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STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION
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April 30, 2015

Daniel A. Wilson, P.E.
Vice President
Wilson Engineering Services, PC
902 Market Street
Meadville, PA 16335

**Re: REC 15-081 Warwick Mills, Application for Interim Certification as a
Class I Thermal REC Eligible Facility**

Dear Mr. Wilson:

On March 5, 2015, the Commission received an application prepared by Wilson Engineering Services, PC (WES) on behalf of Warwick Mills. This application requests the Commission grant Warwick Mills interim certification for Class I Thermal renewable energy certificate (REC) eligibility pursuant to RSA 362-F:4 and New Hampshire Code of Administrative Rules Puc 2500, which became effective on December 6, 2014. Staff has reviewed the Warwick Mills application and requests the following information to complete the application and clarification to assist Staff's review.

- Warwick Mills has yet to secure an independent monitor. Please note that Puc 2505.09 (a) requires an independent monitor to verify the production of useful thermal energy from an eligible source and to report such production and REC calculation to the GIS. If an independent monitor has yet to be determined, how will the facility verify production from previous quarters and comply with Puc 2505.09? The PUC cannot grant interim certification without this provision being met.
- Assuming the issue of the independent monitor is resolved, the Commission has authority to grant the request for interim certification back to January 1, 2014 pursuant to PUC 2505.02(e), but the close of the trading period for the New England Power Pool Generation Information System for 2014 RECs was April 10, 2015. Staff is checking with the GIS to see if there is any recourse.
- Puc 2505.02(g) limits the ability to be issued RECs to the period from January 1, 2014, until 90 days after the rule's effective date, which is March 5, 2015. Since March 5 has passed and Warwick Mills has not updated its application pursuant to Puc 2505.02(g) to be issued RECs after March 5, 2015, Warwick Mills cannot be

eligible to be issued RECs under the interim provisions of Puc 2505.02(e) past March 5 unless the Commission grants a waiver. Therefore, Warwick Mills should request a waiver from the Commission for authority to continue to produce Class I-T RECs until the facility can meet the requirements of Puc 2506.04 and permanent certification. *See* Puc 201.05 (Waiver of Rules).

Finally, I was glad to hear that Warwick is pursuing meters and intends to meet the provisions of Puc 2506.04. Please contact me if you seek any additional guidance regarding these requests. Please refer to docket numbers **REC 15-081** 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

Please also send an electronic copy via e-mail 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. I look forward to continuing to work with you to complete review of this docket.

Sincerely,



Barbara Bernstein
Sustainable Energy Analyst

cc: Dan Wilson, WES
Marcel Alix, Warwick Mills, Inc.

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 #: 15-081-1 Printed: April 30, 2015

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
EXEC 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.