



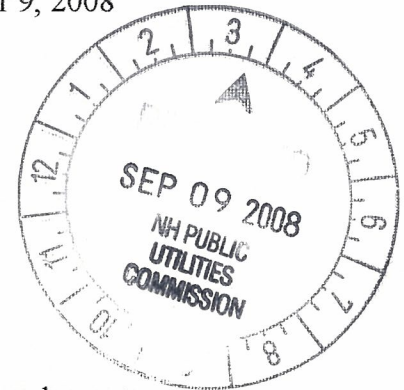
NEW HAMPSHIRE STATE BUILDING AND CONSTRUCTION TRADES COUNCIL

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September 9, 2008

Debra A. Howland
Executive Director and Secretary
NH Public Utilities Commission
21 South Fruit Street
Concord, NH 03301-2429



RE: Docket # 08-103: Investigation of PSNH Installation of Scrubber Technology at Merrimack Station

Dear Director Howland and Commissioners:

On behalf of the New Hampshire State Building and Construction Trades Council and the more than 5,000 workers and working families we represent – families who are also electric consumers in New Hampshire – I am writing to urge the Commission to quickly conclude its investigation of the installation of clean air “scrubber technology” at Merrimack Station so this important and environmentally-urgent project can move forward.

As you are well aware at this point, the New Hampshire Legislature several years ago passed legislation **requiring** Public Service Company of New Hampshire to invest in and install state of the art “scrubber technology” at its coal-powered Merrimack Station in Bow in order to reduce mercury and sulfur dioxide emissions at this facility by 85-90%. This legislation, which was supported by both industry and environmental interests, was promulgated and passed in order to achieve critical clean air objectives for our state. Nothing in the period between the passage of this legislation and the present has diminished the urgent need for the installation of this “scrubber” which PSNH is now poised to install at the Bow plant.

We are very cognizant of the fact that, due to rapidly escalating costs of metals and other required materials for this project as well as the cost of their transit, the estimated cost of this project has significantly increased. And, cost increases are a legitimate concern for any interested party, including PSNH. However, it would be unconscionable for the PUC to cause the delay of this project at this stage of the game (when contractors are poised to begin their work) and therefore cause not only a further delay in cleaning NH’s air but also causing further escalation of the project’s costs.

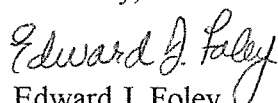
We ask you to keep in mind the following:

- This project has already been well vetted by 424 “consumer advocates” within the NH Legislature who recognized the compelling need to move forward with this urgent clean air project for NH.
- PUC-caused delay of this project will only cause further harm to consumers and rate-payers by increasing the cost of this project even more, not to mention the further harm it will cause to those who continue to breathe NH air.
- As concerned rate-payers ourselves, we are convinced by the available numbers that even at its increased cost, the scrubber project will not cause undue rate increases to individual consumers. The price is still manageable today, so why would the PUC want to make the price increases worse by causing further delay?
- It is inconceivable that the PUC, at this point, could even entertain the thought of directing the shut-down of the Bow facility because there is no other alternative source of reasonably-priced electrical generation capacity in NH at the present time to replace the energy generated at Merrimack Station.
- If the PUC wants to promote an alternative energy strategy, or greener technologies, for New Hampshire for the future, that is fine, and the workers we represent would like to be on the front lines of building such facilities. But that is the future, and the need for the Bow plant and the urgent need for cleaner air at Merrimack Station is NOW. How can the public interest possibly be served by thwarting or delaying a pro-environment project that has already been on the drawing board for several years?
- There are hundreds of highly skilled NH workers – our members – who are poised to begin work on this scrubber project in the near future. The good family-sustaining wages from these jobs will certainly enhance the NH communities in which our members live as well as the NH economy as a whole. To delay the start of these jobs is to do harm to the NH workers who are ready to begin work on the scrubber and whose family economic planning has been built around these anticipated jobs. These working families are NH consumers, too, and they are in triple jeopardy (environmentally, economically, and as ratepayers) by any further project delays.

While we can appreciate the concern that may have prompted the opening of this PUC docket, we urge the Commissioners to quickly look at the totality of the facts and the public good and to close this inquiry expeditiously to allow this project to go forward.

Thank you for your consideration of our concerns.

Sincerely,


Edward J. Foley
President
Cell: 603-717-2267

Enclosure: 7 Copies of this Letter

cc: Meredith A. Hatfield, Office of the Consumer Advocate