



Be Electronic Mail

February 21, 2013

Debra Howland
Executive Director
NH Public Utilities Commission
21 S. Fruit Street
Concord NH 03301

Re: Docket No. DE 13-021; Electric Renewable Portfolio Standards Adjustments to Class I and Class III Renewable Portfolio

Dear Ms Howland:

New England Wood Pellet respectfully submits these comments in response to the request for public input in the supplemental notice opening Docket No. DE 13-021, which request was stated verbally by Commissioners Harrington and Scott at the public input session on February 14, 2013.

In the Supplemental Notice issued by the Commission, the Commission asked for comments "as to whether it is reasonable to delay the implementation of the new useful thermal REC requirement for one year". It is our preference that the Commission not delay rulemaking for one year. We believe staff has had sufficient time to develop and advance a stakeholder's draft of the changes to Puc 2500 necessary to implement the provisions of Senate Bill 218 (2012 session).

However, we are familiar with the RSA 541-A process as well as review of rules by the Joint Legislative Committee on Administrative Rules. As we now find ourselves in February and no formal notice commencing rulemaking has been issued, we recognize it will be at least another 6-9 months to complete the rulemaking process under the most optimistic scenario, and that this complicates the obligation of the retail electric service providers to meet their 2013 REC purchase requirement in a timely and cost effective manner.

We ask that the commission attempt to hold to a December 31, 2013 target date to complete the rulemaking, including if possible complete review and ratification by JLCAR.

We further ask that the commission apportion the 2013 0.2% Class I thermal carve-out REC allocation to the 2014 and 2015 years, so that this allocation – prescribed in statute – and the incentive for renewable thermal development that it supports, is not lost as a result of the delay. Thus, the REC allocation would be reconfigured as follows:

	2013	2014	2015	2016
Current allocation of thermal carve-out (RSA 362-F:3)	0.2%	0.4%	0.6%	0.8%
Proposed with delay to 2014 and reapportionment of 2013 allocation to 2014 and 2015	0.0%	0.5% (+0.1%)	0.7% (+0.1%)	0.8%

This still allows for the orderly ramp-up for the thermal carve-out sub-class without placing undue administrative or cost burden on retail electric service providers.

Our company is eager and willing to work with PUC staff to address any technical issues related to rulemaking for the addition of thermal to the RPS. We hope that the staff will advise us on how we can be most helpful.

We thank the commission for consideration of our comments.

Sincerely,



Charles R. Niebling
General Manager