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October 20, 2015

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Re: Draft Permit Public Notice
NPDES No. NH0001473
PSNH Schiller Station

Dear Attorney Stein:

On September 30, 2015, the United States Environmental Protection Agency ("EPA") placed on public notice a Draft National Pollutant Discharge Elimination System ("NPDES") Permit for Public Service Company of New Hampshire's (d/b/a/ Eversource Energy) ("PSNH"), Schiller Station in Portsmouth, New Hampshire (the "Draft Permit"). EPA set the public notice period for 60 days, which expires on November 28, 2015. PSNH respectfully requests a 60-day extension of the public notice period to allow PSNH, its consultants, and other interested parties the opportunity to submit meaningful comments that will provide EPA critical information it needs before issuing a final NPDES permit. The initial 60-day period is not sufficient to adequately address the various technical, environmental, and financial issues in the Draft Permit that need to be addressed through the public comment period. Thus, PSNH respectfully requests that EPA extend the public notice period by 60 days, until **January 27, 2016**, in order to provide PSNH and the public a reasonable period of time to study and address all of the issues presented.

As you are aware, PSNH is at this time preparing for the divestiture of its generating assets, including Schiller Station, and has an extremely tight schedule to meet as part of this process. There are seventeen facilities that will potentially be offered at auction (which will be overseen by the New Hampshire Public Utilities Commission)("NH PUC"), and each of the properties must be described and evaluated in a Phase 1 Site Assessment done in

accordance with ASTM standards for potential bidders. That portfolio of work is due at the NH PUC by November 30, and prior to that due date, the work must be submitted to the New Hampshire Department of Environmental Services. In brief, our already limited employee resources are at this time dealing with this immense task and are unable to focus on the Schiller Draft Permit until near completion of the portfolio of site assessments.

In addition, our two primary consultants, Richard Clubb of Enercon Services, Inc. and Mark Mattson of Normandeau Associates, Inc., have been tied up in ongoing litigation in New York until just recently and are only now able to begin their review of the Draft Permit and extensive Fact Sheet.

Finally, allowing PSNH and the public an additional 60 days to review and analyze the Draft Permit—and EPA's 212-page technical Fact Sheet—and prepare meaningful and useful comments would be wholly reasonable under the circumstances. EPA last issued Schiller Station's NPDES permit over 25 years ago, during which time numerous regulatory, technical, and operational changes have transpired that bear on the limitations, conditions, and other requirements EPA proposes in the Draft Permit. Given the time with which EPA has had to work in developing the Draft Permit, PSNH and other stakeholders should be afforded a reasonable extension of 60 additional days to provide their own input to EPA. Moreover, a mere 60 additional days for public comment would not cause any appreciable harm to EPA's administrative process given the fact that Schiller Station's permit has already been administratively extended for two decades.

For all of the foregoing reasons, PSNH respectfully urges EPA to grant the requested public notice extension to give PSNH and the public a reasonable opportunity to provide the critical input that EPA has requested and should review prior to issuing a final permit.

Please feel free to contact me with any questions.

Yours truly,



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