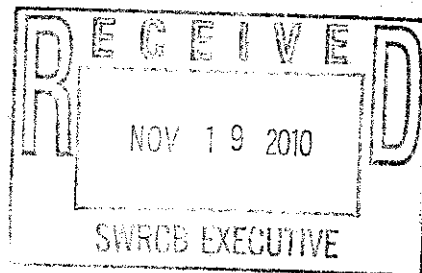




November 19, 2010

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Re: Comment Letter – OTC Policy Amendment

Dear Ms. Townsend,

Mirant Delta, LLC (Mirant), appreciates the opportunity to submit written comments on the State Water Resources Control Board's Proposed Amendment (Amendment) to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (OTC Policy). Mirant owns and operates two electric generation facilities that will be subject to the OTC Policy that became effective on October 1, 2010 and any subsequent amendments.

The Amendment's revisions to Sections 2.A(2)(d) and 2.C(3) of the OTC Policy provide additional compliance flexibility to the three existing combined-cycle generating facilities that utilize once-through cooling. Mirant fully supports the Amendment and believes that similar compliance flexibility should be provided to all of the facilities subject to the OTC Policy. Accordingly, Mirant supports the language additions proposed by RRI Energy in its comment letter.

Sincerely,

Peter Landreth  
Director, California Environmental Policy