



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner



August 9, 2013

NHPUC 12AUG13PM2:40

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

Re: Recommendation for "Conditional" Re-Certification as a Renewable Energy Source
Springfield Power, LLC GIS Unit ID #: MSS436 Docket No. **DE 09-104**
54 Fisher Corner Road
Springfield, NH 03284

Dear Ms. Howland:

The New Hampshire Department of Environmental Services (DES) has determined that Springfield Power, LLC (Springfield) is likely to meet the New Hampshire Public Utilities Commission (PUC) Renewable Portfolio Standards (RPS) requirements (Puc 2502.16) to be certified as a renewable energy source eligible to generate renewable energy certificates (RECs) for the third quarter of 2013. Springfield is once again maintaining an average particulate emission rate of less than or equal to 0.02 lbs/MMBtu as measured and verified by stack testing on May 16, 2013. In the past, Springfield has maintained its quarterly average nitrogen oxides (NOx) emissions rate at or below 0.075 lb/MMBtu as measured by the continuous emissions monitor (CEM), and DES anticipates that Springfield will continue to do so in the future. **DES recommends "conditional" re-certification of Springfield for the third quarter of 2013**, provided that NOx emissions data to be submitted to DES on or before October 30, 2013 results in a quarterly average emissions rate at or below 0.075 lb/MMBtu.

Beginning with the fourth quarter of 2009, DES originally recommended that the PUC certify Springfield for their wood-fired power plant as a renewable energy source, because Springfield had tested emissions and operated monitoring equipment as recommended by DES. At that time, the monitoring and test results indicated that Springfield met the RPS requirements.

Beginning with the fourth quarter of 2010, however, Springfield had not maintained an average particulate emission rate of less than or equal to 0.02 lbs/MMBtu as measured and verified by stack testing. DES recommended revocation of Springfield's certification for the fourth quarter of 2010 and each quarter thereafter. As stated above, however, Springfield completed stack testing in the second quarter of 2013 that resulted in an average particulate emission rate of less than or equal to 0.02 lbs/MMBtu once again.

If you have any questions regarding DES's recommendation, please contact me at joseph.fontaine@des.nh.gov or (603) 271-6794.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph T. Fontaine", with a stylized flourish at the end.

Joseph T. Fontaine
Trading Programs Manager
Air Resources Division

cc: Barbara Bernstein, NH PUC
Robert Olson, Esq. on behalf of Springfield