

# KEI (Maine) POWER MANAGEMENT (II) LLC

Thursday, March 9, 2012

Ms. Debra A. Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 South Fruit St., Suite 10  
Concord, NH 03301-2429



**RE: DE 12-042, KEI (USA) Power Management Inc.'s (KEI) Application for Burnham Hydroelectric Project's Certification for Class IV New Hampshire Renewable Energy Certificates Pursuant to RSA 362-F Request for Additional Information**

Dear Ms. Howland:

On March 5, 2012, the New Hampshire Public Utilities Commission (Commission) submitted a request for additional information for our Burnham Hydroelectric Project's (the Project) New Hampshire Class IV Certification for Renewable Energy Certificates Pursuant to RSA 362-F.

Please see KEI's answers in bold to each question listed below in italic.

1.) *The name and location of the facility. The location of every applicant facility is verified using Google Earth. The address provided was not close to the facility and the longitude and latitude was not as accurate as most of the descriptions that are provided. Please verify this information.*

**The address submitted was taken from our tax account information. The longitude and latitude coordinates submitted lead directly to the Project's powerhouse situated in the city of Burnham using Google Maps. The dam itself is situated approximately 500 feet upstream of the powerhouse.**

2.) *A description of the facility, including fuel type, gross nameplate generation capacity, the initial commercial operation date and the date it began operation if different. Review of the application has not yielded identification of the nameplate capacity. This is critical information as we cannot provide certification without verification of what the facility will produce.*

**A confidential copy of the Interconnection Agreement is attached. The information requested appears in Schedule A.**

3.) *Proof that the applicant 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 provide the NH PUC with the Interconnection agreement. This will provide the verification needed to determine the generation of electricity from the Bumham Project. The application submitted states that the interconnection agreement is confidential. Please see Puc 100-200 Final Proposal Fixed Text Non Expiring 1-11-12 (pages 3 & 4) at <http://www.puc.nh.gov/Regulatory/Proposed%20Rules/Puc%20100-200%20Final%20Proposal%20Fixed%20Text%20Non%20Expiring%201-11-12.pdf> for*

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*information on how to prepare your confidential information for submittal. If you have any questions on preparing this information, please don't hesitate to call me at 603-271-6011.*

**A confidential copy of the Interconnection Agreement is attached.**

*4.) A description of how the generation facility is connected to the distribution utility. This description is typically confidential for a facility the size of the Burnham Project and is often found in the interconnection agreement. It usually includes information about the substation and how the power flows to the grid. Please be assured that New Hampshire PUC uses this information for verification and any discussion of the electrical flow is kept very general.*

**As stated in Schedule A of the Interconnection Agreement, the facility is connected to the distribution utility in the following manner: Electric power is delivered from the interconnection of the Project's 34 kV cable to Central Maine Power's (CMP) 34 kV distribution circuit tap 80701 located on CMP's Distribution Circuit Tap 807D1.**

*5.) A statement as to whether the facility has been certified under another non-federal jurisdiction's renewable portfolio standard and proof thereof Please provide verification of the Burnham Project's certification in both Connecticut and Maine.*

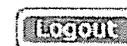
**The Project currently qualifies as a Class II renewable energy source in the state of Connecticut and as a Class II renewable energy source in the state of Maine. Please see attached GIS certificate information sheets stating our eligibility in both states.**

Thank you and please do not hesitate to contact me for more information.

Sincerely,



Stéphane Cohen  
KEI (USA) Power Management Inc.  
c/o Kruger Energy Inc.  
3285 chemin Bedford  
Montreal, Québec  
H3S 1G5  
E-mail: [stephane.cohen@kruger.com](mailto:stephane.cohen@kruger.com)  
Tel: 514-343-3100 ext. 2109



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### Certificate Information

Plant - Unit Name: **UNDER5MW - PITTSFIELD HYDRO**

Month and year of generation : **5/2011**

Certificate Serial Numbers: **[REDACTED]**

Total Certificates: **[REDACTED]**

### Part 1 - Fuel Sources

#### 100% - Hydroelectric/Hydropower

Short Description - **Hydroelectric/Hydropower**

Description - **Hydroelectric/Hydropower**

Fuel Type Attributes -

- **Hydro-small (30 MW or less) - Automatically qualifies as Connecticut CEO-eligible**
- **Hydro-daily cycle**
- **Hydro - run-of-the-river hydropower facility that has a nameplate generating capacity of not more than five megawatts, does not cause an appreciable change in the river flow, and began operation prior to July 1, 2003**

### Part 2 - Renewable Portfolio Standard ("RPS") Eligibility

#### Connecticut

Class I Renewable Energy Source: **No**

Class II Renewable Energy Source: **Yes**

State Certification Number: **CT00059-03**

Date of Eligibility: **01/2004**

Class III Portfolio Standard: **No**

Eligible under Clean Energy Options ("CEO"): **Yes**

R-O-R Hydro: Percentage Qualifying as Class I: **NA**

#### Massachusetts

RPS Class I Renewable Generation Unit: **No**

Solar Carve-Out Unit: **No**

Auction Solar Carve-Out Unit: **No**

RPS Class II Renewable Generation Unit: **No**

RPS Class II Waste Energy Generation Unit: **No**

APS Alternative Generation Unit: **No**

Generation level per year or Energy imported per year above which qualifies as RPS New Renewable Resource: **NA**

RPS Statement Of Qualification Number:

Eligible MA Renewable for NOx allowances claims from Public Benefit set-a-side: **No**

MA Renewable NOx State Certification Number:

#### Maine

Class I New Renewable Energy Resource Qualification: **No**

Class II Eligible Resource: **Yes**

Community Based Renewable Energy: **No**

Eligible for CO2 Netting: **No**

State Certification Number:

Date of Eligibility: **NA**

#### Rhode Island

New Renewable Energy Resource: **No**

State Certification Number:

Date of Eligibility: **NA**

Existing Renewable Energy Resource: **No**

State Certification Number:

Date of Eligibility: **NA**

#### **New Hampshire**

Class I Source: **No**

Average annual electric production (in MWh) from a facility other than hydroelectric from 2004 through 2006, or for the first 36 months after commercial operation if that date is after December 31, 2001: **NA**

Average annual production (in MWh) of a hydroelectric facility from the later of January 1, 1986 or the date of first commercial operation through December 31, 2005 (if such a facility was upgraded or expanded during this baseline period, actual generation should be adjusted to estimate the average annual production that would have occurred had the upgrade or expansion been in place for this entire period): **NA**

Class II Source: **No**

Class III Source: **No**

Class IV Source: **No**

State Certification Number:

Date of Eligibility: **NA**

#### **Part 3 - Emissions**

CEM Reporting: **No**

ORIS PL:

Emissions Unit ID(s):

Peer unit name and address (if not reporting actual generator emissions): **NA**

Normalized emission per MWh (pounds)

- Carbon dioxide: **0.00000**
- Carbon monoxide: **0.00000**
- Mercury: **0.00000**
- Nitrogen oxides: **0.00000**
- Particulate matter: **0.00000**
- Particulate Matter 10 Microns: **0.00000**
- Sulfur dioxides: **0.00000**
- Volatile organic compounds: **0.00000**

Emissions Free Energy Certificate: Yes

#### **Part 4 - Labor Characteristics**

Majority of employees operating at generation plant are employed under collective bargaining agreement: **No**  
If generating plant experienced a labor dispute in the most recent calendar year, replacement workers were used: **No**

#### **Part 5 - Vintage**

Vintage (month and year of commercial operation): **12/1984**

Repowering/derate date: **NA**

Refurbishment date: **NA** (Relevant to Maine RPS)

Date Operation Recommended after at Least Two Years of Not Operating: **NA** (Relevant to Maine RPS)

Date recognized by System Operators as capacity resource after not being recognized as a capacity resource for at least two years: **NA** (Relevant to Maine RPS)

Capacity addition/subtraction: **NA**

FERC hydroelectric license relicensing date: **NA**

#### **Part 6 - Asset identification**

Asset identification: **2290**

Asset owner: **NA**  
Status: **ACT**  
Capacity: **1.1**  
Ability to Cogenerate Electricity and Steam: **No**  
Steam was generated with Electricity for the Vintage : **No**

**Part 7 - Total MWh generated during the reporting period**

Total MWh generated: **[REDACTED]**

**Part 8 - Location of GIS Generator**

Location of generating unit: **New England (ISO New England Control Area)**  
State: **MAINE**

**Part 9 - Green-E Eligibility**

Green-E eligible: **No**  
Green-E fuel type: **Hydroelectric/Hydropower-Hydroelectric/Hydropower2-Less than 30MW**

**Part 10 - Third Party Reporting Entity**

Third Party Reporting Entity: **ISO-NE**

**Part 11 - Status under Regional Greenhouse Gas Initiative**

Generating Unit in Control Area that is subject to RGGI requirements ("RGGI-Affected"): **No**  
Generating Unit in Control Area that is not RGGI-Affected solely because it has a generating capacity under 25 MW: **No**  
Generating Unit in Control Area that is not RGGI-Affected because of its fuel source, regardless of its generating capacity: **Yes**  
Generating Unit not in Control Area: **No**

**Part 12 - Low Impact Hydro Institute Certification**

Low Impact Hydro Institute eligible: **0**