DE 13-318

TDD Access: Relay NH 1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website: www.puc.nh.gov

MIPUC 2MAP14em10:15

May 2, 2014

Stephen J. Hickey Hydro Management Group, LLC 55 Union Street, 4th Floor Boston, MA 02108

Re: DE 13-318, Monadnock Paper Mills Application for Certification of the Monadnock Dam Power Station as a Class I REC Eligible Facility

Dear Mr. Hickey:

On March 19, 2014, the Commission received supplemental information from Hydro Management Group, as authorized agent for Monadnock Paper Mills, Inc. (MPM). This information was intended to supplement MPM's request for Class I renewable energy certificate (REC) eligibility for the increased incremental output generated by the Monadnock Dam Power Station (Monadnock Station) over its historical generation baseline, pursuant to Puc 2505.05. Staff has reviewed the application and the supplemental information submitted, and has found that the following additional information is required to complete the review for eligibility:

1. Pursuant to RSA 362-F:2 X (b), information regarding the historical generation baseline for the Monadnock Station must be provided. The statute defines "historical generation baseline" as follows:

The average annual production of a hydroelectric facility from the later of January 1, 1986 or the date of first commercial operation through December 31, 2005. If the hydroelectric facility experienced an upgrade or expansion during the historical generation baseline period, actual generation for that entire period shall be adjusted to estimate the average annual production that would have occurred had the upgrade or expansion been in effect during the entire historical generation baseline period.

MPM is required to provide the average annual production for the facility from 1986 through 2005, in accordance with this statutory requirement.

2. Please describe how the independent monitor, William P. Short, III, would report the facility's incremental output to the NEPOOL-GIS system. Would Mr. Short



PUBLIC UTILITIES COMMISSION 21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429

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report to GIS both the behind-the-meter production and the excess power output delivered into the PSNH distribution system?

- 3. Is there anyone on the site other than an employee of MPM who manages and/or operates Monadnock Station? If so, please identify the manager(s) and/or operator(s) and provide contact information for them.
- 4. It is imperative that MPM provide the Commission with an affidavit of an authorized MPM representative that covers all factual information included in the original application as well as all supplemental information provided, including the response to this letter.

The Commission seeks to clarify these issues to ensure that the record supports a determination regarding the Monadnock Station's eligibility as a Class I source of RECs based on its increased incremental electricity output over its historical generation baseline, resulting from capital investments made after January 1, 2006 with the successful purpose of improving the efficiency or increasing the output of renewable energy from the facility.

Please contact me if you seek any additional guidance regarding these requests. Please refer to docket number **DE 13-318** 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 <u>executive.director@puc.nh.gov</u>

Please also send an electronic copy via e-mail to <u>executive.director@puc.nh.gov</u>, and copy me at <u>barbara.bernstein@puc.nh.gov</u>. Should you have any questions, please do not hesitate to contact me. My direct line is 603-271-6011. I look forward to continuing to work with you to resolve this matter.

Sincerely,

BerbaugBerstein

Barbara Bernstein Sustainable Energy Analyst

cc: Michelle Hamm, Manager- Environmental Services, Monadnock Paper Mills, Inc. David K. Wiesner, NHPUC Staff Attorney Jack Ruderman, Director, Sustainable Energy Division

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

Executive.Director@puc.nh.gov amanda.noonan@puc.nh.gov barbara.bernstein@puc.nh.gov Christina.Martin@oca.nh.gov david.wiesner@puc.nh.gov Jack.ruderman@puc.nh.gov mhamm@mpm.com steve.mullen@puc.nh.gov susan.chamberlin@oca.nh.gov tom.frantz@puc.nh.gov

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FILING INSTRUCTIONS:

a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with: DEBRA A HOWLAND

EXECUTIVE DIRECTOR NHPUC 21 S. FRUIT ST, SUITE 10 CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.