

Commissioners: Francis J. Hoey, III Robert H. Griffin Raymond H. Feyre

Manager: James M. Lavelle

June 28, 2010

Ms. Maureen L. Reno Utility Analyst III New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

Dear Ms. Reno:

SUBJECT:

DE 10-151, Holyoke Gas & Electric Department Certification Application for the

Existing Small Hydroelectric Facilities Pursuant to RSA 362-F - Request for

Information

Please find below HG&E's responses to the New Hampshire Public Utilities Commission (Commission) request for additional information relating to HG&E's application requesting certification for fourteen (14) hydroelectric facilities as Class IV renewable energy sources. This information is in reference to Docket DE 10-151.

1. Pursuant to NH Code of Administrative Rule Puc 2505.02 (b) (8), please provide the documentation that HG&E is a party to a currently effective interconnection agreement for each of the 14 facilities mentioned in your application

HG&E's existing small hydro facilities are all interconnected into our distribution system which we own and maintain. All of the hydro facilities are owned, operated and maintained by HG&E and are located within the City of Holyoke. The generation stays within the City of Holyoke. Each facility has commercial operation dates from the early 1900's. Harris Energy was registered with ISO-NE effective December 1, 2006. Valley Hydro (Station No. 5) was registered effective April 1, 2008 and all other hydro facilities listed in this application have been registered with ISO-NE prior to 1999. HG&E has never been required by ISO-NE to undertake interconnection agreements for any of its hydro facilities. Only new units that are determined to be FERC jurisdictional require an interconnection agreement with ISO-NE for HG&E.

2. Please define the term "physically and electrically separate facilities", which is used to describe some of the facilities listed in your application.

During the registration process with ISO-NE, HG&E aggregated several small hydro facilities into one ISO-NE Asset (Harris Energy, ISO-NE Asset ID #12168 and HG&E Hydro/Cabot 1-4, ISO-NE Asset ID #957).

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HG&E Hydro/Cabot 1-4 is the ISO-NE Asset comprised of four separate Run-of-River Project Facilities (Holyoke No. 1, Holyoke No. 2, Holyoke No. 3 and Holyoke No. 4 as described in the application of which each have separate FERC licenses).

Harris Energy is the ISO-NE Asset comprised of eight separate run-of-river Project Facilities with only three of the eight currently active (Albion Mill A, Albion Mill D and Gill Mill D as described in the application of which have separate FERC licenses).

The application is requesting certification for each of the four **hydro facilities** comprising the ISO-NE HG&E Hydro/Cabot 1-4 Asset and not the ISO-NE Asset itself. And similarly, certification is requested for each of the three active **hydro facilities** comprising the ISO-NE Harris Energy Asset.

The term "Physical" was to distinguish that materially these ISO-NE Assets are comprised of separate facilities with their own intake, penstock, powerhouse and tailrace facilities and that are located on different areas of the canal system (See figure 3 of the application).

The term "Electrically" was also used to clarify that the energy produced is from the separate hydro facilities and not the one single ISO-NE Asset. Each hydro facility has separate electrical systems and is metered separately. The separate meters are summed and then reported to ISO-NE as one total.

3. Are the Albion Mill A and Albion B facilities "physically and electrically" separate facilities?

Yes. See response to Question 2. Although they share the name Albion, these two facilities do have separate intake, penstock, powerhouse, tailrace and electrical facilities.

4. The FERC licenses for the facilities prescribe spilling water over the Holyoke Dam during high water flow periods to prevent migrating fish populations from entering the canal system. Please provide documentation, if available, that such mitigation measures have minimized the amount of fish from being trapped in the canal.

This appears to be a reference to a condition in the FERC license (pre 1998). In October 2002, HG&E installed the downstream Louver Bypass Facility (including the Full Depth Louvers and Louver Bypass Discharge Pipe) located in the Canal System. The purpose of the Louvers is to create hydraulic conditions that guide the approaching fish migrating downstream to the entrance of the bypass. The downstream fish passage Louver Facility begins 554 ft downstream of the Canal Gatehouse. The Louver extends across the First Level canal at an angle and is 440ft long. The Louver diverts fish from entering the Canal System into a pipe that bypasses the generating units and transports fish into the Hadley Station tailrace (see figure 2 of application).

Since the installation of the Louver Bypass Facility in October 2002, this condition doesn't exist.

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5. Is there any documented fish migration during low water flow periods? If yes, what measures are taken during these periods.

No. There is no documented fish migration during low water flow periods.

6. Has HG&E installed upstream and downstream fish passages at any of the other facilities besides the Hadley Falls Station?

No. The downstream Louver Bypass Facility mentioned in Question 4 prevent fish from entering the Canal System. The design, water flow, and height of the Canal tailraces that discharge back into the Connecticut River, make it impossible for upstream migrating fish from entering the Canal System.

7. Please provide the latest fish monitoring reports from the Hadley Falls Station and any other facility's fish passages, if installed.

Please see attached.

Please contact me if you have any questions or require additional information.

Sincerely,

Jeanette A. Sypek

Holyoke Gas & Electric Department

Sr. Energy Resources Coordinator

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