

Nixon, Elizabeth

From: richard.labrecque@nu.com
Sent: Friday, January 11, 2013 4:02 PM
To: Nixon, Elizabeth
Subject: Re: Preliminary Draft of Puc 2500-Electric Renewable Portfolio Standard

Elizabeth - here are some preliminary comments from PSNH.

2502.03 (c) - the wording is ambiguous (to me). Is it the date the unit began delivering useful thermal energy - or the date the meter was installed?

2502.05 - "Class I source" - I believe the draft language misinterprets the intent of the statute. Geothermal systems that generate electricity are still eligible for Class I REC as before. However, Geothermal systems seeking to earn Class I Thermal RECs must have began operation after Jan 1, 2013. Same for Solar Thermal systems. The draft language would disqualify electrical production from these 2 types of resources.

2502.10 (a) and (b) - I believe you need to change "The quantity of reductions shall..." to "The quantity of reductions required shall...".

2502.35 (d) - the reference to 0.075 Mmbtu/hr is identical to the statute - but the statute is incorrect. Should be lbs / Mmbtu.

2502.36 - reference to RSA 362-F:2, X-a should be 362-F:2, XV-a

2503.01 (d) and (f) - the statute says "the commission may..." not "the commission shall".

2503.04 (a) and (e) - should be for all "providers of electricity" - not just "electric distribution utility"

2503.04 (b)(2) and (b)(3) - kWh should be kW

2504.03 - why has this section been revised to only address fractional certificates?

2505.02 (b)(12) and (b)(13) - sentence seems to be missing a few words

2506.02 (f) - how can the owner make this certification? should be the independent monitor.

2506.04 (r) - two problems. 1) the owner will not be able to communicate with the GIS administrator. It would need to be a certified monitor. 2) the GIS may never be configured to accept thermal energy certificates, even if they are expressed as MWH equivalents.

2506.05 (a) - Puc 900 does not address CHP REC meters. It only discusses utility meter as per "normal practices".

2505.08 and 2505.09 on Page 28 are duplicates of 2505.15(a) and 2505.16 on Page 22.

2506 (Page 29) and forward are misnumbered.

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Date: 12/21/2012 09:52 AM
Subject: Preliminary Draft of Puc 2500-Electric Renewable Portfolio Standard

Please find attached a preliminary draft revision of Puc 2500, Electric Renewable Portfolio Standard with the proposed language to incorporate Senate Bill 218. Please provide us with any comments by January 25, 2013. You will also have another opportunity to comment during the formal rulemaking process.

We are particularly interested in your comments related to the following:

1. Monitoring/metering requirements for useful thermal sources, especially specific standards that the meters need to meet;
2. Application requirements for useful thermal sources;
3. Application requirements for co-fired facilities;
4. Methodology for co-fired facilities to calculate renewable energy certificates; and
5. Qualifications for independent monitors.

We also have established a website related to this rulemaking:
<http://www.puc.nh.gov/Sustainable%20Energy/Class%20I%20Thermal%20Renewable%20Energy.html>

We will hold a stakeholder meeting on January 25, 2013 at 9:30 am in Getz Hearing Room 103 at the Public Utilities Commission at 21 S. Fruit Street, Concord, NH.

If you have any questions, please let us know. We look forward to receiving your comments.

Happy Holidays!

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