

In Re:

*DE 13-298 RENEWABLE ENERGY INCENTIVE PROGRAM FOR
C & I BULK FUEL-FED WOOD PELLET CENTRAL HEATING SYSTEMS*

*Public Comment Hearing
June 3, 2016*

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Public Comment Hearing - June 3, 2016
DE 13-298 RENEWABLE ENERGY INCENTIVE PROGRAM FOR C & I BULK FUEL-FED WOOD PELLET
CENTRAL HEATING SYSTEMS

1 STATE OF NEW HAMPSHIRE
2 PUBLIC UTILITIES COMMISSION
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5 June 3, 2016 - 2:13 P.M.
6 Concord, New Hampshire
7
8 RE: DE 13-298
9 RENEWABLE ENERGY INCENTIVE PROGRAM FOR
10 COMMERCIAL AND INDUSTRIAL BULK FUEL-FED
11 WOOD PELLET CENTRAL HEATING SYSTEMS
12 Public Comment Hearing
13
14 PRESENT: Chairman Martin P. Honigberg, Presiding
15 Commissioner Robert R. Scott
16 Commissioner Kathryn M. Bailey
17
18 Sandy Deno, Clerk
19
20 APPEARANCES:
21 Reptg. Commission Staff - Sustainable
22 Energy Division:
23 David K. Wiesner, Esq.
24 Barbara Bernstein
Karen Cramton
Tanya Wayland
COURT REPORTER: SUSAN J. ROBIDAS, N.H. LCR NO. 44

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1 PROCEEDINGS
2 CHAIRMAN HONIGBERG: Good afternoon,
3 everyone. Please be seated. We're here in
4 Docket DE 13-298, Renewable Energy Incentive
5 Program for Commercial and Industrial Bulk-Fed
6 Wood Pellet Central Heating Systems. The Staff
7 filed a Memorandum on May 27th, 2016,
8 recommending temporary increases and applicable
9 incentive levels and a number of other
10 substantive modifications. We scheduled this
11 public comment hearing for people to provide
12 input on Staff's recommendation. We will also
13 be accepting written comments through
14 June 10th, 2016. Before turning to the list of
15 public commenters, I will ask Mr. Wiesner to
16 briefly set the scene for us.
17 MR. WIESNER: Thank you, Mr.
18 Chairman. I'm Dave Wiesner, Staff attorney.
19 With me today are Barbara Bernstein, Karen
20 Crampton and Tanya Wayland, all with the
21 Sustainable Energy Division.
22 As you noted, Staff is proposing
23 a package of modifications to the commercial
24 and industrial rebate program for wood pellet

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1 furnaces and boilers. The primary driver for
2 this is our observation that the industry has
3 slowed down considerably. The number of
4 applications that Staff has received for the
5 rebate program has dropped considerably over
6 the past year, and we believe, based on
7 discussions with stakeholders, that this is
8 largely due to the drop in oil prices, which
9 makes the wood pellet systems not appear as
10 competitive as they might otherwise be, and
11 that has depressed the market considerably. As
12 a result, Staff is proposing what we've
13 characterized as a "temporary" increase in the
14 incentive level up to 40 percent of the total
15 system cost, to a maximum limit of \$65,000.
16 We've characterized this as "temporary," as I
17 said. There is no mechanism for it to be
18 automatically reduced, nor is there any sunset
19 date specified. However, it is our expectation
20 that Staff would consider to monitor market
21 conditions and keep an eye on oil prices, and
22 if the market conditions change in a material
23 way because oil prices tick up again, to come
24 back to the Commission and probably propose a

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1 decrease in the incentive level to reflect
2 those changed market conditions.
3 In this case, as contrasted with
4 the residential program, there are no fuel
5 storage rebate adders being proposed. However,
6 in this program, at least for the larger
7 systems, 200,000 Btu per hour and above, the
8 Staff is proposing that those larger systems be
9 required to become eligible for thermal RECs.
10 And in order to assist those installations in
11 achieving that goal, Staff is proposing that
12 there be a \$5,000 per system adder to assist in
13 the installation of thermal metering equipment
14 that would comply with the 2500 rules for
15 thermal REC heat measurement and verification.
16 As with the residential program,
17 we heard from certain stakeholders that we
18 should consider opening up the eligible fuel
19 sources to include processed dried chips in
20 addition to fuel wood pellets. And at this
21 time, Staff is not proposing that the
22 eligibility standards be changed to permit
23 chips in addition to pellets, primarily, again,
24 because of the interest in continuing

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1 MR. DRESSER: Dutch Dresser, Maine
2 Energy Systems. My remarks will be exceedingly
3 brief. They haven't changed much from a few
4 minutes ago.
5 I want to endorse the
6 recommendations of Staff. I think they're
7 right on target. Once again, I find RECs to
8 have particularly long-term value to the
9 industry, so I heartily endorse the notion that
10 you support metering equipment to get more
11 people able to take advantage of the RECs and
12 to sort of preempt the question. I would favor
13 the addition of processed dried chips in the
14 name of equity. Thank you.
15 CHAIRMAN HONIGBERG: Thank you,
16 Mr. Dresser.
17 Joe Short.
18 MR. SHORT: Joe Short, Vice-president
19 with the Northern Forest Center. And rather
20 than repeat everything I said earlier, I'll
21 submit written comment to that effect and just
22 say a few things here.
23 We are supportive of the Staff's
24 recommendations to temporarily increase the

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1 development of the fuel pellet industry, and,
2 in particular, its distribution networks, and
3 the concern that letting other fuels become
4 eligible would perhaps compromise that goal.
5 And, as with the emission -- excuse me -- as
6 with the residential program, Staff is also
7 proposing that the particulate matter emissions
8 standards be lowered to make the standards more
9 strict, in line with what is in place in
10 Massachusetts, and that represents a decrease
11 from the current level of .32 pounds per
12 million Btu's to .1. Our understanding is that
13 most of the equipment that's sold, that would
14 be eligible for a rebate here, can easily meet
15 this standard. And we believe this is the
16 appropriate time to lower the standard and
17 reflect that reality. I think that's all I
18 have for now.
19 CHAIRMAN HONIGBERG: All right. We
20 have six people who have indicated they want to
21 speak, and one indicates that maybe she'll
22 speak. We'll circle back to her. So we'll
23 take them in the order in which they signed up
24 and start with Dutch Dresser.

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1 rebate for these commercial and industrial
2 systems, require the larger systems be
3 certified as REC-eligible. And like
4 Mr. Dresser, I think the metering rebate adder
5 is a great idea and one that will be greatly
6 beneficial. We support the changes to the
7 emission standards as well. And we'd just make
8 the observation that, again, in this climate of
9 tough sell for these systems, that these larger
10 systems have particular value as potential
11 anchor users because they use larger volumes of
12 pellets. And we have seen in our own
13 experience continued momentum, or more momentum
14 on this side than on the residential side. So,
15 as you're looking for strategy to support this
16 industry through this difficult time, these
17 commercial rebates are particularly important.
18 Thank you.
19 CHAIRMAN HONIGBERG: Next speaker is
20 Dick Henry.
21 MR. HENRY: Thank you, Mr. Chairman,
22 and members of the Commission. My name is Dick
23 Henry. I hot zero, and we specialize in hot
24 water district energy systems. This rebate

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1 would be most helpful in that effort. And its
2 initial objective, as I understand it, was to
3 try and improve -- one of its objectives was to
4 improve the trucking capability of a
5 distribution system around the state. And I
6 think it's obvious that the energy density of
7 the fuel is related to how far you can truck
8 it. So, pellets are relatively energy dense;
9 green chips, at 48 percent-plus moisture, are
10 not so dense and very heavy. So, one of the
11 innovations that has taken place since this
12 rebate was initially implemented is the
13 creation of dry chips, which by definition are
14 dried down to 30 percent moisture or less. And
15 this is a relatively new market, but it's being
16 further encouraged by the fact that many of the
17 larger, more sophisticated boilers have the
18 capability of burning both pellets and/or dried
19 chips. The advantage of a dried chip is that
20 it's about -- at the moment, the current market
21 is about 37 percent less expensive per million
22 Btu's than pellets; so, pellets are going for
23 about \$240 a ton with 16.4 million Btu's, and
24 dried chips going for about \$120 a ton with

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1 So, this rebate not only would
2 help suppliers, but it would also help push the
3 technology on the drying side to go further.
4 As has been mentioned before,
5 there's a real interaction between the
6 commercial, industrial and residential markets.
7 And so the oil industry has been doing this for
8 years, where I am told an oil delivery truck
9 goes out, makes all its residential deliveries
10 and still has 200 gallons left in the tank, it
11 will go to the local high school and top off
12 the 6,000- or 10,000-gallon high school tank
13 and then doesn't have to deadhead back with
14 fuel. Then, if there's an emergency -- and I'm
15 not quite so sure about this. But if there's a
16 real emergency and someone's run out of oil and
17 there's a truck nearby, if he needs to, he can
18 go take some of that oil back from the high
19 school tank and make that emergency delivery.
20 So it makes a much more resilient delivery
21 system for the whole complex. So, potentially,
22 that same situation might emerge for dry chips.
23 And again, truck size lends
24 itself to less trucking costs. So, many of the

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1 13-plus million Btu's. So, this is a really
2 interesting development that the boiler
3 technology can now accept and could potentially
4 expand the market and reduce the operating
5 costs of these larger boilers that are being
6 used in schools, district energy systems and
7 large industrial situations.
8 So, I'm here to speak to
9 expanding the rebate to include dried chips at
10 30 percent more because I think this is going
11 to drive this market and develop more
12 innovative drying systems. So, right now when
13 we dry a chip, we're using a boiler often run
14 on wood chips itself that tries to dry the chip
15 down in two days. But we're storing a lot of
16 these chips for three or four or five months
17 during the summer, and the potential here is to
18 use solar thermal energy to further dry the
19 chip as it's sitting there waiting to be
20 utilized the following fall. Every percentage
21 of water that you can dry out of that chip is a
22 good thing, in terms of, again, increasing the
23 energy density for shipping and giving the
24 customer more Btu's per ton.

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1 pellet deliverers have trucks that can take
2 16 tons or less for domestic deliveries because
3 they're small and can get in and out of small
4 trucks. But it's a heck of a lot more cost
5 effective to be able to deliver, you know,
6 30 tons in a trailer truck. So, dry chips,
7 again, lend themselves to delivering larger
8 trucks to central systems. And in our case,
9 where, you know, we were developing a district
10 energy system for a local mill town, you know,
11 we would have put in four of these
12 1250-kilowatt boilers to serve the whole
13 downtown area, and it would have been very,
14 very helpful if, in addition to the T RECs, we
15 had some kind of a rebate to help with that
16 initial expenditure, because even one of those
17 1250-kilowatt boilers cost \$350,000 apiece. So
18 this would help the Cap X, and I think it would
19 significantly expand the market.
20 So, again, I really encourage
21 you to not choose the technology, but choose
22 the performance, which is, you know, 30 percent
23 moisture or less, and include dry chips in this
24 proposed rebate. Thank you.

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1 CHAIRMAN HONIGBERG: Commissioner
2 Scott has a question.
3 CMSR. SCOTT: Thank you. Presuming
4 we were to adopt the more stringent emissions
5 requirements, and presuming we were to move
6 beyond just wood pellets, you were very
7 particular in your talk to us to say dry chips.
8 MR. HENRY: Correct.
9 CMSR. SCOTT: Do we really need to be
10 that particular with that emission standard?
11 Because my guess would be a wet wood chip would
12 not meet that requirement.
13 MR. HENRY: Well, that's a good
14 point. And you made one of the points that I
15 forgot to make in my talk, which was, the drier
16 the chip, the more easy the emissions controls
17 and less expensive the emissions controls can
18 be. I think, for the time being, you're
19 probably right. But I think there's a much
20 larger green chip market out there that is
21 pretty well developed. And what needs the
22 incentive right now is these chips of
23 30 percent or less. And the thing about the
24 green chip market is there's no value added

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1 level. I agree with the Staff that an
2 additional fuel storage rebate adder is not
3 necessary for commercial and industrial systems
4 because, almost by definition, they're
5 installing systems that can take a full
6 truckload, quantity deliveries. They don't
7 need any extra assistance.
8 With respect to the requirement
9 that systems over 200,000 Btu be required to be
10 certified as eligible for participation in the
11 RPS thermal REC program, I guess I'm generally
12 supportive of that. But I will say I do hope
13 that, if and when the Commission reopens the
14 PUC 2500 rules, it will revisit the question of
15 what is a small system and what is a large
16 system, and where is that drawing line, and
17 also revisit the stringency of its requirements
18 around metering for small systems. Metering is
19 a -- when the rules were being written, it was
20 sort of an amorphous concept. And as we've
21 come to understand the technical complexities
22 of metering, the cost of metering, the cost of
23 stamped New Hampshire engineer certification of
24 the meters, which is required by the PUC 2500

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1 there. You know, that's just coming out of the
2 woods and going to the boiler -- coming out of
3 the woods, coming out of the chipper. I mean,
4 some chips are delivered six hours after
5 they're chipped. And it seemed to me the
6 intent of this was to get a value-added product
7 that would help improve the distribution
8 system. And the distribution system for green
9 chips right now is, you know, pretty well
10 developed and doesn't need the help. And I
11 think, given the limited funds that you have,
12 it would be more advantageous to put the rebate
13 dollars into these value-added products rather
14 than a green chip.
15 CMSR. SCOTT: Thank you.
16 CHAIRMAN HONIGBERG: Next speaker is
17 Charlie Niebling.
18 MR. NIEBLING: Thank you, Mr.
19 Chairman, members of the Commission. I'm
20 Charles Niebling, partner with Innovative
21 Natural Resource Solutions, representing New
22 England Wood Pellet today.
23 I want to support the Staff's
24 recommendation regarding the increase in rebate

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1 rules, what we've come to learn is that the
2 combined effect of all those requirements
3 basically precludes any meaningful
4 participation by smaller systems in the RPS
5 Thermal REC Program, and that dividing line is
6 considerably higher than 200,000 Btu's.
7 So there's a whole, sort of "no
8 man's land" of projects that the incentive just
9 is not sufficient enough to offset the
10 administrative and compliance costs. That's an
11 issue for another day, but it's relevant to
12 this whole question because you're saying now
13 that you have to be REC-eligible. Doesn't mean
14 you have to sell your RECs, but you have to be
15 REC-eligible, which means you have to go
16 through the whole certification process, even
17 with the adder for the meters, which is
18 tremendously helpful. You've got the
19 engineers' costs, you got the independent
20 monitor costs. And for a lot of these smaller
21 system owners, it's a rather intimidating
22 process.
23 It may not seem that way to you
24 on the receiving end, Barbara, but for a little

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1 school district in the middle of nowhere, it's
2 quite an undertaking to get approved by the
3 PUC.

4 CHAIRMAN HONIGBERG: Mr. Niebling,
5 why don't you direct your comments to us rather
6 than Staff.

7 MR. NIEBLING: I'm sorry. My
8 apologies. Thank you for that reminder.

9 So, that's my comment on that.

10 And I do support comments made
11 by the previous speaker with respect to
12 extending qualification of the commercial and
13 industrial rebate to refined dry chips.
14 Another speaker may be able to speak to this,
15 but I believe the acronym "PDC" is trademarked,
16 and I would avoid using it to describe this
17 product. I would come up with a more generic
18 term for the product or for the particular
19 dried, refined chip fuel.

20 And one reason -- to Mr. Scott's
21 question -- to Commissioner Scott's question, I
22 think it makes sense to draw a line between
23 refined dry chip and just conventional chips or
24 green chips, is that dry chips can be delivered

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1 comments. You mentioned the potential for dry
2 chips to be pneumatically delivered. It raised
3 a question in my mind: Can the same,
4 potentially the same delivery truck, pneumatic
5 delivery truck, do pellets and/or wood chips?

6 MR. NIEBLING: The gentleman from
7 Froling Energy may be able to speak to that
8 based on direct company experience. I can't
9 answer that.

10 CMSR. SCOTT: He's shaking his head
11 "yes," but I'll wait for him to talk. No?
12 Yes, maybe, I think. Thank you.

13 And my other question was, I was
14 a little bit unclear where you landed on the
15 requirements for T REC eligibility. So, were
16 you supporting it? Or were you saying there's
17 a hole here, and perhaps we don't do it? I
18 didn't quite get your punch line.

19 MR. NIEBLING: I believe it's
20 appropriate for the PUC to require recipients
21 of commercial and industrial rebates to take
22 steps to qualify their systems for REC
23 eligibility. That fulfills the purpose of
24 362-F and the intent behind the Renewable

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1 pneumatically. They can be delivered through
2 truck technology that is comparable in many
3 respects to the pellet technology. It may not
4 necessarily be the same truck, but the
5 technology does exist to deliver that fuel
6 pneumatically into silo storage, similar to
7 pellet storage. So I think that's another
8 justification for making a distinction between
9 a 30-percent moisture content chip and a
10 conventional chip, such as the type of fuel
11 that bigger schools and the wood-fired power
12 plants are burning.

13 The emission standard, I
14 honestly don't know whether these semi-dry chip
15 boilers can meet that .1 pounds per million Btu
16 without an electrostatic precipitator or other
17 significant state-of-the-art back-in controls
18 or not. Perhaps another speaker can address
19 that question as well. But that may be an
20 effective dividing line right there. Thank
21 you.

22 CHAIRMAN HONIGBERG: Commissioner
23 Scott.

24 CMSR. SCOTT: Thank you for your

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1 Energy Fund. I just think 200,000, I think you
2 need to raise that to half a million Btu,
3 150 KW. I think that's a dividing line above
4 which the administrative and compliance costs
5 to participate in the program justify the -- or
6 are offset by the revenue potential from the
7 program, and below that it's a stretch.

8 CMSR. SCOTT: Thank you.

9 CHAIRMAN HONIGBERG: The next
10 commenter is Jim Van Valkenburgh. Maybe we'll
11 get the cliff hanger answered right up front.

12 MR. VAN VALKENBURGH: I'm with
13 Froling Energy. And we are, I'd say, the first
14 manufacturers of what we call "PDC." It's a
15 dry chip. And one of the bases of our concept
16 of the dried chip was to be able to blow them
17 into a building and have an interior storage
18 area, perhaps in a basement or perhaps in some
19 other integrated structure, in a different way,
20 where you did not require having a big,
21 expensive infrastructure, such as when you
22 deliver with a semi-truck that has to drop it
23 off in a pit and so forth, like your typical
24 green chip operations. We are --

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1 (Court Reporter interrupts.)
2 MR. VAN VALKENBURGH: Anyway, so here
3 we are with a -- we're following in the
4 footsteps of northern Austria and other places
5 in Europe where dry chips have really come into
6 their own. And so we're in some ways just
7 mimicking that and saw this opening in the
8 market. We have four customers right now that
9 are using these. Some of them utilize the
10 rebate because they actually started out with
11 pellets because the systems can utilize
12 pellets. If you've got it set up for chips,
13 you can also put pellets in that same system,
14 with minor adjustments of the system. There's
15 a plate that would have to be put into the
16 silo. And these are sweeper-arm type of silos
17 instead of just funnel-type silos. But that's
18 a major distinction. And then another one is
19 in the boiler settings itself. You just have
20 to make sure that it is able to adjust itself
21 for the moisture content.
22 As far as the trucking goes, a
23 pellet truck cannot deliver dry chips, but a
24 dry chip truck can deliver pellets. So that

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1 infrastructure, even the businesses themselves,
2 had not thought about investing in this sort of
3 thing. And then, when this stimulus package
4 came along with the rebates, it was a very
5 positive development for the whole pellet
6 business, and we were very happy with that. It
7 got us established to be able to even think of
8 doing the dried chips.

9 So, again, a great round of
10 appreciation on good planning and good
11 execution on this program. We like the idea
12 that it's being expanded dollars-wise, and
13 everything that you said here I agree with. I
14 should say all the points that the Staff has
15 recommended here, we recommend as well. And we
16 feel that a lot of the comments Charlie made
17 here about the small boiler systems being
18 really below 500,000, I tend to agree with that
19 as well. But that's another debate.

20 The idea of including dry chips
21 in this program, I wouldn't want it to slow
22 down the update of this funding, this increase
23 in the funding, but I do like the idea, and I
24 think it's a matter of defining things.

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1 distinction might be interesting for future
2 developments where you might want to have a
3 business that could chip either one. Some
4 pellet boilers can burn the chips, but a lot of
5 them cannot. They're smaller, and they're just
6 not set up for that sort of thing. But it
7 seems like most of the boilers in that 500,000
8 Btu range and up can burn a dry chip. And they
9 burn them very efficiently, and they do meet
10 the standard. The bigger you go from that
11 area, it becomes a little more challenging for
12 these boilers to meet that emission particulate
13 criteria. But we do have boilers today that
14 can do this, and we're installing them and very
15 successfully operating them. So, I hope that
16 clears that point up.
17 And my comment on the dry chips
18 is we didn't expect people to be commenting
19 positively on this, and we're very happy that
20 they are. We find this is an important fuel,
21 and we also see that it's at the point that
22 pellets were not too many years ago, where
23 there weren't really many pellet trucks that
24 could deliver pneumatically. And the

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1 We do have this product -- and
2 Charlie's right. I don't know that we
3 necessarily have it trademarked, except that
4 just by example we've been out in the market
5 with this. But we do have -- the PDC idea --
6 our idea is this is a defined product. It's
7 not just a chip that is something. It is a
8 number of definitional steps that we like to
9 take. And it's also quality control. We have
10 people on staff that are testing this, just
11 like they do at a pellet plant, just to make
12 sure that it comes out the way it's supposed to
13 come out when it gets to the site where it's
14 being burned. So that's something I think we
15 want to think about. There's definitions that
16 we want to be sure that we would cover and
17 really that -- we like 25 percent moisture.
18 That's where we find it's the most stable. But
19 we'll say under 30 percent is perfectly fine
20 for a generic description of the product. And
21 we'd like to -- we also re-chip or take in
22 chips. But we take in chips and then chip them
23 down to about the size of a matchbook, a
24 traditional, old paper matchbook. That's

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1 really about the maximum size we like to see.
2 And that's because if we blow it into a
3 five-inch pipe a hundred feet, we don't want it
4 to be hung up by something that looks more like
5 a ruler or something on that order. So we have
6 to make sure that it does that. Plus, the
7 boilers themselves are not set up to have odd
8 sizes. So, this is a definition of a product
9 there. It's a fuel product, just the way
10 pellets have defined themselves very, very
11 well. This is something that needs to be done.
12 So, to jump into it real
13 quickly, we'd love to consult with you if you'd
14 like to know more about what PDCs are and how
15 we would define the marketplace. We'd very
16 much like to get involved in that, and we'd do
17 that tomorrow if you needed us to. But at this
18 point, again, I hate to see it slow down this
19 particular program. I think that's about it
20 right now. I can't think of any other issues
21 that were stated here.

22 CHAIRMAN HONIGBERG: Commissioner
23 Scott.

24 CMSR. SCOTT: Thank you for your

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1 probably doesn't matter, as long as the boiler
2 itself is able to deal with that. So if
3 somebody could come up with a boiler that deals
4 with bigger chips and does them well, I suppose
5 we wouldn't care if that was the case. We're
6 reacting to a very specific set of
7 circumstances that we've been confronted with
8 lately. And anything's possible. So I think
9 you're right; under 30 percent might be a smart
10 way to go.

11 CMSR. SCOTT: Thank you.

12 CHAIRMAN HONIGBERG: Our next
13 commenter, first name is Ted. Last name may be
14 Fontino?

15 MR. FOUNTAIN: How about a guy named
16 Fountain?

17 CHAIRMAN HONIGBERG: Fountain.

18 MR. FOUNTAIN: Sorry about that,
19 Chairman.

20 Thank you, Chairman and
21 Committee. Our company, New Day Energy, is a
22 specialist alternative energy installation
23 contractor. We specialize also in biomass
24 installations of modern pellet heating

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1 comments. I just want to hear your reaction.
2 I'm wondering, if we were to add dried wood
3 chips, do we have to -- how important would it
4 really be to define in detail what the chip is,
5 given that I think what I've heard, and based
6 on the history of this program so far, we were
7 trying to incent the delivery system. I think
8 we've already discussed between now and -- I
9 know you weren't at the 1:00 hearing -- but to
10 meet the emission standards, with my
11 background, I don't believe wet chips are going
12 to meet the emission standards, anyways. I
13 just wonder if something as simple as saying
14 "dried chips" would -- some small elaboration
15 may not be sufficient. I just hate to see us
16 spend a whole lot of time on being very
17 descriptive on what a chip is. But I'm just
18 curious as to your reaction to that.

19 MR. VAN VALKENBURGH: You're right.
20 I mean, it's just a matter of making sure that
21 everybody's in agreement. And we're pretty
22 open to your definition. I think, again, it's
23 kind of self-defining by your .01 percent and
24 so forth, the dryness factor. The size

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1 equipment.
2 I think I'd like to make the
3 comment today that I concur, and our company
4 endorses what the Staff has recommended to the
5 Commission for the increase in the rebate
6 program. Since our company's inception and
7 involvement in the biomass industry, the rebate
8 has been very helpful in the reluctance in the
9 market to adopt these types of European
10 technologies. So, as the oil prices I think
11 were the key moving fact in us looking into an
12 increase in the rebate, I'd like to just draw
13 back to that in particular, in that the market
14 itself is somewhat reluctant to continue
15 pushing ahead, residentially and commercially,
16 with these adoption -- adopting of these
17 systems because of the price of oil. So, an
18 increase in the rebate value would be
19 instrumental and very good for us to see a
20 continuation of installations. And I think I
21 like the comment made earlier, that these
22 larger systems are anchor systems. You know,
23 they use a larger volume of fuel, and so they
24 provide a point in the map for other

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1 installations nearby to look to. And so we
2 really think that continuing the process of
3 seeing this equipment being adopted is going to
4 require the rebate to kind of follow suit with
5 what the oil prices have done. So we think
6 this is a really smart move to keep things
7 flowing and keep the waters from becoming
8 murky, if you will, and slowing the boat down.
9 I agree that the chips -- I'd
10 like to make this comment also, that the chips
11 themselves are a great addition, and I really
12 feel it's a great product, and I like that it's
13 a defined product. But again, I would like to
14 just say that the idea of slowing down the
15 adoption of these Staff recommendations would
16 be, I don't know if "detrimental" is the right
17 word, but it would certainly slow down this
18 season. So we really see that the adoption of
19 these rebate value increases and changes would
20 certainly make this season worthwhile. If we
21 had to wait too long, it would just be too
22 difficult. That's it. Thank you.
23 CHAIRMAN HONIGBERG: Last person who
24 has signed the sheet is Laura Richardson, and

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1 able to roll out some new marketing materials,
2 new announcements saying that, you know, hey,
3 the rebate has gone up. And that's a way to
4 get back on people's radars. I think that will
5 be helpful for the market. So I applaud that
6 tremendously.
7 I also really like the idea of
8 the financial support for the REC metering. I
9 think that's a great idea, and that's part of
10 the transformation that the market needs to
11 have. I do agree with Mr. Niebling and think
12 that, you know, it is going to be really
13 difficult for a lot of the smaller systems to
14 be REC-eligible, and that perhaps raising that
15 threshold a little bit to start out would be a
16 good thing, and maybe in two years, or whenever
17 the Staff revisits this issue, that maybe at
18 that point they tighten things up a little
19 more, depending on how that metering equipment,
20 how the aggregation services, the monitoring
21 services, how all of that is maturing. But I
22 think it's good to really encourage that REC
23 metering.
24 I am a little concerned about

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1 she was the "maybe." Ms. Richardson, would you
2 like to speak?
3 MS. RICHARDSON: I would. Thank you
4 very much.
5 CHAIRMAN HONIGBERG: I thought you
6 might.
7 MS. RICHARDSON: Well, this is one of
8 my favorite topics, so I'm delighted to share
9 some insight. Thank you, Mr. Commissioner and
10 members of the Commission. My name is Laura
11 Richardson. I'm the Executive Director of the
12 Jordan Institute, and I've been tangentially
13 involved in the pellet program since its
14 inception back in the 2009-2010 time frame.
15 So I do have some comments about
16 the recent recommendations from the Staff and
17 heartily support pretty much all of the content
18 in their recommendation. I'm delighted about
19 the 40 percent increase and the increase in the
20 cap. I do think that Staff is monitoring the
21 situation with the fluctuating cost of fossil
22 fuels, and this step is warranted at this time.
23 I do also think that for the
24 market it will be a good thing for them to be

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1 quality control issues related to dried chips.
2 And I'm not at all concerned about Froling. I
3 know they do a terrific job with their products
4 and the attention to detail. But when new
5 market actors enter the scene, it may be really
6 hard for Staff to oversee the quality control
7 of what's really going on out there, as far as
8 the systems, as far as the fuel that's being
9 used and what ramifications may come of that.
10 So it might be good just to sit and again
11 revisit this question in a year or two.
12 And I would concur with a number
13 of other speakers, that, you know, let's move
14 this along as quickly as possible. You have a
15 tremendous workload in front of you this summer
16 with a lot of really important dockets. This
17 is right up there with them. Construction
18 season is in full swing right now, and if this
19 docket can be expedited, I think that would be
20 terrific. I think a lot of projects would
21 reconsider using these systems that have
22 currently shifted to some other kind of system.
23 So, those are my comments. I'm
24 quite grateful for the opportunity and thank

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1 you for considering them.

2 CHAIRMAN HONIGBERG: All right. Ms.
3 Richardson was the last person signed up to
4 speak. Is there anyone else who would like to
5 offer oral comments at this time?

6 [No verbal response]

7 CHAIRMAN HONIGBERG: All right. If
8 not -- Mr. Henry, I had a feeling maybe you
9 couldn't resist. I was a little surprised when
10 the hand didn't shoot up. Briefly, if you
11 would like to continue.

12 MR. HENRY: Very briefly, I just want
13 to make a point about the 150-kilowatt systems
14 and the T RECs. I think it's perfectly
15 appropriate, as Mr. Dresser mentioned, in the
16 residential market, that these systems qualify
17 for T RECs. But if we had a simpler system, a
18 la residential, to count the T RECs up to the
19 150-kilowatt system level, that would be
20 easier. And I think the amounts of fuel that
21 are being used are going to be comparatively
22 small. And just basing the T RECs generated
23 out of the value from the fuel consumed would
24 be a simple way to do that. Thank you.

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1 can help them along. So I think it's okay to
2 have the RECs down to those lower levels. And
3 I'm not sure if you need to loosen up the
4 standard or not, as far as the metering itself.
5 I'm not sure how you would do that in an
6 effective way.

7 Just one other thing on the
8 impact of RECs. And I look at it in a real
9 simple way: I like to compare everything right
10 down to a gallon of fuel oil. And what I see
11 is pellets right now are about \$2 a gallon on a
12 typical burn basis. So, how many -- basically
13 you say at the end of the year, how many
14 gallons of oil would I have burned and how much
15 dollar value of either pellets or chips did I
16 burn, and I divide that by the number of
17 gallons that that's equivalent to. And it ends
18 up to be about \$1.50 a gallon when you've got
19 RECs applied to pellets. And if you've got the
20 PDCs, or the chips, at the \$120 a ton level,
21 you actually are about \$1.38, \$1.40, say,
22 without RECs, and with RECs, 80 cents a gallon.
23 Very high impact information. And there's
24 not -- there's nobody buying oil at 80 cents a

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1 CHAIRMAN HONIGBERG: All right.
2 Anyone else who would like add anything? Yes,
3 Mr. Van Valkenburgh.

4 MR. VAN VALKENBURGH: Yes, just on
5 that point. We've put in some meters on one of
6 Dutch's boilers -- as a matter of fact, two of
7 them in the town of Hollis. And they went and
8 bought the meters and so forth. But the meters
9 are basically the same, whether you've got a
10 giant system or a tiny system. So, that \$5,000
11 on a commercial system is right on, I think.
12 You know, you might find some cheaper meters,
13 but they need to be quality meters, and
14 somebody needs to verify them. I know you have
15 a real need to have verification on this, and I
16 wouldn't want you to short that. I'm not
17 exactly sure if there's an easy way around it,
18 but I will say that it is cost-effective in the
19 end, especially if you pay for the meter.
20 These people are getting volunteers or they're
21 doing various things. It's a very confusing
22 process to get established into RECs. But on
23 the other hand, when you get some experienced
24 companies finally, we get that experience and

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1 gallon right now. And that's a New Hampshire
2 fuel that can be produced in many sectors of
3 this state by different companies. And it's
4 just a matter of really getting that going, I
5 think. And again, those are for larger
6 systems. Ten thousand gallons is the absolute
7 minimum to justify the extra expenses, so we
8 see. So, just know that most of ours are one
9 million Btu's, two million Btu's and up with
10 the dried chips.

11 CHAIRMAN HONIGBERG: Thank you. Is
12 there anyone else who wishes to add anything at
13 this time?

14 [No verbal response]

15 CHAIRMAN HONIGBERG: I'll remind
16 everyone that we will take written comments
17 until the end of next week.

18 Mr. Wiesner, you look like
19 you're pulling that microphone towards you.

20 MR. WIESNER: I apologize, Mr.
21 Chairman. I just wanted to note that during
22 the residential hearing we heard a couple folks
23 make an argument that there ought to be a
24 retroactive effect for the rebate incentive

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1 increase. And I'm not sure whether there's a
2 similar sentiment for this program, but I just
3 wanted to raise that.

4 [No verbal response]

5 MR. WIESNER: I guess not.

6 CHAIRMAN HONIGBERG: Seems like not.

7 All right. Then we will close the public
8 comment hearing and invite you to submit your
9 written comments by the end of next week, and
10 we will an issue order on this as quickly as we
11 can. Thank you all.

12 (Whereupon the Public Comment Hearing
13 adjourned at 2:55 p.m.)

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