

# Concord Power and Steam



PO Box 2520, CONCORD, 03302-2520  
PH: 603-224-1461 F: 603-224-7816

June 1, 2011

Mr. Robert Scott  
NHDES  
Air Resources Division  
29 Hazen Drive  
PO Box 95  
Concord, NH 03302-0095

Reference: Temporary Permit No TP-0014, issued 02/27/2009  
Facility ID No 3301100017

Dear Mr. Scott,

In accordance with the rules contained in CHAPTER Env-A 600 STATEWIDE PERMIT SYSTEM and in particular Permit Reissuance Env-A 607.09 (b). Concord Power and Steam hereby requests an extension of its temporary permit in order to complete the construction and testing of it's facility.

We are specifically requesting the extension for the following causes that satisfy the required conditions as follows:

Env-A 607.09 Permit Re-issuance.

(a) The owner or operator may request a reissuance of a temporary permit for a period not to exceed one year, provided that at least one of the following is met:

(1) Actual construction has been completed by the expiration date, but any required compliance testing has not been completed;

**Not applicable**

(2) Actual construction has commenced by the expiration date, but it has not been completed;

**Equipment has been purchased and work has begun at the project site. The 18.5 MW turbine generator has been purchased, removed from its previous location and dismantled for inspection and renovation. \$577,786 has been spent on this piece of equipment.**

**The property was purchased for \$2,674,481 in 2007. Land clearing and grubbing was completed last fall. The entrance road construction began in December 2010, was closed down for the winter and will start again this spring. \$333,873 has been spent to date on actual work on the property on site preparation and road construction for the project.**

**An additional \$1,336,291 has been spent on engineering, architects and project development for a total expenditure to date of \$5,209,202.**

(3) Actual construction has not commenced, but the owner or operator provides a copy of at least one binding agreement or contractual obligation which cannot be canceled or modified without substantial loss to the owner or operator;

**Concord Power and Steam has purchased the property on which the plant is to be built. This property cannot be resold at the price that it was purchased for under today's market conditions. The loss on the property could result in substantial losses of over \$1,400,000. The property was purchased for \$2,650,000 in 2007. Over \$256,000 have been spent to date on site cleanup and demolition of existing structures. (Copy of purchase and sales agreement attached.)**

**Additionally CP&S has purchased a turbine generator set and entered in to a contract for the installation of said equipment which cannot be canceled and will experience substantial losses in excess of \$1,000,000. (Copy of sales and construction contract attached.)**

**A commitment to provide electricity to ISO-NE was made through the Forward Capacity Market process. If the project is delayed further, than the \$330,000 put up as a deposit is forfeit and the contract for sale of electrical capacity will be canceled.**

(4) The owner or operator is in the process of obtaining a permit or permits from another governmental entity; or

**CP&S is waiting on Unitil and ISO-NE to complete the electrical interconnect study that has been in process since early 2010. A final payment to ISO was made in September 2010 for engineering and technical studies to complete the process. Their guidelines call for this study to be complete within 90 days from payment.**

**An application is before the City of Concord city council to enter into a Payment in Lieu of Taxes (PILOT) agreement.**



**The State of NH has issued a Letter of Intent to purchase the remaining power output from the new plant. The final contract has been in negotiation since September of 2010 and is expected to be finalized and go before the Governor and Executive Council within 45 days. This agreement is required before financing can be finalized and the plant construction started.**

(5) The owner or operator is involved in litigation where a permit from another governmental entity has been issued and appealed.

**Not Applicable**

Your consideration of this matter is appreciated. If you have any questions or concerns please contact Mark Saltsman at (603)224-1461 ext. 121, email [mes@concordsteam.com](mailto:mes@concordsteam.com) or Peter Bloomfield at (603)224-1461 ext. 123, email [peter@concordsteam.com](mailto:peter@concordsteam.com) .

Sincerely,

A handwritten signature in black ink that reads "Peter Bloomfield". The signature is written in a cursive, flowing style.

Peter Bloomfield, Pres  
Concord Power and Steam  
PO Box 2520  
Concord, NH 03302

Attachments:

Certification of the Responsible Official (IAW Env-A. 605.04)  
287 S. Main St. Purchase and Sale agreement  
Energy Resources Group Turbine Sales agreement  
State of NH Letter of Intent

CC: AMERESCO –Peter Wallis

## **Certification of Responsible Official**

Permit No: **TP-0014**  
Date Issued: **February 27, 2009**

Facility:  
**Concord Power & Steam LLC**  
**291 South Main Street**  
**Concord, NH 03301**  
**Facility ID Number – 3301100017**

"I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

Signed:



Responsible Official:  
**Peter Bloomfield**  
**President**  
**(603) 224-1461 X123**

This certification is for the request for extension (permit reissue) letter dated **June 1 2011**. Submitted to the New Hampshire Department of Environmental Services, Air Resources Division