



September 12, 2025

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223-1350

**Re: Ogdensburg Hydro Project (FERC No. P-9821) Application for Maintenance Tier 2**

Ampersand Ogdensburg Hydro LLC (AOH) is seeking maintenance RECs due to financial hardship. The Ogdensburg Hydro project (the "Project") is a 3 MW run-of-river hydroelectric power generating station located in the City of Ogdensburg, New York. The purpose of the Project is to generate zero-emission hydroelectric power for sale to a utility at market price. The Project, originally licensed and commercialized in 1987, was purchased by AOH in 2015; since then, the Project has been operated as a run-of-river, providing clean energy to the state of New York.

The Project is outfitted with three floodgates that are operated for flood control. The floodgates are essential to the safe operation of the project, given its urban location, in close proximity to the City of Ogdensburg's marina. Per its license, AOH is required to maintain and keep the three floodgates operational. Between 2018 and 2019, AOH experienced repeat failures of all three actuators, resulting in over \$70,000 of repairs. The actuators were all replaced by 2020. However, in a 2023 post-inspection letter, AOH was required by the Federal Regulatory Commission to electrify all three gates to enable remote control operation (until then, two of the gates were operated manually with the use of a mechanical drill – only one floodgate was electrified and operated with a remote). Unfortunately, neither of the two manually operated actuators, replaced between 2019 and 2020, was suitable for electrification and automation, according to the manufacturer. In this respect, AOH was left with the only option to remove these actuators and order new ones suitable for electrification and automation. This latest development is to be added to the series of setbacks and major outage events experienced by the Project,

resulting in financial hardship. Between 2023 and 2024, the Project has experienced three major flooding events in the powerhouse (each of these events required week long professional clean-ups); this was compounded with a series of extended outages owed to mechanical failures in four of its units since 2023 - (one of the units was successfully brought back online in 2025). The combination of all of these events has challenged the ability of the plant to generate revenues and led to significant capital expenditures. In this context, the sunk costs associated with the manual actuators (purchased in 2019/2020) and the need to order new actuators have further exacerbated the financial hardship. AOH is requesting a \$56.4/MWh Maintenance REC for a 10-year term.

We have filed with the Records Assess Officer non-redacted versions of the documents here attached to the filing.

- i) Financial Statements (2022, 2023, and 2024),
- ii) School Tax Statements (2022-2023, 2023-2024, and 2024-2025)
- iii) Pro forma document (in compliance with Staff template)
- iv) Purchase order for repairs

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