



AR-1362

780 N. Commercial Street
P.O. Box 330
Manchester, NH 03105-0330

Linda T. Landis
Senior Counsel,
Legal Department
603-634-2700

Linda.Landis@eversource.com

April 20, 2017

Mr. Mark A. Stein, Esq.
Senior Assistant Regional Counsel
U.S. Environmental Protection Agency – Region 1
Office of Regional Counsel, Region 1
5 Post Office Square, Suite 100 (CIP)
Boston, Massachusetts 02109-3912

**RE: Public Service Company of New Hampshire
Merrimack Station, Bow, New Hampshire
Draft NPDES Permit No. NH0001465**

Dear Attorney Stein:

On February 17, 2017, Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") submitted a plan to the Environmental Protection Agency, Region 1 ("EPA") describing how Merrimack Station would comply with the requirements set out in the Effluent Limitations Guidelines for the Steam Electric Power Plant industrial category ("ELG Rule") related to the handling of bottom ash transport water. PSNH's compliance plan included a tentative schedule which targeted a completion date of 2022 subject to a number of factors, including the pending divestiture of Merrimack Station. However, PSNH did not factor in the highly significant decision on April 14, 2017, by the EPA Administrator to stay the ELG Rule's compliance deadlines while the Rule itself is reconsidered.

As a result of this action by the EPA Administrator requiring the reconsideration of the ELG Rule, PSNH is providing formal notification to EPA, as we discussed on April 18th, that it will delay the implementation of the work described in its February 17th filing until such time as there is clarity in the content and timing of a potentially very different, less onerous regulation. We believe that such a delay during this administrative stay is reasonable given these significant developments.

Please call me if you would like to discuss this further.

Very truly yours,

Handwritten signature of Linda T. Landis in black ink.

Linda T. Landis
Senior Counsel

cc: William H. Smagula, P.E., Vice President-Generation, Eversource Energy
Elizabeth H. Tillotson, Eversource Energy
Allan G. Palmer, Eversource Energy
Bradley Owens, Eversource Energy
Spencer M. Taylor, Esq., Balch & Bingham LLP
R. Bruce Barze, Jr., Esq., Balch & Bingham LLP
Thomas G. DeLawrence, Esq., Balch & Bingham LLP