

From: [Stein, Mark](#)
To: [Ricci, Donna](#)
Subject: FW: CBI Question Related to the Schiller Station Permit
Date: Tuesday, January 09, 2018 9:35:12 AM

Donna - Please include this in the Admin record for Schiller. Thanks

From: Stein, Mark
Sent: Tuesday, January 09, 2018 9:34 AM
To: Linda T. Landis (linda.landis@eversource.com) <linda.landis@eversource.com>
Cc: Danielle Gaito <Gaito.Danielle@epa.gov>; Webster, David <Webster.David@epa.gov>
Subject: CBI Question Related to the Schiller Station Permit

Hi Linda –

I have a CBI-related question for you with respect to the Schiller NPDES permit.

As I understand it, PSNH submitted materials to Region 1 in 2008 and 2014 which presented various cooling water intake system-related costs (e.g., costs for closed-cycle cooling systems and costs for wedgewire screen systems) and claimed all of this information as CBI. PSNH later submitted the closed-cycle cooling information to the NH PUC and made this information public. Region 1 subsequently confirmed with you your intent that this closed-cycle cooling information no longer needed to be treated as CBI.

Turning now to wedgewire screen cost information, Region 1 has noted that in PSNH's 2016 comments on the Draft Permit for Schiller – specifically, in Enercon's report that is attached as Exhibit 1 to PSNH's comments – wedgewire screen information previously claimed as CBI is again presented but is no longer is claimed as CBI. Specifically, wedgewire screen cost information is presented in Section 5.1 (Wedgewire Installation Cost) on pages 30-31, and in Appendix 4, but this information is not claimed as CBI. Thus, it appears to Region 1 that PSNH does not intend this information to be treated as CBI. If it is not CBI, then Region 1 can include the Enercon document (unredacted) in our Administrative Record for the permit and the Region can reference the information, as necessary, in our written analysis supporting the permit. Unless we hear otherwise from you, we expect to treat this information as not having an associated claim of CBI.

Similarly, Appendix 4 to the Enercon report submitted with PSNH's 2016 comments includes wedgewire screen conceptual drawings from the 2008 and 2014 reports. While these drawings were previously claimed as CBI, they were not so claimed in the more recent report. Again, this appears to have been intentional, and Region 1 expects to treat this information as if it is not subject to a claim of CBI unless we hear otherwise from you.

At your earliest convenience, please let us know one way or the other.

Thanks very much.

- Mark

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