

September 6, 2018

Karen Cramton, Sustainable Energy Division Director
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: 2018 Renewable Portfolio Standard (RPS) Review (RSA 362-F:5)

Dear Ms. Crampton:

Thank you for offering stakeholders the opportunity to provide comments in this matter.

New Hampshire Electric Cooperative, Inc. (NHEC) is pleased to offer the following observations regarding the RPS.

In context of RSA-362-F:5 requirements for the Commission to review *"The adequacy or potential adequacy of sources to meet the class requirements of RSA 362-F:3"*, NHEC notes that there appears to be an imbalance in the obligations and supply for Class I thermal Renewable Energy Certificates (RECs). The NHEC obligation for this sub-class of REC is about 7,800 in 2018, rising to a forecast of nearly 14,000 in 2023 when the annual percentage stops increasing. Despite efforts to find and retain sources of supply for thermal RECs, NHEC is forecasting significant shortfalls in supply beginning in 2019, which may require Alternative Compliance Payments of about \$160,000 in 2019, increasing to \$380,000 in 2023.

NHEC requests the Commission take note of this issue and recommend legislative steps be taken to create more equilibrium in the supply and demand for thermal RECs. This could be

accomplished through, among other actions, adjustments to thermal REC obligations, broadening the technology/resource types that can be certified to produce thermal RECs, or both.

Sincerely,



Robert E. Howland
Power Resources Executive