



**Public Service
of New Hampshire**

→ Dave Webster
#271

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SSP

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The Northeast Utilities System

William H. Smagula, P.E.
Director - Generation

January 29, 2010

Stephen S. Perkins, Director
Office of Ecosystem Protection
United States Environmental Protection Agency
5 Post Office Square – Suite 100
Boston, Massachusetts 02109-3012

Dear Mr. Perkins:

On January 25, 2010, Public Service Company of New Hampshire (“PSNH”) received a supplemental Information Request pursuant to Section 308 of the Clean Water Act related to the draft NPDES Permit for Merrimack Station in Bow, New Hampshire.

PSNH intends to cooperate fully with the Environmental Protection Agency (“EPA”) in responding to this request for information. However, as a result of the extensive scope of the supplemental request (including not just elaboration of information already provided but new information as well) and PSNH staffing limitations, PSNH must engage and rely upon professional engineering consultants and biologists for assistance in developing and analyzing the requested information. As a result, immediately upon receipt of the EPA letter, we contacted both Enercon and Normandeau who provided support in the original effort and have agreed to work with us in preparing this response.

This joint effort by PSNH and consultants, however, will take time, particularly in view of the level of detail and extensive additional information sought. After reviewing the Information Request, Enercon estimates that the series of questions requiring the creation of new attachments detailing the empirical equations and methodology relied upon could require up to four months to complete. In addition, and of particular concern, additional analysis appears to be required by Request #15 for which Enercon has recommended an expansion of the data base to include the last four to five years in order to bolster accuracy. Enercon estimates an accurate and complete response to this supplemental Request for Information will require approximately 150 days. In brief, the supplemental Information Request will require a significant amount of effort from both our already fully engaged PSNH staff and our consultants.

As a result, in order to fully and accurately comply with this Information Request, we request an extension of one hundred and fifty days from the date we received the letter or June 24, 2010. We believe this extension will enable us to provide the new information requested as well as the greater detail EPA has requested.

We appreciate EPA's consideration of this request for an extension. It would be helpful for planning purposes if EPA could notify us of its decision as soon as possible. Please call me (603-634-2851) or Allan Palmer (603-634-2439) if you would like to discuss further.

Yours truly,



William H. Smagula, P. E.
Director – PSNH Generation

cc: John P. King, USEPA
Elise N. Zoli, Esq., Goodwin/Procter
Linda T. Landis, Senior Counsel – PSNH
Allan Palmer, PSNH