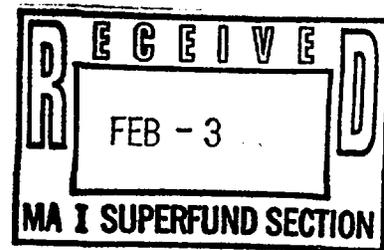


COM/Electric

60281
Commonwealth Electric Company
2421 Cranberry Highway
Wareham, Massachusetts 02571
Telephone (508) 291-0950

January 30, 1997

Mr. David Dickerson
Remedial Project Manager
United States Environmental Protection Agency
Region 1
John F. Kennedy Federal Building
Boston, MA 02203-0001



Re: Comments on EPA's Proposed Cleanup Plan for New Bedford Harbor

Dear Mr. Dickerson:

Thank you for your letter dated December 31, 1996 which provided an update to Commonwealth Electric Company ("COM/Electric") on the status of the Environmental Protection Agency's ("EPA") Proposed Cleanup Plan for New Bedford Harbor. You indicated in your letter that the EPA is accepting comments on the Proposed Cleanup Plan through January 23, 1997. I now understand that the EPA has extended the time for submitting formal, written comments until February 3, 1997 and, as such, COM/Electric submits its comments to the EPA in this letter to you.

As we have discussed in our prior conversations and as is laid out in the Proposed Cleanup Plan, the EPA is considering four alternative methods of dealing with COM/Electric's submerged power cables currently located in contaminated sediments in the Acushnet River. The first alternative involves reducing the overall width of the cable corridor by relocating COM/Electric's ten 13.8 kV cables closer to the two existing 115 kV cables. In addition, COM/Electric's planned 115 kV cable would be placed in this same corridor. By reducing the overall cable corridor, more remedial dredging could be accomplished than if the cables were to remain in their current location. The second alternative involves placing a geotextile material over the entire existing cable corridor, with no relocation of the existing cables. The third alternative involves the installation of a new system of cables and appurtenances which could be incorporated into the confined sediment disposal facilities ("CDF") on the New Bedford side of the river. The fourth alternative remedy mentioned in the Proposed Cleanup Plan is bioremediation.

After much consideration, COM/Electric has determined that it would prefer the third alternative of installing a new cable system. Such an approach would have the significant benefit of allowing for complete dredging of the contaminated area, as opposed to the first alternative which would leave a corridor that would still be contaminated. This could be accomplished by dredging a new cable corridor, installing new cables, removing the old cables from their existing location, and then completing the dredging of the

Mr. David Dickerson
January 30, 1997
Page 2

remainder of the affected area. COM/Electric would strongly encourage that this remedy allow for complete access to the new cables and appurtenances, and have the new cables and appurtenances located outside the CDFs. COM/Electric would work in full cooperation with the EPA in determining the best way to accomplish this effort. It is COM/Electric's understanding that the EPA's budget for the cleanup of New Bedford Harbor would accommodate this alternative. We expect that this remedy would include proper disposal of the existing cables, also.

COM/Electric would be extremely concerned should the EPA choose either the first or second alternative as the remedy of the contamination problem. Although decreasing the size of the contaminated area by reducing the width of the cable corridor would be better than leaving the existing cable corridor, there would still exist the potential disturbance of contaminated sediments should any maintenance or repair of the cables be required in the future. This result would not be acceptable to the EPA, COM/Electric, or the New Bedford and Acushnet communities. In addition, placing a geotextile material over the existing cable corridor would prevent COM/Electric from obtaining access to its cables, and, thus, could result in a prolonged electrical outage if there is a problem with one of the cables and immense expense to the Company and its customers if replacement cables would be necessary at some point in the future. With regard to the fourth alternative, while COM/Electric does not have any clear opposition to the concept of bioremediation other than the immense amount of time involved in producing successful results with such a remedy, we would be interested in learning more of the details involving this alternative.

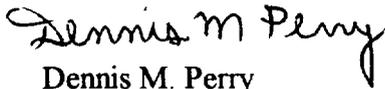
In conclusion, COM/Electric believes that total dredging of the contaminated area and the installation of a new cable system in the cleaned dredged out area outside the CDFs benefits COM/Electric and its customers in terms of reliability and would result in a remedy that provides for the most comprehensive cleanup possible. COM/Electric's ability to continue to provide reliable electric service to its customers in an environmentally sound manner is of utmost importance to the Company. Therefore, COM/Electric supports a remedy that allows us to retain access to the Company's cables in a relatively safe and clean environment. COM/Electric believes that whatever remedy is ultimately chosen with regard to our power cables, it should be performed at the expense of the EPA, as opposed to COM/Electric's customers, and should comply with the Company's standards and specifications.

Your letter also requested that COM/Electric indicate the locations and types of all of our existing and planned submerged power cables on the overhead illustration you provided. We are currently in the process of developing this information and will forward it to you upon its completion.

Mr. David Dickerson
January 30, 1997
Page 3

COM/Electric appreciates the opportunity by the EPA to be involved in developing a cleanup plan for this area and looks forward to continuing our discussions in this regard. We remain committed to working with the EPA in developing a remedy that meets our mutual objectives. Please feel free to contact me at (508) 291-0950, extension 3964, if you should have any questions concerning these comments. In addition, should any official service list be established for matter, please include the undersigned.

Very truly yours,



Dennis M. Perry
Project Manager

D:\NBSupply\NBCables.epa.wpd