

LAW OFFICES  
**ARTHUR B. CUNNINGHAM**  
79 Checkerberry Lane, Hopkinton, NH 03229

July 25, 2011

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

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Re: Public Service Company of New Hampshire, Docket No.10-261

Dear Secretary Howland:

On behalf of the New Hampshire Sierra Club, please accept for filing an original and six copies of the Expert Report prepared by Dr. Ranajit Sahu.

Dr. Sahu was asked to provide expert testimony regarding the potential impacts that a prudent power plant operator must carefully analyze of new and upcoming pollution control regulations that will affect the operation of coal fired power plants such as MK1 and MK2 at Merrimack Station.

On May 25, 2011, the New Hampshire Sierra Club requested that the Public Utilities Commission ask the New Hampshire Department of Environmental Services, Air Resources Division, to submit written testimony regarding the programs addressed in the New Hampshire Sierra Club Data Requests.<sup>1</sup> The Commission has not responded to that request.

New Hampshire Sierra Club renews the request that the Commission invite the New Hampshire Department of Environmental Services to provide expert testimony on new and pending pollution control regulations, with special emphasis on state programs and their relationship to the federal programs. For example, the Environmental Protection Agency has just proposed Maximum Achievable Control Technology Standards [MACT] for hazardous air

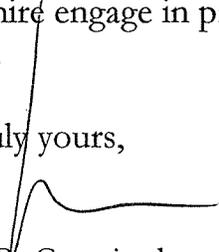
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<sup>1</sup> RSA 378:39 states: "...The Commission is encouraged to consult with appropriate state and federal agencies..." RSA 378:39 requires that the Commission consider "...potential environmental, economic and health related impacts of each proposed option..."

pollutants, including mercury; and, the New Hampshire Department of Environmental Services has just released the mercury baseline determination required by New Hampshire law.

The growing stringency and increasing costs of pollution control programs for old, coal fired power plants requires that Public Service Company of New Hampshire engage in prudent planning, conducted in an open, transparent manner.

Very truly yours,



Arthur B. Cunningham

cc: Service list; Thomas S. Burack, Commissioner, NHDES; Robert R. Scott, Director, Air Resources Division; Service List; Catherine M. Corkery, Chapter Director, New Hampshire Sierra Club