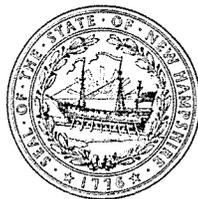


THE STATE OF NEW HAMPSHIRE

CHAIRMAN  
Martin P. Honigberg

COMMISSIONERS  
Robert R. Scott  
Kathryn M. Bailey

EXECUTIVE DIRECTOR  
Debra A. Howland



**PUBLIC UTILITIES COMMISSION**  
21 S. Fruit Street, Suite 10  
Concord, N.H. 03301-2429

TDD Access: Relay NH  
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:  
[www.puc.nh.gov](http://www.puc.nh.gov)

October 19, 2015

Neil McKellar  
Electricity N.H., LLC  
c/o Provider Power  
306 Rodman Road  
Auburn, ME 04211

Re: DM 12-075, Electricity N.H., LLC - 2014 Renewable Portfolio Standard  
Compliance Waiver of Puc 2503.05(c)(2)

Dear Mr. McKellar:

On September 23, 2015, Electricity N.H., LLC (ENH) requested a waiver of N.H. Code Admin. Rules Puc 2503.05(c)(2) to allow banking of 106 Class I (vintage 2014) renewable energy certificates (RECs) retired in its NEPOOL-GIS (GIS) reserve account for future compliance use in New Hampshire, even though these RECs are not shown as retired in its GIS "My Settled Certificates Disposition" report because they were not retired in its retail subaccount. In connection with its 2014 New Hampshire Renewable Portfolio Standard (RPS) compliance, ENH settled 23,683 Class I RECs and sought to bank another 106 Class I RECs for future use in its GIS reserve account. ENH confirmed in its waiver request letter that the Class I RECs retired in its GIS reserve account "have not been and will not be sold, transferred or used for compliance in any other state."

Commission Staff filed a memorandum on October 15, 2015, in which it analyzed ENH's waiver request and recommended that the Commission grant a one-time waiver of Puc 2503.05(c)(2) so that ENH may bank its 106 Class I (vintage 2014) RECs for future compliance. Citing the Commission's authority to grant rules waivers under N.H. Code Admin. Rules Puc 201.05, Staff asserted that ENH has satisfied the "purpose of the rule ... by an alternative method" and therefore the requested waiver would serve the public interest. Staff maintained that, because ENH retired the 106 Class I RECs in its GIS reserve account and has not used the RECs in another state or jurisdiction, its banking of these RECs for future use is appropriate and serves the purpose of the RPS program.

The Commission has approved Staff's recommendation that a one-time waiver of Puc 2503.05(c)(2) be granted as requested by ENH, having found that the waiver would serve the public interest and not disrupt the orderly and efficient resolution of matters before the Commission. Accordingly, ENH may bank the 106 Class I (vintage 2014) RECs retired in its GIS reserve account for future compliance with the New Hampshire RPS.

Sincerely,

A handwritten signature in cursive script that reads "Debra A. Howland".

Debra A. Howland  
Executive Director

cc: Service List/Docket File

**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.

Executive.Director@puc.nh.gov  
alexander.speidel@puc.nh.gov  
amanda.noonan@puc.nh.gov  
Christopher.aslin@doj.nh.gov  
david.goyette@puc.nh.gov  
jrodier@mbtu-co2.com  
kevindeannow@gmail.com  
margaret.raymond@puc.nh.gov  
mleclerc@electricityme.com  
neil.mckellar@providerpower.com  
rag@orr-reno.com  
tfrench@bernsteinshur.com  
tom.frantz@puc.nh.gov

Docket #: 12-075-1      Printed: October 19, 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.