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December 15, 2017

Mr. Mark A. Stein, Esq.
Senior Assistant Regional Counsel
U.S. EPA - Region 1
Office of Regional Counsel, Region 1
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Boston, MA 02109-3912

Ms. Sharon DeMeo
U.S. EPA - Region 1
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RE: Merrimack Station NPDES Permit – NH0001465

Dear Attorney Stein and Ms. DeMeo:

On behalf of the men and women of Public Service Company of New Hampshire's Generation ("PSNH"), who ensure that Merrimack Station's operations are in full compliance with all local, state, and federal laws every day while providing safe and reliable electric power to folks in the State of New Hampshire, we take great pride in submitting these comments in response to the Environmental Protection Agency's Statement of Substantial New Questions ("EPA") ("Statement"). EPA issued the Statement on August 4, 2017, requesting input on significant issues related to the renewal of the National Pollutant Discharge Elimination System ("NPDES") permit for Merrimack Station.

PSNH's comments, which respond to every issue raised by EPA, are based on the foundational work of knowledgeable engineers, scientists, and economists, expanding and updating information previously submitted as well as providing new, substantive information where appropriate. The reports of these experts are provided as attachments to our comments. PSNH's comments are based on the work of these outstanding individuals as well as the regulatory context that has changed so extensively since the original draft permit was issued in 2011.

We urge EPA to review these comments thoughtfully in drafting a final permit for Merrimack Station.

Sincerely,

Linda T. Landis

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