Brookfield
Renewable N.A.

November 6, 2026

Brunswick Project
FERC No. 2284-053

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Subject: Additional Information Request

Dear Secretary Reese:

Brookfield White Pine Hydro LLC (BWPH) is the licensee for the Brunswick Project (FERC No. 2284). On October 28, 2026 the Federal Energy Regulatory Commission (Commission) requested additional information regarding reports of a recent fish mortality event at the Project.

Specifically, the Commission requested: (1) the operational status of the downstream fish passage facility during the time surrounding the incident; (2) project operations before, during, and after the incident, including any operational difficulties or abnormal river conditions; (3) observations regarding the fish kill and BWPH's conclusions concerning the cause of the event; (4) actions taken upon learning of the incident; and (5) consultation with state and federal resource agencies. BWPH herein submits the following response to the Commission's request.

Background and Project Operations

The Brunswick Project is located on the Androscoggin River at the head-of-tide, at approximately river mile (RM) 6 in the towns of Brunswick and Topsham, Maine. Sabattus Pond is a nearly 2,000 acre lake located on the Sabattus River, an 11.4-mile long tributary of the Androscoggin River. The Sabattus River enters the Androscoggin River at approximately RM 16.2, above the Worumbo Project (FERC No. 4784), which is located at RM 14.1. The Maine Department of Marine Resources (MDMR) annually captures adult river herring at the Brunswick Project fishway and transports them to Sabattus Pond, the largest river herring spawning lake within the Androscoggin River watershed.

The Commission investigated prior reports of a similar fish mortality event at the Brunswick Project that occurred on or about October 15–16, 2016. BWPH filed responses on November 7 and December 8, 2016, with the Commission providing a determination letter on January 3, 2017. The 2016 event was attributed to juvenile river herring out-migrating from Sabattus Pond when the lake association began its annual lake drawdown.

Based on this 2016 event, BWPH developed a revised downstream fish passage protocol that combines enhanced daytime monitoring of the tailrace with dusk-to-dawn project turbine shutdowns during periods when juvenile river herring are believed to be moving out of Sebattus Pond. (Out-migrating river herring, it should be noted, are believed to follow pulses of flow downstream and as such may pass projects during either day or night.)

If the daylight monitoring observes an increase in mortality, the Brunswick station moves to a 24-hour shutdown until the majority of river herring have passed the project. During these project shutdowns out-migrating fish are able to pass via the existing downstream passage as well as over the Project spillway. Further, as recommended by the Commission, in 2017 BWPH engaged the Sabattus lake association, which now notifies BWPH of its fall drawdowns. Based on this revised downstream fish passage protocol, no significant mortality events were observed

BROOKFIELD WHITE PINE HYDRO LLC
460 Civic Center Drive, Augusta, ME 04330
T +1 207.755.5600 F +1 207.755.5655 brookfieldrenewableNA.com

from 2017 to 2025.

On October 9, 2026, BWPH was notified that the Sabattus Lake Dam had been opened to facilitate its annual drawdown, resulting in the release of large numbers of juvenile river herring from Sabattus Pond. Based on information collected that day, BWPH implemented its established downstream fish passage protocol and initiated nighttime turbine shutdowns targeting the dusk-to-dawn migration period (approximately 7:00p.m. to 7:00a.m.) beginning the evening of October 9.

At approximately 10:30 a.m. on October 10, 2026, a BWPH fisheries technician observed a small number of dead juvenile river herring in the Brunswick Project tailrace. At the time, the Project was located within an area classified as experiencing Extreme Drought (D3) conditions, and river flows were unusually low, averaging approximately 1,430 cubic feet per second (cfs). Due to the low flow conditions, only one to two small generating units were operating intermittently during daytime hours.

BWPH fisheries personnel closely monitored fish passage conditions throughout the day. At approximately 2:00 p.m., technicians observed a noticeable increase in juvenile river herring mortalities. In response, BWPH immediately shut down the remaining operating unit, allowing all river flow to pass via spill in accordance with the Project's fish passage protection measures. The complete station shutdown continued throughout the weekend until Wednesday, October 15th to maximize safe downstream passage opportunities for out-migrating juvenile herring.

Downstream Fish Passage Facility Status

The downstream fish passage facility remained available and operational throughout the period surrounding the incident. No operational issues or deficiencies affecting fish passage were identified. BWPH observed no mechanical failures, blockages, or abnormal conditions associated with the fish passage facility during this period.

Fish Kill Observations and Probable Cause

As with the 2016 event, the juvenile river herring encountered at the Brunswick Project in 2026 are believed to have originated from Sabattus Lake following the annual lake drawdown initiated on October 9, 2026. In accordance with an established notification protocol, BWPH was notified of the drawdown by a local public works official on October 9 and subsequently implemented its nighttime shutdown protocol.

MDMR reported that a total of 10,847 adult river herring were stocked in Sabattus Lake, Little Sabattus Pond, No Name Pond, and the Sabattus River in 2026. An additional 29,654 adult river herring were passed upstream into the mainstem Androscoggin River above the Brunswick Project. MDMR further estimated that approximately 8.52 million juvenile river herring would out-migrate from the Sabattus Lake system via the Sabattus River and migrate through the Brunswick Project during the 2026 outmigration season.

BWPH believes that prolonged drought conditions and below-normal precipitation resulted in significantly fewer spill events at the Sabattus Lake Dam throughout the summer and early fall. Under more typical hydrologic conditions, juvenile river herring would be expected to leave the lake gradually during periodic spill events over an extended migration period. However, due to the lack of natural spill opportunities in 2026, MDMR believes that a substantial portion of the

juvenile river herring population remained in the lake until the annual drawdown commenced, resulting in a concentrated downstream migration event beginning on October 9, 2026.

Based on observations collected by BWPH and discussions with resource agencies, BWPH believes the juvenile river herring mortalities observed on October 10, 2026, were associated with a highly unusual combination of circumstances, including: (1) the annual drawdown release from Sabattus Lake; (2) an exceptionally large concentration of juvenile river herring migrating downstream over a short period; and (3) persistent drought and low-flow conditions throughout the watershed.

BWPH documented approximately 1,500 juvenile river herring mortalities, while the Free the Andro Coalition (FTAC) estimated approximately 3,000 mortalities. Based on the estimate of 8.52 million out-migrating juvenile river herring originating from the Sabattus Lake system and passing the Brunswick Project via the Sabattus River, the estimated mortality represents approximately 0.035% of the anticipated migration population.

Immediate Actions Taken

Upon observing fish mortalities, BWPH immediately implemented additional operational measures intended to improve downstream fish passage conditions and minimize the potential for further impacts. Specifically, BWPH shut down the remaining operating unit and allowed all river flow to pass via spill. Daytime and nighttime turbine shutdowns were maintained throughout the peak migration period to provide maximum passage opportunities for juvenile river herring.

BWPH also conducted intensive monitoring of the Project tailrace and downstream shoreline areas to assess the scope of the event and evaluate the effectiveness of the operational response.

Agency Consultation and Monitoring

BWPH promptly communicated with state and federal resource agencies on Saturday, October 10th regarding the event and continued providing updates through its weekly fish passage reporting process. BWPH fisheries personnel conducted daily shoreline and turbine discharge surveys from October 10 through October 19, 2026. No new shoreline or turbine discharge mortalities were observed during this period.

Additional periodic shoreline and turbine discharge surveys have been completed daily by the fisheries technician operating the upstream fish passage. No additional mortalities have been observed to date.

Conclusion

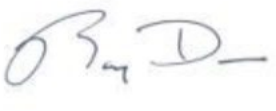
BWPH will continue monitoring the Project and downstream areas for an additional two-week period and will continue providing weekly fish passage reports to resource agencies. BWPH believes the actions implemented before and after the event were timely, appropriate, and effective in minimizing further fish mortality and protecting downstream-migrating juvenile river herring.

Please contact me at (207) 755-5605 or at randy.dorman@brookfieldrenewable.com with any questions.

BROOKFIELD WHITE PINE HYDRO LLC
460 Civic Center Drive, Augusta, ME 04330
T +1 207.755.5600 F +1 207.755.5655 brookfieldrenewableNA.com

Brookfield
Renewable N.A.

Sincerely,



Randall Dorman
Senior Compliance Manager – New England and Rest of Country (LA, NC, and TN)

Attachments: BWPH and resource agency correspondence on October 10, 2026
Herring data provided by MDMR via email correspondence on October 28, 2026

Cc: A. Brown, K. Lesure, M. LeBeau, D. Heidrich, K. Pocquette, T. Mapletoft, J. Seyfried, P. McDonough; BWPH

Town of Sabattus
Sabattus Lake Association

L. Paye; MDEP
M. Buhyoff, D. Dow; NMFS
J. Pellerin, J. Perry; MDIFW
C. Clark; M. Brown; MDMR
P. Dockens, K. Spiller; USFWS

SharePoint: 2284|01

BROOKFIELD WHITE PINE HYDRO LLC
460 Civic Center Drive, Augusta, ME 04330
T +1 207.755.5600 F +1 207.755.5655 brookfieldrenewableNA.com

Document Accession #: 20261106-5077 Filed Date: 11/06/2026

From:	Brown, Adam
To:	"donald.dow@noaa.gov"; "Matt Buhyoff - NOAA Federal"; Clark, Casey; Dockens, Patrick E; kimberly_spiller; Perry, John; Paye, Laura
Cc:	Dorman, Randy; Lesure, Kevin; LeBeau, Michael; Seyfried, Jason; Pocquette, Kayla; Heidrich, David; Scarzello, Michael
Subject:	Brunswick Project Juvenal Herring
Date:	Saturday, October 10, 2026 2:35:41 PM
Attachments:	image001.jpg

On October 9, 2026, Brookfield was notified that the Sabattus Lake dam had been opened for its annual drawdown, allowing large amounts of juvenal herring to exit the lake. With this information Brookfield initiated nighttime shutdowns at the Brunswick Project to aid in the safe passage of the juvenile herring.

Around 10:30 am on October 10, a Brookfield fisheries technician noticed a small number of dead juvenile herring in the tailrace. Currently Brunswick is in an Extreme Drought (D3) area and total river flows are very low (around 1,430 cfs). The station is only operating with one small unit during the day, and Brookfield fisheries technicians will closely monitor the situation. Should the technicians observe a significant increase in mortalities we will shut down the last unit and allow all water to spill, just as with the nighttime shutdown protocol.

Adam Brown
Compliance Specialist | NEROC Compliance

C 207-313-1173
adam.brown@brookfieldrenewable.com



View important disclosures and information about our e-mail policies **here.**

From: Brown, Adam
To: Dorman, Randy; Seyfried, Jason
Subject: FW: Question on Sabattus Stocking
Date: Wednesday, October 28, 2026 10:43:07 AM
Attachments: image001.jpg

From: Brown, Michael <Michael.Brown@maine.gov>
Sent: Wednesday, October 28, 2026 10:35 AM
To: Brown, Adam <Adam.Brown@brookfieldrenewable.com>
Subject: RE: Question on Sabattus Stocking

***** CAUTION! EXTERNAL SENDER *** STOP. ASSESS. VERIFY!: DO NOT CLICK ON LINKS, OPEN, OR PREVIEW ATTACHMENTS UNLESS YOU KNOW THE CONTENT IS SAFE. If suspicious, report the email using the Phish Alert button. * ATTENTION ! EXPÉDITEUR EXTERNE *** ARRÊTEZ. ÉVALUEZ. VÉRIFIEZ ! : NE CLIQUEZ PAS SUR LES LIENS, N'OUVREZ PAS ET NE PRÉVISUALISEZ PAS LES PIÈCES JOINTES À MOINS DE SAVOIR QUE LE CONTENU EST SÉCURISÉ. Si vous recevez un courriel suspect, veuillez utiliser le bouton Phish Alert.**

Adam,

A total of 10,847 were stocked in combination (Sabattus Pond, Little Sabattus, No Name Pond and Sabattus River). The main stem Andro received 29,654 additional fish.

Based on stocking Sabattus, Sabattus River below the dam, Little Sabattus, No Name Pond we expect 8.52 million juvenile fish to leave via the Sabattus River. This does not include any fish produced in the headponds.

If Daves sees any going downstream through the upstream fishway please have him save us a 50 fish sample.

Thanks,
Mike

From: Brown, Adam <Adam.Brown@brookfieldrenewable.com>
Sent: Wednesday, October 28, 2026 10:15 AM
To: Pasterczyk, Mark <Mark.Pasterczyk@maine.gov>; Brown, Michael <Michael.Brown@maine.gov>
Subject: Question on Sabattus Stocking

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi guys, I have a couple quick question for you. Can you confirm how many herring were stocked into the Sabattus drainage this season? I believe Mark had said 9,000 into Sabattus Lake, and maybe another 1,500 into Little Sabattus or No Name Pd and was unsure about Sabattus Stream? And from those stocking efforts how many juveniles could we expect to see moving downstream?

Thank you,

Adam Brown
Compliance Specialist | NEROC Compliance

C 207-313-1173
adam.brown@brookfieldrenewable.com



View important disclosures and information about our e-mail policies **here.**

Document Content(s)

20261106 To FERC Brunswick Fish Kill AIR Response.pdf 1