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Debra A. Howland
Executive Director & Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
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October 1, 2010

Re: DE 10-087, Ampersand Gilman Hydro LP, FERC Project No. 2392-024
Certification application for Class I eligibility pursuant to RSA 362-F
Request for additional information

Dear Ms. Howland:

In response to Maureen Reno's email to me on September 21, 2010, I am hereby submitting on behalf of Ampersand Gilman Hydro, LP (AGH) a formal request to waive Puc 2502.20 (a), pursuant to Puc 202.01 (d).

Puc 2502.20 (a) states that, for purposes of qualifying renewable power generation from hydroelectric resources, the historical generation baseline must be calculated based on "the average annual production, in megawatt-hours, from the later of January 1, 1986 or the date of first commercial operation through December 31, 2005, adjusted as if any upgrade or expansion completed during the period had been in place over the entire period".

The New Hampshire Public Utilities Commission (NH PUC), represented in this case by Maureen Reno, and AGH have been working together to gather the required data in order to complete AGH's certification application for Class I eligibility pursuant to RSA 362-F. AGH is able to provide monthly historical generation data dating back to January 1, 1987 through December 31, 2005, with the exception of the year 1998 in which actual generation for the months of January through May are unavailable.

AGH has made every possible effort to obtain generation data for the year of 1986 and the above mentioned months in 1998. AGH, with the support of the NH PUC, has contacted previous owners of the project, the interconnecting distribution

and transmission companies, and the ISO-NE. Unfortunately, all contacted sources were unable to provide the missing data. Monthly generation for the months of January through May of 1998 has been estimated by using the monthly average for the preceding 11 years.

AGH submitted the initial application to the NH PUC on March 29, 2010. Since then, AGH has made every effort to comply with the requests made by the NH PUC and responded to all questions promptly. AGH has provided all other information required pursuant to Puc 2500 in connection with its request. We understand that the NH PUC is generally acknowledging that efficiency improvements and associated capital investments made at the Gilman hydro project resulted in increased renewable energy output and improvements in the efficiency of electricity generation, as per Puc 2502.07 (d).

We believe that the NH PUC is acting in accordance with Puc 201.05 (a) and (b) by granting this waiver as additional renewable power generation certified in New Hampshire is in the interest of the public, helping New Hampshire load serving entities to comply with the State's renewable energy targets. We also believe that all other requirements of Puc 201.05 (a) and (b) are satisfied, in particular with regards to the alternative method proposed. The estimates provided for the months in which actual generation is missing reflects a conservative approximation, considering the low average monthly and generation in years preceding 1998, in comparison to the years following 1998.

Therefore, AGH is requesting to waive Puc 2502.20 (a), pursuant to Puc 202.01 (d) in order to enable AGH's hydroelectric facility to generate New Hampshire Class I Renewable Energy Certificates (RECs) for output exceeding the historical baseline provided to you in previous correspondence (20,261 MWh).

We are looking forward to hearing from you soon.

Sincerely,



Lutz Loegers
VP Operations
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