

4/12/18 Call w/ Z Fabish of S. Club

- He thanked me re us issuing the Schiller Station permit; without commenting on the substance of it, he said SC was pleased it had been issued and the size of the package showed we'd done a lot of work on it

- I said we were pleased to have issued it as well, and that it was a lot of work to grapple with the many comments we'd received on both sides of the issues.

- He asked if I could provide an estimate of the schedule for the Merrimack permit

- I said that I honestly could not at this time:

- I explained that we had turned to the Merrimack permit and had had internal team meetings to begin our concerted effort on it, but the recent comment period closed in December 2017 and we got lots and lots of comments, including a variety of technical/scientific reports, and some of our team had been focusing on Schiller (and other things) between December 2017 and April 2018; so we were digging in, but I could not put a date on it.

- I suggested to him that he could write to David Webster to ask the question – i.e., when will the Merrimack permit come out – and the Agency can then figure out how to respond appropriately to that question

- I noted that appeals of Schiller could affect schedule for Merrimack

- He asked if we'd had any indication from GSP as to whether it will appeal the permit and I said they had not said that they would not, and their comments suggested some disagreement with certain aspects of the permit, but that my instinct was that they would not appeal. I would not be surprised if they did, but I did not think they would. Alternatively, if S Club appealed, I expected that GSP would enter the case.

- He asked if we had spoken with GSP and I said we had. That we had to work with them on permit transfers and had additional talks. I noted we had asked if they had any closure plans – because we were working on the permit, after all – and they indicated no current closure plans, while recognizing that they were operating as peaking units primarily in recent years.