based on the operations modeling results, the results for the GLHA-proposed whitewater boating flow schedule (FLA proposal) and the MEPRO-proposed whitewater boating flow schedule are very similar with no significant difference.

GLHA proposes to incorporate the MEPRO proposal for whitewater boating flows into the GLHA proposal, which will be further defined in a separate filing with FERC.

GLHA Response to MEPRO Infrastructure Improvement Requests

MEPRO Request: *McKay Station - consistent maintenance on the put-in ensures safe and adequate water access for recreational users. A representative from MEPRO could meet with Brookfield to ensure any updates and improvements are cost effective and sufficient for rafting use.*

GLHA Response: As indicated in the FLA, GLHA proposes to maintain the McKay Station Rafting Put-in Recreation for use during the boating season from May 1 to October 1. After the spring high flow events subside, GLHA will annually inspect the McKay Station Rafting Put-in and conduct as-needed maintenance to maintain usability of the put-in, in consultation with MEPRO. GLHA believes this proposal in the FLA is consistent with the MEPRO request.

MEPRO Request: *Debsconeag Road Improvements – improving the condition of the Debsconeag Road will enhance access to the river and facilitate put-in and take-out activities on this lower section. On high water releases (3,600+ cfs), we are unable to safely run Ripogenus Gorge or the Cribworks. Access to Debsconeag could mean we run this lower section during high water events.*

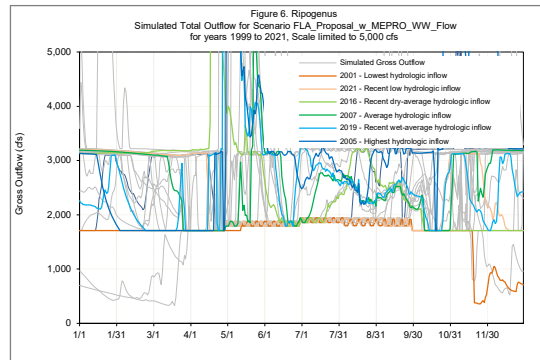
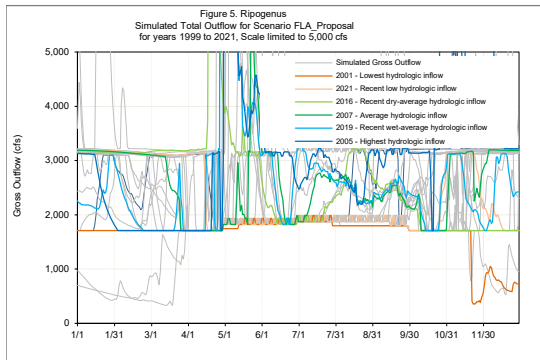
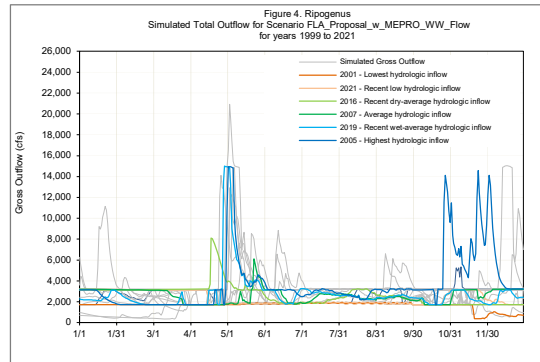
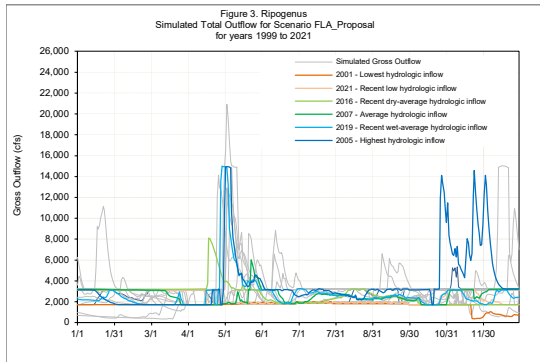
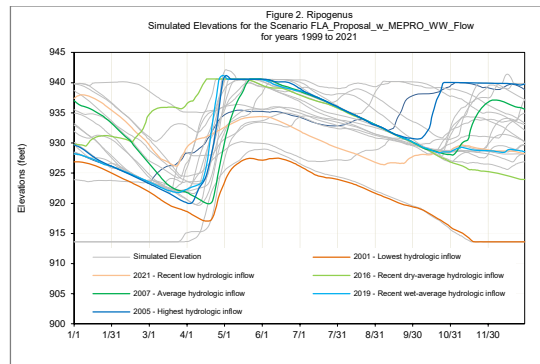
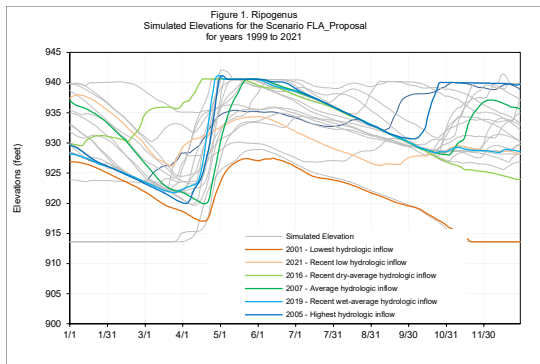
GLHA Response: As part of the Recreation Study completed during the relicensing proceeding, GLHA formed a Recreation Study Focus Group that evaluated existing recreation sites at the Projects as well as other areas not currently part of the Projects but of interest to recreation stakeholders. The Debsconeag Road and put-in site were one of the non-project areas that were evaluated by the Recreation Study Focus Group. The Debsconeag Road and put-in site are on lands not owned by GLHA and are located outside the FERC Project boundary. Therefore, GLHA has not adopted this request from MEPRO.

MEPRO Request: *Abol Bridge Access – the creation of a dedicated put-in and take-out at Abol Bridge would provide an alternative access point, enabling different water access during periods of extreme high or low water. This additional access point would offer greater flexibility for rafting operations and enhance public access to the river.*

GLHA Response: The Abol Bridge Access site is on land not owned by GLHA and is located outside the FERC Project boundary. Therefore, GLHA has not adopted this request from MEPRO.

Ripogenus Hydroelectric Project (FERC No. 2572) & Penobscot Mills Hydroelectric Project (FERC No. 2458)
Summary of Alternative Operating Scenario Requested by MEPRO

Scenario No.	Scenario Code Name in Model	Requestor	Project Area	Summary of Scenario Requested	GLHA Assumptions Related to Requested Scenario	Scenario Results Summary
27	FLA_Proposal_wMEPRO_WW_Flow	MEPRO	Ripogenus Whitewater Boating Flows	FLA_Proposal with the Ripogenus recreation flow schedule based on the January 22, 2026 MEPRO scenario request, as described below. Provide minimum boating flows downstream of McKay Station in accordance with the following schedule, subject to water availability. - May 1 – Friday Prior to Memorial Day (daily from 8:30 AM – 3:00 PM) - Normal hydrologic periods – 2,200 cfs (Mon/Fri), 2,000 cfs (Tue-Thu), and 2,300 cfs (Sat/Sun) - Dry hydrologic periods – 1,700 cfs (daily) - May 26 – Labor Day Weekend Sunday (daily from 8:30 AM – 3:00 PM) - Normal hydrologic periods – 2,200 cfs (Mon/Fri), 2,000 cfs (Tue-Thu), and 2,300 cfs (Sat/Sun) - Dry hydrologic periods – 2,000 cfs (Mon/Fri), 1,800 cfs (Tue-Thu), and 2,200 cfs (Sat/Sun) - Labor Day – October 1 (Sat & Sun from 8:30 AM – 3:00 PM) - Normal hydrologic periods – 2,300 cfs - Dry hydrologic periods – 2,200 cfs	- Assumed normal hydrologic condition boating flows are maintained during wet hydrologic condition periods. - Boating flows simulated as 8:00-3:00 PM as the model is hourly. - May 25th is assumed to define the “Friday Prior to Memorial Day” for the scenario. - September 7th is assumed to define the “Labor Day Weekend Sunday” and September 8th is assumed to define “Labor Day.”	- Overall results are very similar to the FLA proposal scenario. 0.02% loss in system total average annual generation from the FLA Proposal.



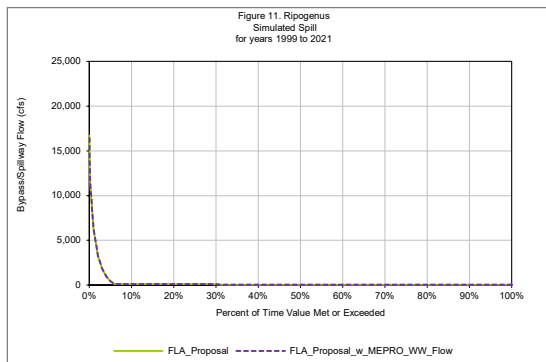
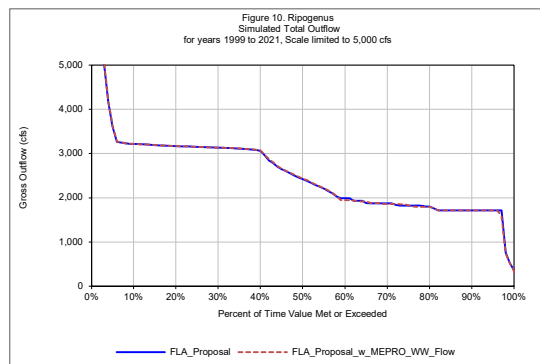
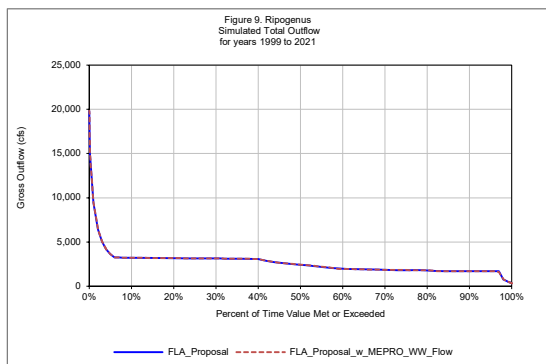
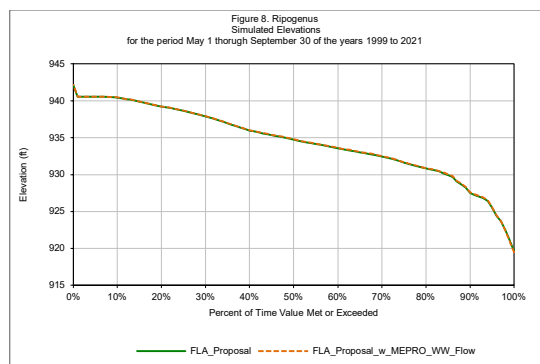
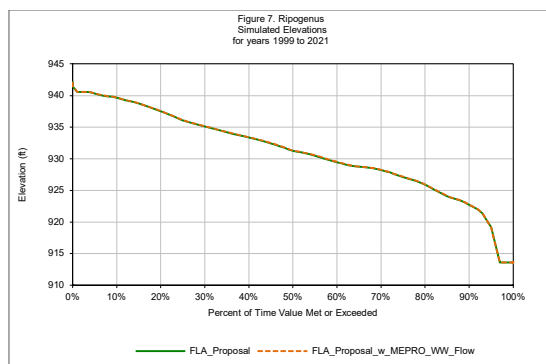


Table 1.

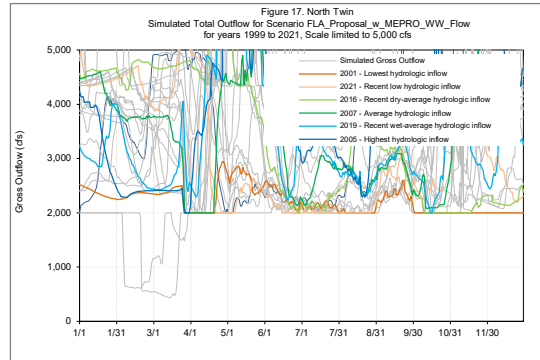
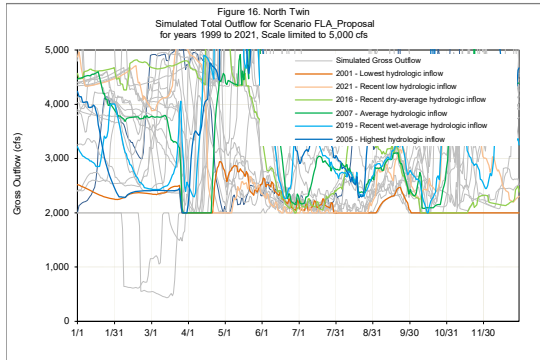
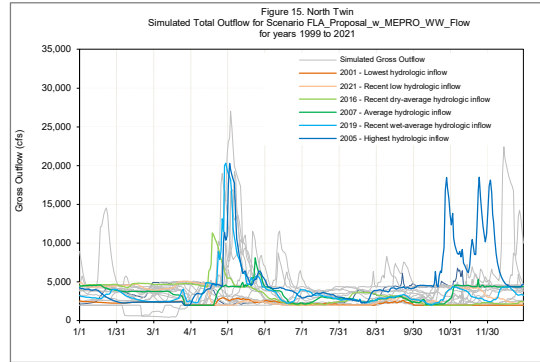
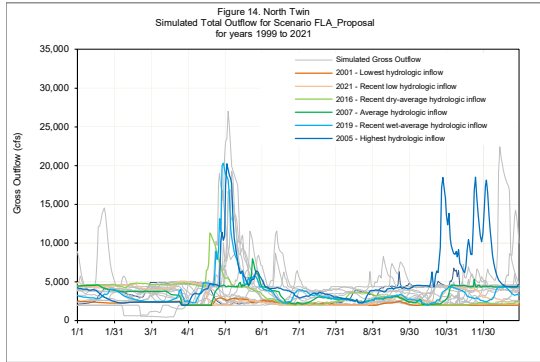
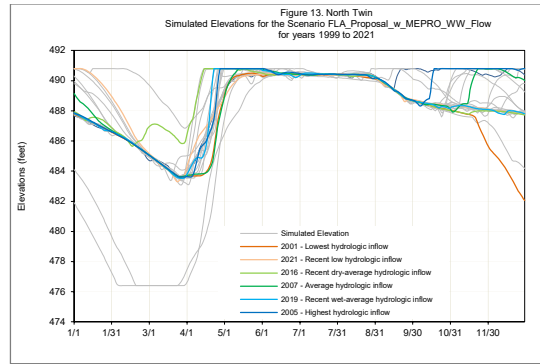
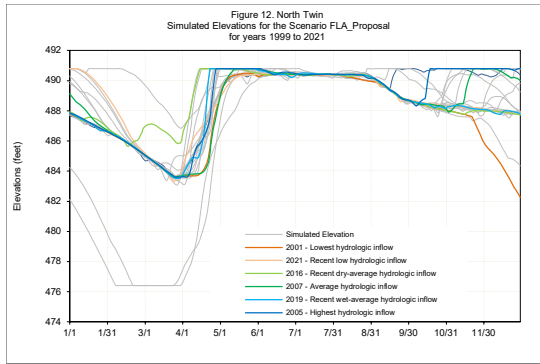
Ripogenus Monthly Average Days of Spill (Days) Scenarios simulated for 1999 - 2021				
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal	Percent difference from FLA_Proposal
January	1.17	1.17	0.00	-
February	0.35	0.35	0.00	-
March	0.00	0.00	0.00	-
April	0.87	0.87	0.00	-
May	10.00	10.09	0.09	0.01
June	2.74	2.74	0.00	-
July	0.26	0.26	0.00	-
August	0.00	0.00	0.00	-
September	1.35	1.35	0.00	-
October	0.39	0.39	0.00	-
November	1.91	1.91	0.00	-
December	2.35	2.35	0.00	-
Annual	21.39	21.48	0.09	0.00

Table 2.

Ripogenus Monthly Average Elevation Scenarios simulated for 1999 - 2021			
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal
January	929.9	929.9	0.0
February	927.0	927.0	0.0
March	924.4	924.4	0.0
April	927.3	927.3	0.0
May	936.5	936.5	0.0
June	936.7	936.8	0.0
July	934.9	934.9	0.0
August	933.0	933.1	0.0
September	931.3	931.3	0.0
October	929.8	929.8	0.0
November	930.6	930.6	0.0
December	931.1	931.1	0.0
Annual	931.0	931.1	0.0

FLA_Proposal simulated Ripogenus total outflow of less than 1,000 cfs for 210 days in the period of record, 1999 - 2021.

FLA_Proposal_w_MEPRO_WW_Flow simulated Ripogenus total outflow of less than 1,000 cfs for 213 days in the period of record. Approximately 3 more days than the FLA_Proposal scenario.



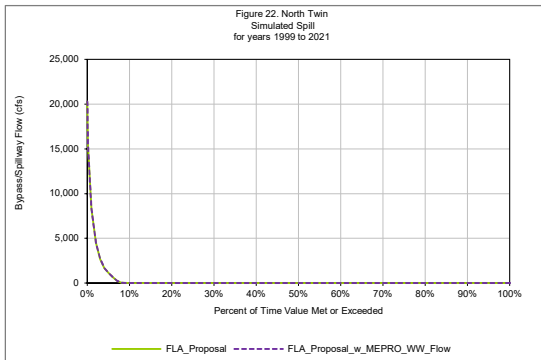
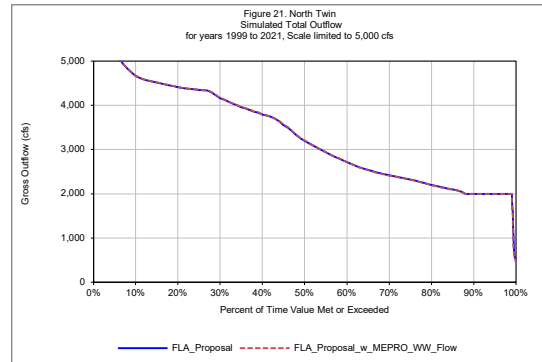
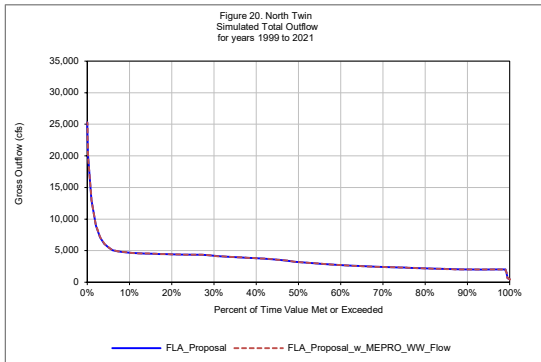
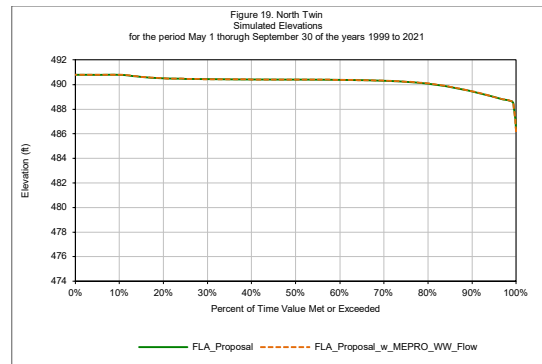
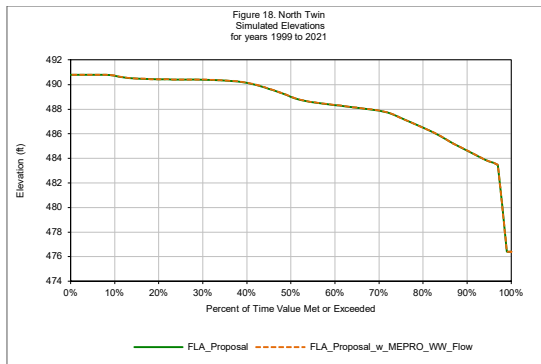


Table 3.

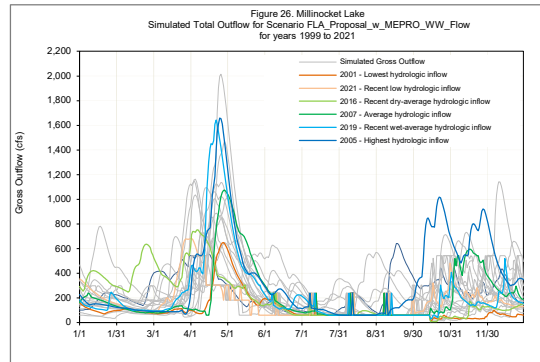
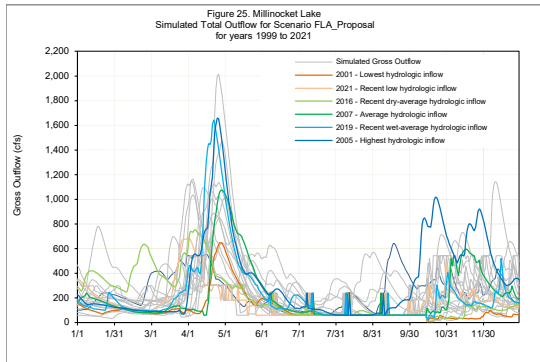
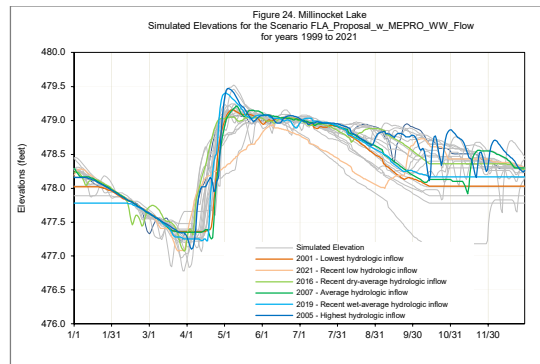
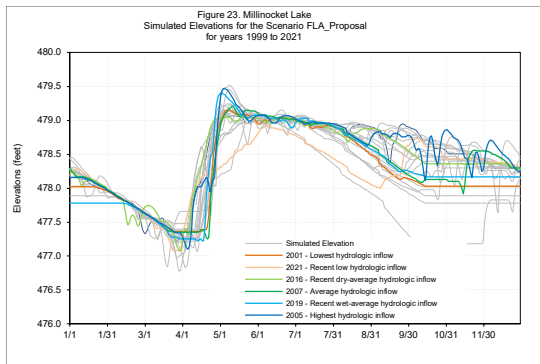
North Twin Monthly Average Days of Spill (Days) Scenarios simulated for 1999 - 2021				
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal	Percent difference from FLA_Proposal
January	1.48	1.48	0.00	-
February	0.35	0.35	0.00	-
March	0.00	0.00	0.00	-
April	2.30	2.30	0.00	-
May	12.00	12.00	0.00	-
June	2.39	2.39	0.00	-
July	0.26	0.26	0.00	-
August	0.13	0.13	0.00	-
September	1.65	1.65	0.00	-
October	1.26	1.26	0.00	-
November	3.74	3.78	0.04	1.2%
December	4.04	4.04	0.00	-
Annual	29.61	29.65	0.04	0.1%

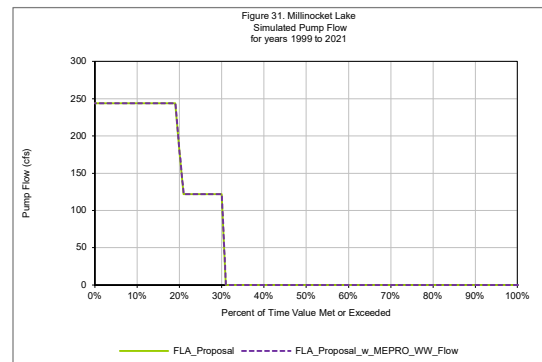
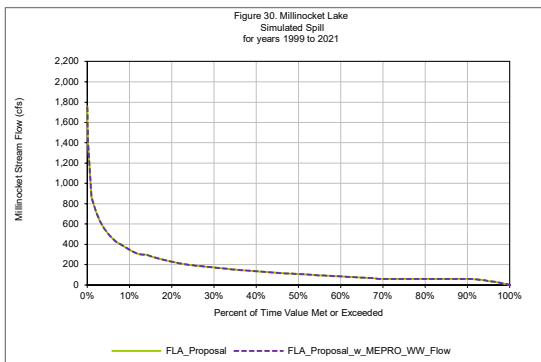
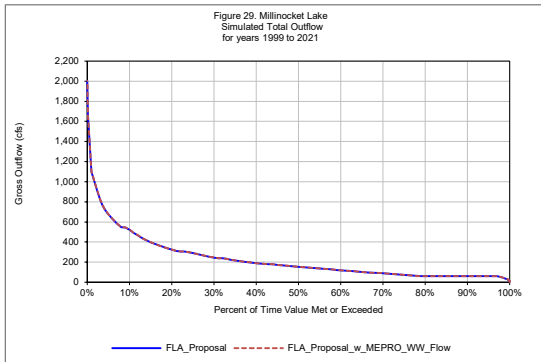
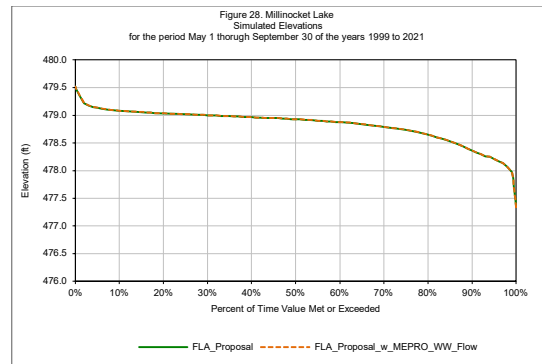
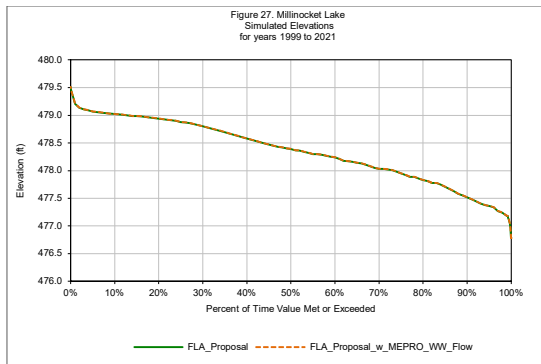
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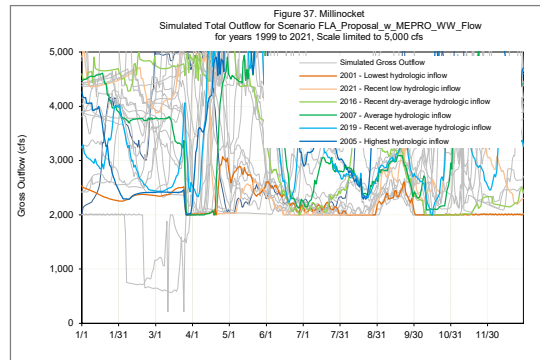
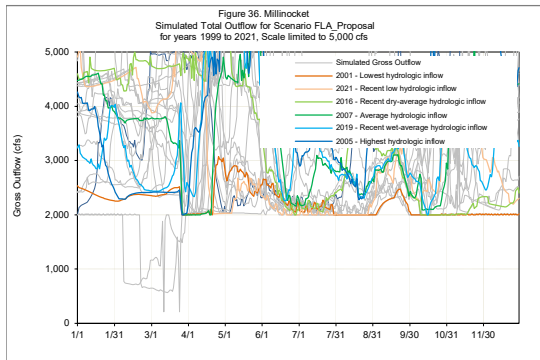
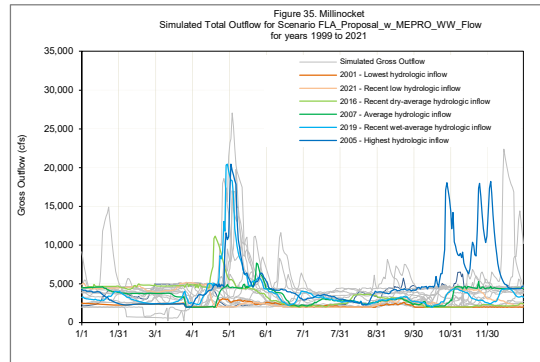
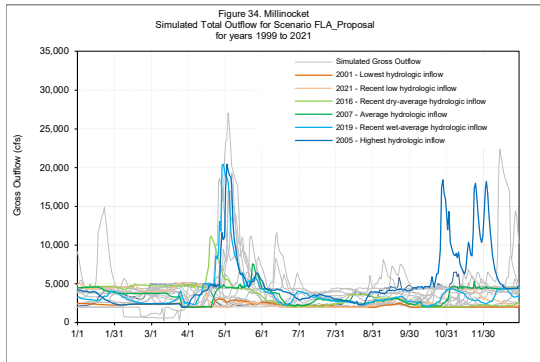
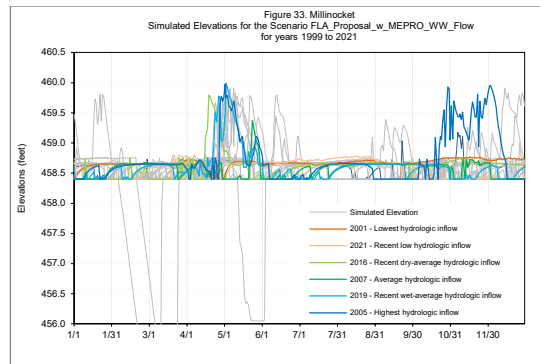
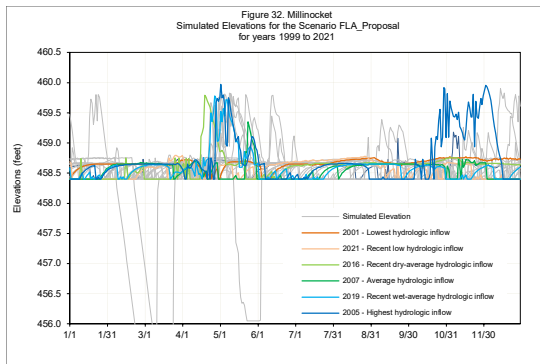
North Twin Monthly Average Elevation Scenarios simulated for 1999 - 2021			
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January	487.4	487.4	0.0
February	485.5	485.5	0.0
March	483.9	483.9	0.0
April	486.1	486.1	0.0
May	490.4	490.4	0.0
June	490.5	490.5	0.0
July	490.4	490.4	0.0
August	490.4	490.4	0.0
September	489.6	489.6	0.0
October	488.7	488.7	0.0
November	488.8	488.8	0.0
December	488.6	488.6	0.0
Annual	488.4	488.4	0.0

FLA_Proposal simulated North Twin total outflow of less than 1,000 cfs for 50 days in the period of record, 1999 - 2021.

FLA_Proposal_w_MEPRO_WW_Flow simulated North Twin total outflow of less than 1,000 cfs for 52 days in the period of record. Approximately 2 more days than the FLA_Proposal scenario.







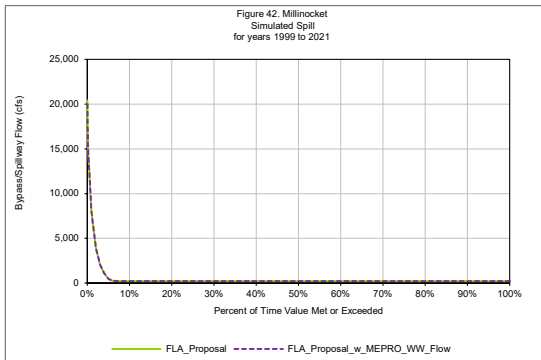
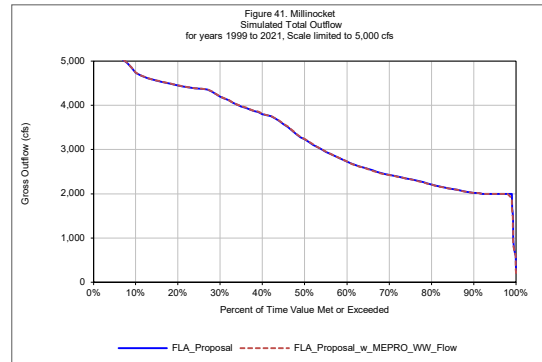
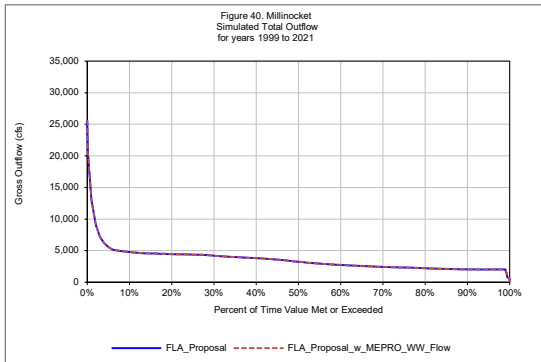
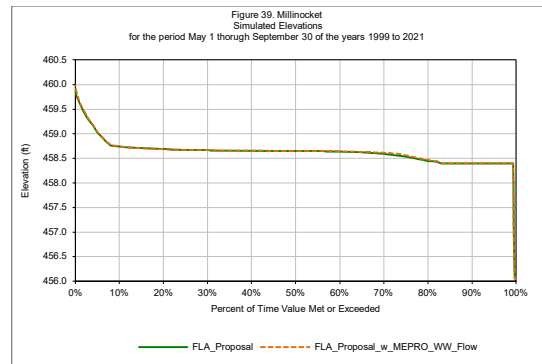
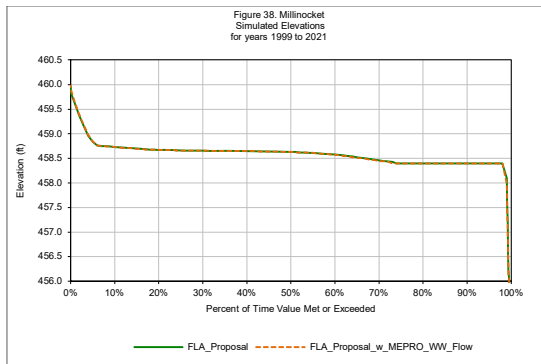


Table 5.

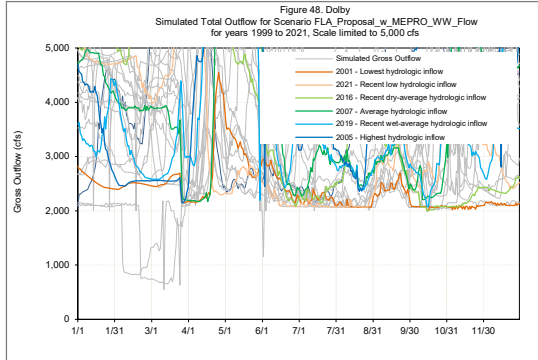
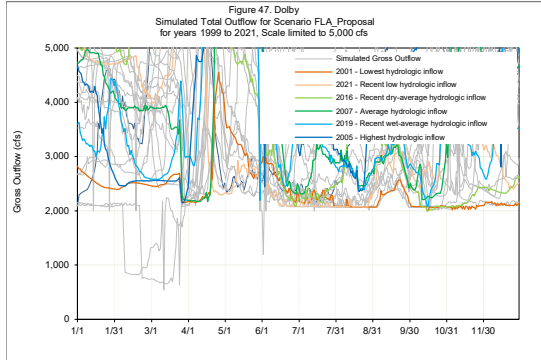
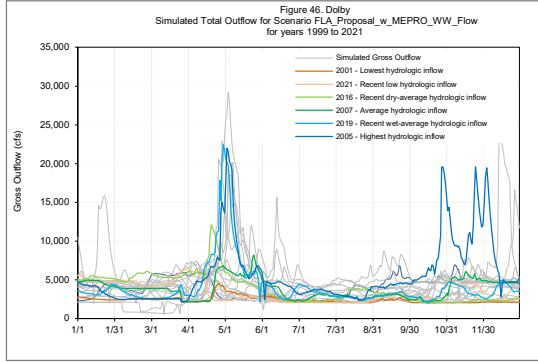
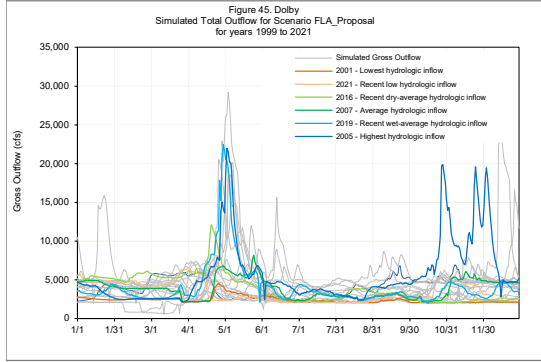
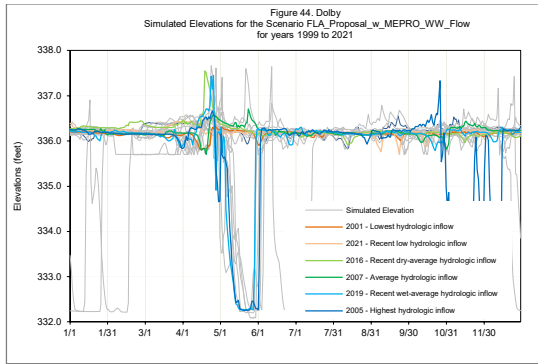
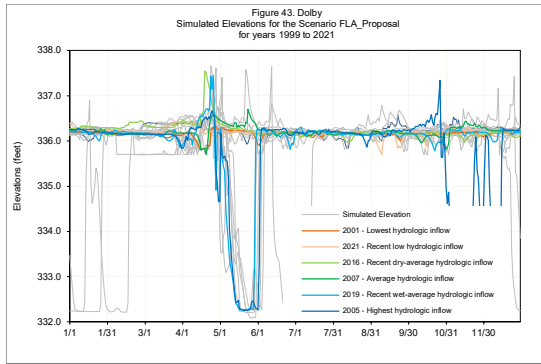
Millinocket Monthly Average Days of Spill (Days) Scenarios simulated for 1999 - 2021				
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal	Percent difference from FLA_Proposal
January	1.22	1.22	0.00	-
February	0.26	0.26	0.00	-
March	1.17	1.17	0.00	-
April	3.61	3.61	0.00	-
May	10.09	10.22	0.13	1.3%
June	1.65	1.65	0.00	-
July	0.22	0.22	0.00	-
August	0.09	0.09	0.00	-
September	1.39	1.39	0.00	-
October	0.70	0.70	0.00	-
November	2.74	2.74	0.00	-
December	2.91	2.91	0.00	-
Annual	26.04	26.17	0.13	0.5%

Table 6.

Millinocket Monthly Average Elevation Scenarios simulated for 1999 - 2021			
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal
January	458.6	458.6	0.0
February	458.5	458.5	0.0
March	458.4	458.4	0.0
April	458.6	458.6	0.0
May	458.7	458.7	0.0
June	458.6	458.6	0.0
July	458.6	458.6	0.0
August	458.6	458.6	0.0
September	458.6	458.6	0.0
October	458.6	458.6	0.0
November	458.6	458.6	0.0
December	458.6	458.6	0.0
Annual	458.6	458.6	0.0

FLA_Proposal simulated Millinocket total outflow of less than 1,000 cfs for 53 days in the period of record, 1999 - 2021.

FLA_Proposal_w_MEPRO_WW_Flow simulated Millinocket total outflow of less than 1,000 cfs for 55 days in the period of record. Approximately 2 more days than the FLA_Proposal scenario.



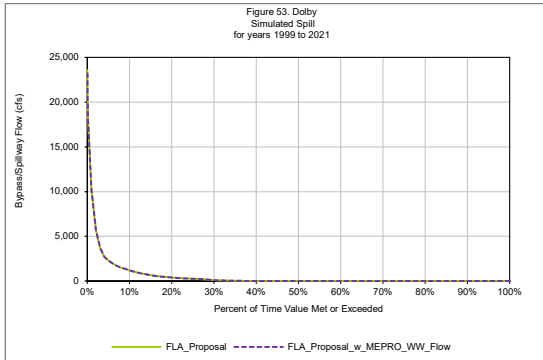
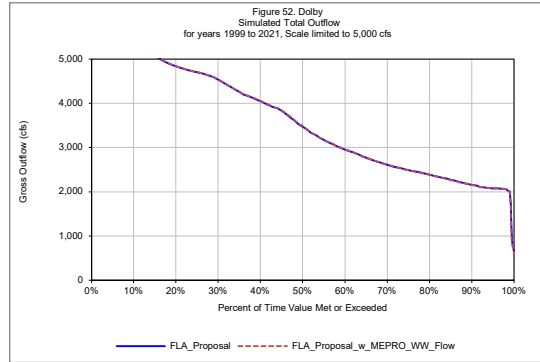
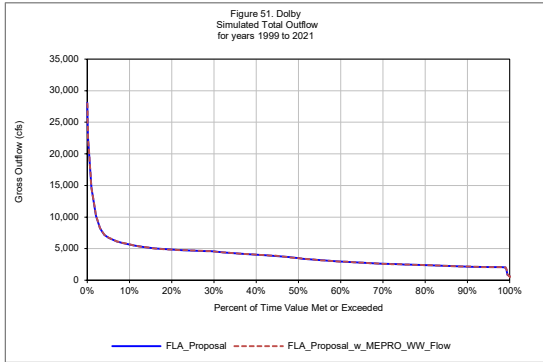
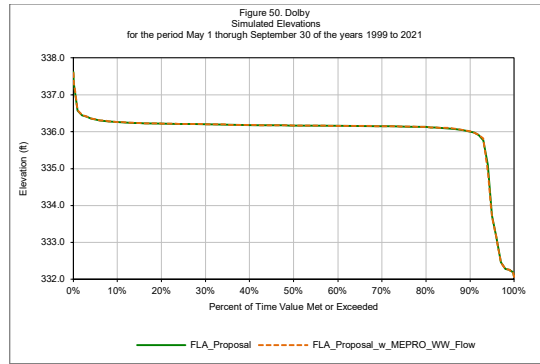
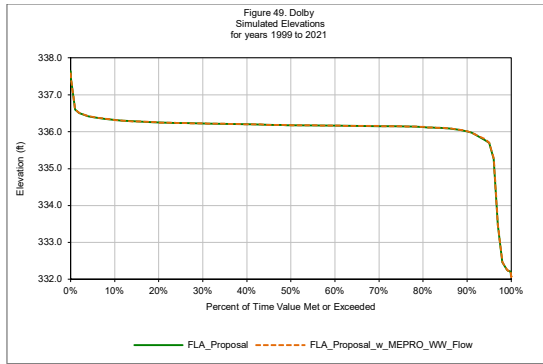


Table 7.

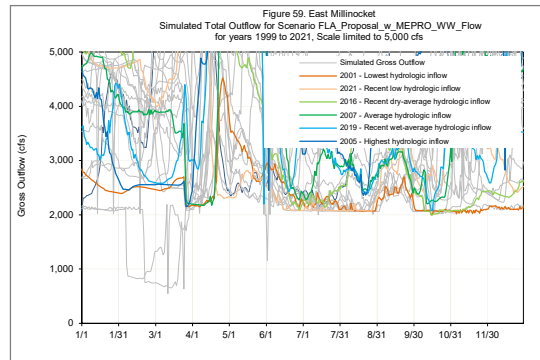
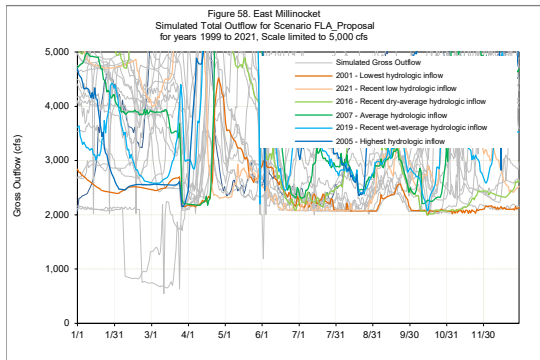
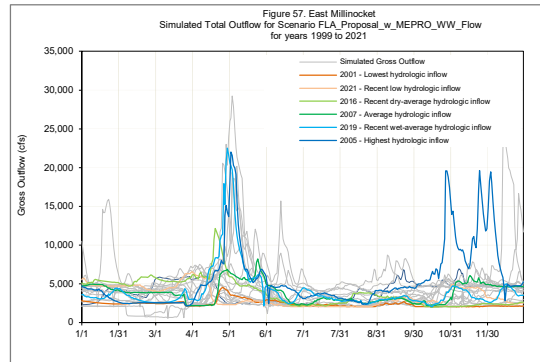
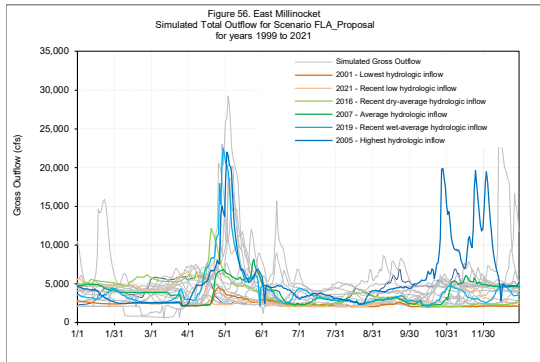
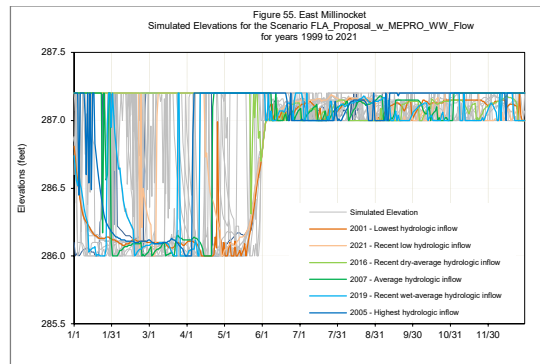
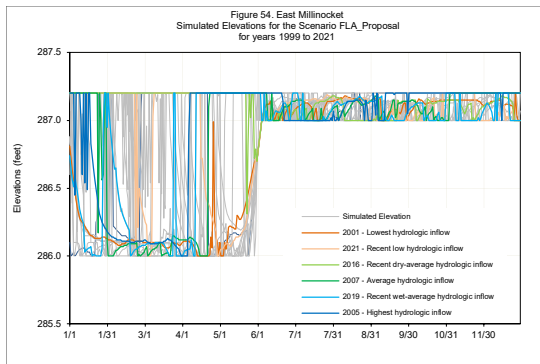
Dolby Monthly Average Days of Spill (Days) Scenarios simulated for 1999 - 2021				
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal	Percent difference from FLA_Proposal
January	17.65	17.65	0.00	-
February	10.91	10.91	0.00	-
March	14.74	14.74	0.00	-
April	17.26	17.26	0.00	-
May	17.52	17.52	0.00	-
June	7.04	7.04	0.00	-
July	2.91	2.91	0.00	-
August	3.57	3.57	0.00	-
September	4.57	4.74	0.17	3.8%
October	9.35	9.35	0.00	-
November	16.22	16.22	0.00	-
December	18.48	18.48	0.00	-
Annual	140.22	140.39	0.17	0.1%

Table 8.

Dolby Monthly Average Elevation Scenarios simulated for 1999 - 2021			
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal
January	336.0	336.0	0.0
February	336.1	336.1	0.0
March	336.2	336.2	0.0
April	336.3	336.3	0.0
May	335.5	335.5	0.0
June	336.0	336.0	0.0
July	336.1	336.1	0.0
August	336.2	336.2	0.0
September	336.2	336.2	0.0
October	336.2	336.2	0.0
November	336.1	336.1	0.0
December	336.1	336.1	0.0
Annual	336.1	336.1	0.0

FLA_Proposal simulated Dolby total outflow of less than 1,000 cfs for 48 days in the period of record, 1999 - 2021.

FLA_Proposal_w_MEPRO_WW_Flow simulated Dolby total outflow of less than 1,000 cfs for 50 days in the period of record. Approximately 2 more days than the FLA_Proposal scenario.



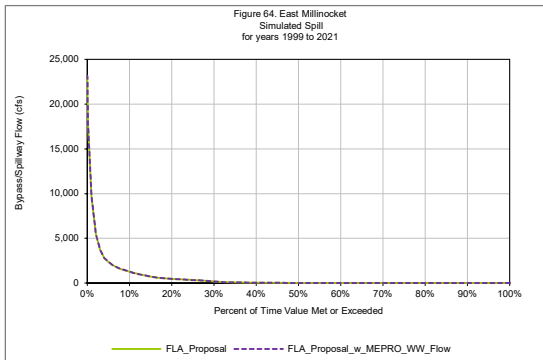
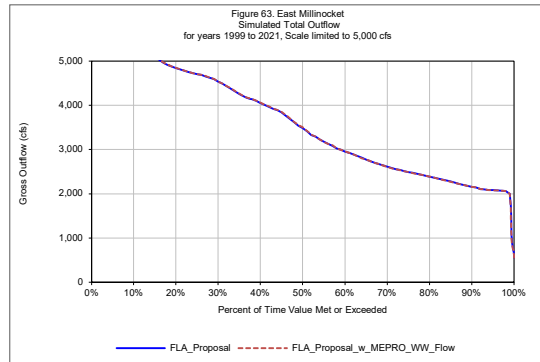
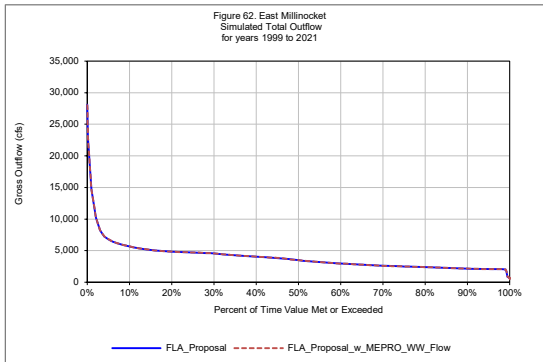
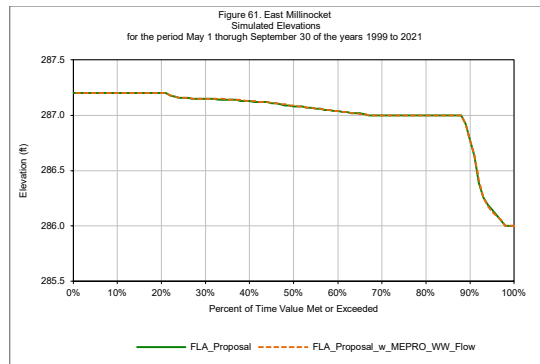
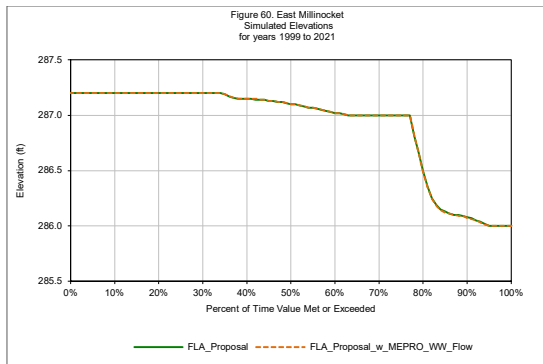


Table 9.

East Millinocket Monthly Average Days of Spill (Days) Scenarios simulated for 1999 - 2021				
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal	Percent difference from FLA_Proposal
January	15.91	15.91	0.00	-
February	9.22	9.17	-0.04	-0.5%
March	12.74	12.74	0.00	-
April	16.57	16.61	0.04	0.3%
May	16.70	16.74	0.04	0.3%
June	11.39	11.35	-0.04	-0.4%
July	10.52	10.43	-0.09	-0.8%
August	9.00	8.87	-0.13	-1.4%
September	14.83	15.17	0.35	2.3%
October	14.43	14.48	0.04	0.3%
November	20.96	21.00	0.04	0.2%
December	22.30	22.35	0.04	0.2%
Annual	174.57	174.83	0.26	0.1%

Table 10.

East Millinocket Monthly Average Elevation Scenarios simulated for 1999 - 2021			
Month	FLA_Proposal	FLA_Proposal_w_MEPRO	Difference from FLA_Proposal
January	286.7	286.7	0.0
February	286.5	286.5	0.0
March	286.6	286.5	0.0
April	286.7	286.7	0.0
May	286.7	286.7	0.0
June	287.1	287.1	0.0
July	287.1	287.1	0.0
August	287.1	287.1	0.0
September	287.1	287.1	0.0
October	287.1	287.1	0.0
November	287.1	287.1	0.0
December	287.1	287.1	0.0
Annual	286.9	286.9	0.0

FLA_Proposal simulated East Millinocket total outflow of less than 1,000 cfs for 48 days in the period of record, 1999 - 2021.

FLA_Proposal_w_MEPRO_WW_Flow simulated East Millinocket total outflow of less than 1,000 cfs for 50 days in the period of record. Approximately 2 more days than the FLA_Proposal scenario.

