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October 11, 2011

Mr. David Webster, Chief  
Office of Ecosystem Protection  
United States Environmental Protection Agency ("EPA")  
NPDES Industrial Permit Branch (CIP)  
5 Post Office Square - Suite 100, OEP06-1  
Boston, MA 02109-3912

Dear Mr. Webster:

I and colleagues at NERA Economic Consulting ("NERA") will be assisting the Public Service Company of New Hampshire ("PSNH") in the evaluation of materials related to the draft National Pollutant Discharge Elimination System permit ("draft permit") recently issued by the EPA for the Merrimack Station power plant in Bow, New Hampshire. I am writing to request an extension of 90 days of the Public Notice period that currently ends on November 30, 2011.

The draft permit raises many complicated issues that will require considerable time to evaluate. Moreover, we expect that our evaluations will involve working with other experts as well as officials at PSNH, interactions that are critical to our analyses and that necessarily involve calendar time. We believe that an extension of the Public Notice period will allow NERA to provide a more complete assessment and thus provide superior information to you and others.

Thank you for your time and consideration of our request. Please let me know if you have any questions regarding our request or if there is any other information I can provide.

Sincerely yours,



David Harrison, Jr., Ph.D.  
Senior Vice President

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