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STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION

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July 26, 2016

Richard Silkman
Chief Executive Officer
Competitive Energy Services, LLC
148 Middle Street, Suite 500
Portland, ME 04101

Re: REC 16-464, Abenaki Hydroelectric Station Application for Certification as a REC
Eligible Facility – 2nd Request for Further Information to Support Class I Eligibility
Determination

Dear Mr. Silkman:

Commission Staff have reviewed the supplemental letter received on June 16, 2016, in response to our request for further information regarding the application filed on April 16, 2016 for Abenaki Hydroelectric Station Unit #6 to be qualified for Class I renewable energy certificate (REC) eligibility based on its incremental generation output. Based on this review, we have identified the following matters which require further clarification:

1. Please confirm whether or not both of the Madison Paper Industries mills (i.e., the so-called Groundwood Mill and Paper Mill) have now been shut down and therefore there is little or no load behind the meter and all of the electrical output of the Abenaki and Anson hydroelectric stations will be delivered into the grid.
2. Please confirm whether or not the annual generation output information provided by the applicant includes both the power consumed by the two paper mills behind-the-meter and the net power output exported into the grid.
3. Attachment 4 in the application states that the PPA with CMP included interconnection provisions, but when that PPA expired "the facilities never entered into a new replacement Interconnection Agreement." This statement that no interconnection agreement is in effect does not satisfy the requirement under Puc 2505.02(c)(8) that the REC applicant submit proof that it "either has an approved interconnection study on file with the commission, is a party to a currently effective interconnection agreement, or is otherwise not required to undertake an interconnection study." Please either file a new interconnection agreement with the appropriate party (i.e., Madison Electric Works and/or CMP) or explain why no

interconnection agreement or study is required, preferably with back-up clarification and confirmation from the appropriate utility, whether MEW and/or CMP.

Staff also recommends that an amended Class I REC certification application be submitted, because the application as filed is incorrect in two significant respects:

- (i) Certification is sought only for Unit #6, but the Commission's precedent in the [PSNH](#) and [Holyoke](#) decisions supports the view that it is an entire hydroelectric project, and not just any specific unit therein, that is to be certified as REC-eligible; and
- (ii) Unit #6 is described as a customer-sited source with an independent monitor and a "NON" number in the NEPOOL-GIS system, but out-of-state customer-sited sources cannot be REC-eligible under RSA 362-F:6, II.

The REC certification request may be most appropriate if it references both the Abenaki and Anson power plants, the net output of which is reported together to ISO-NE and GIS under the number MSS 1114, and seeks New Hampshire Class I REC eligibility for the annual incremental generation output reported under MSS 1114 that exceeds the 20-year historical generation baseline for the two plants as a result of the addition of Unit #6.

Staff will resume review of the application once all of the necessary supporting information has been received. Please refer to docket number [REC 16-464](#) 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.

Sincerely,



Barbara Bernstein
Sustainable Energy Division

cc: David Shulock, NHPUC Staff Attorney

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.

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Docket #: 16-464-1 Printed: July 26, 2016

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.**