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THE STATE OF NEW HAMPSHIRE



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WHPUC 17DEC'13PH12:02

December 17, 2013

Marcia R. Fischer Green Mountain Power 163 Acorn Lane Colchester, VT 05446-6611

Re: DE 13-316, Green Mountain Power Application for Certification as a REC Eligible Facility - Chaput Family Farms

Dear Ms. Fischer;

On November 4, 2013, the Commission received an application from Green Mountain Power on behalf of Chaput Family Farms, North Troy, Vermont, requesting Class I renewable energy certificate (REC) eligibility for the Chaput Family Farms' 300 kilowatt (kW) farm-methane fueled generating station pursuant to Puc 2505. Staff has reviewed the application and has corresponded via email with Ebenezer Punderson, Esquire, Deppman & Foley, P.C., and David J. Dunn, Green Mountain Power, as representatives of the applicant.

Staff requests that the following additional information be submitted in order to complete the application for review and determination of eligibility:

- 1. Please confirm that the Chaput Family Farms generation facility is not a "customer-sited source", defined in RSA 362-F:2,V as "a source that is interconnected on the end-use customer's side of the retail electricity meter in such a manner that it displaces all or part of the metered consumption of the end-use customer." Pursuant to Puc 2505.01(f), customer-sited sources located outside of New Hampshire are not eligible for New Hampshire RECs.
- 2. Please describe how the electric energy output of the Chaput Family Farms generation facility reported to the NEPOOL-GIS administrator will exclude "station service" or "parasitic load", meaning the portion of electric production used in the generation of power at the facility, and describe the metering configuration,

monitoring procedures and any calculations that will be used to determine the net amount of output to be reported.¹

The Commission seeks to clarify these issues to ensure that the record supports a determination regarding Chaput Family Farms' eligibility as a Class I source of RECs.

Please refer to docket number **DE 13-316** in your correspondence with the Commission. Your response should include an original and two copies sent to the attention of the Commission's Executive Director:

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429
executive.director@puc.nh.gov

Please also send an electronic copy via email to executive.director@puc.nh.gov, and copy me at barbara.bernstein@puc.nh.gov. Should you have any questions, please do not hesitate to contact me. My direct line is 603-271-6011. I look forward to working with you.

Sincerely,

Barbara Bernstein

Sustainable Energy Analyst

cc: David K. Wiesner, NHPUC Staff Attorney
Jack Ruderman, Director, Sustainable Energy Division

¹ New Hampshire has disqualified station service from REC eligibility and requires that station service be accounted for and subtracted from the reported electrical generation output of a renewable energy source. See DE 09-212, Indeck Alexandria, http://www.puc.nh.gov/Regulatory/Docketbk/2009/09-212.html. For an example of an approved methodology developed to subtract station service from generation output, see DE 12-210, Spaulding Hydro, http://www.puc.nh.gov/Regulatory/Docketbk/2012/12-210.html.