

# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** December 12, 2013

**AT (OFFICE):** NHPUC

**FROM:** Barbara Bernstein   
Sustainable Energy Analyst

**SUBJECT:** DE 13-265, GDF SUEZ North American, Inc. - Application for Certification as a REC Eligible Facility - Pinetree Power-Fitchburg, Inc.  
**Staff Recommends that Eligibility be Granted.**

**TO:** Chairman Amy L. Ignatius  
Commissioner Robert R. Scott  
Commissioner Michael Harrington  
Debra A. Howland, Executive Director and Secretary

**CC:** Jack K. Ruderman, Director of the Sustainable Energy Division   
Suzanne Amidon, Staff Attorney

### *Summary*

On September 25, 2013, the Commission received an application requesting Class III New Hampshire renewable energy certificate (RECs) eligibility for the 18 megawatt (MW) Pinetree Power-Fitchburg, Inc. (Pinetree Power – Fitchburg) biomass facility located in Westminster, Massachusetts pursuant to RSA 362-F. Staff reviewed the application, and on November 7, 2013 requested additional information.

RSA 362-F:11 III provides that the Commission may certify a biomass facility on a conditional basis, pending the verification of compliance from the New Hampshire of Department of Environmental Services (DES) of nitrogen oxide (NO<sub>x</sub>) and particulate matter (PM) emissions results. Staff also notified Pinetree Power – Fitchburg that DES would need to provide the Commission with a recommendation for conditional approval.

On November 27, 2013 staff received additional information from Pinetree Power – Fitchburg and on December 3, 2013, the Commission received a letter from DES recommending the Commission grant Pinetree Power – Fitchburg conditional approval for Class III REC eligibility based on the agency's review of particulate and NO<sub>x</sub> emission rates and monitoring requirements. DES anticipates that NO<sub>x</sub> emissions from the facility will meet the requirements of Puc 2502.16 in the fourth quarter of 2013.

### *Analysis*

To qualify Pinetree Power – Fitchburg as a REC eligible facility, Puc 2505.02 (b) requires the source to demonstrate its eligibility by completing the following:

- 1.) *The name and address of the applicant:* The applicant is Pinetree Power – Fitchburg, Inc., 200 Glastonbury Boulevard, Suite 303, Glastonbury, CT 06033.
- 2.) *The name and location of the facility:* Pinetree Power – Fitchburg is located at 2 Rowtier Drive, Westminister, MA 01473.
- 3.) *The ISO-New England asset identification number (if available).* The ISO-New England asset identification number is ISO-NE#: 538.
- 4.) *The GIS facility code if available.* The NEPOOL GIS facility code has been verified as MSS 538.
- 5.) *A description of the facility including fuel type, gross nameplate generation capacity, the initial commercial operation date, and the date it began operation, if different.* The Pinetree Power – Fitchburg power station is an 18 MW waste wood and natural gas-fired power facility that began commercial operation on November 1, 1992. The facility burns whole tree chips, derived locally from forest management and land clearing operations, making up 99% of fuel usage. The remaining 1% derives from natural gas used for startups, flame stabilization and emissions control.
- 6.) *If a biomass source, NO<sub>x</sub> and particulate matter emission rates and a description of pollution control equipment or proposed practices for compliance with such requirements.* Air pollution control equipment consists of Selective Non-Catalytic Reduction (SNCR) technology for NO<sub>x</sub> emissions control, a fabric filter (Baghouse) for Particulate Matter (PM) control, and a sodium bicarbonate sorbent injection system for Sulfur Dioxide (SO<sub>2</sub>) control.
  - a. Pursuant to Puc 2502.16, a quarterly average NO<sub>x</sub> emission limit of 0.075 lb/MMBtu must be met. Pinetree Power-Fitchburg has installed a continuous emissions monitoring system to record NO<sub>x</sub> emissions as required by Massachusetts DEP Final Operating Transmittal No. 108009. Based on a review of third quarter 2013 data, DES anticipates that NO<sub>x</sub> emissions from the facility will meet the requirements of Puc 2502.16<sup>1</sup> and RSA 362-F:12.<sup>2</sup>
  - b. A PM emission test was performed for Pinetree Power-Fitchburg on June 26 and 27, 2013. The emission test was performed in accordance with Massachusetts DEP Final Operating Transmittal No. 108009. The results of the test indicate the actual PM emission in lb/MMBtu was 0.012

---

<sup>1</sup> Pursuant to Puc 2502.16, the quarterly average emission rate for NO<sub>x</sub> is less than or equal to 0.075 lb/MMBtu.

<sup>2</sup> Pursuant to RSA 362-F:12, any qualifying biomass source shall install and operate a continuous emissions monitor that meets DES standards to verify NO<sub>x</sub> emissions.

lb/MMBtu which meets the standard required in Puc 2502.16<sup>3</sup> and RSA 362-F:12.<sup>4</sup>

- 7.) *All other necessary regulatory approvals, including any reviews, approvals or permits granted by the department.* DES has recommended that the Commission grant Pinetree Power – Fitchburg conditional approval as a Class III facility based on its capability to meet the emissions standards pursuant to RSA 362-F:11, and Puc 2504.04. In addition, Pinetree Power – Fitchburg must continue to perform annual stack testing, report the results to DES and the results must verify that the facility is in compliance with Puc 2505.04. In addition, Pinetree Power – Fitchburg provided a Final Air Quality Operating Permit issued by the Massachusetts, Department of Environmental Protection on April 23, 2013 and a Final Approval of a Limited Plan Application for Fuel Utilization Facility from the Massachusetts Department of Environmental Protection.
- 8.) *Proof that the applicant either has an approved interconnection study on file with the commission, is a party to a currently effective interconnection agreement, or is otherwise not required to undertake an interconnection study.* An Interconnection Agreement Between Fitchburg Gas and Electric Light Company and KES Fitchburg, L.P. has been provided.
- 9.) *If a biomass facility, proof that a copy of the completed application has been filed with the department.* Based on review of their application DES has recommended that the Commission grant Pinetree Power – Fitchburg conditional approval as a Class III facility.
- 10.) *A description of how the generation facility is connected to the distribution utility.* Electricity generated is delivered to Unitil (Fitchburg Gas and Electric Light Company) through underground transmission lines.
- 11.) *A statement as to whether the facility has been certified under another non-federal jurisdiction's renewable portfolio standard and proof thereof.* Pinetree Power – Fitchburg has not been certified under another non-federal jurisdiction's renewable portfolio standard; however, an application has been made and is pending with the CT PURA for consideration as a CT Class I renewable resource.
- 12.) *A statement as to whether the facility's output has been verified by ISO New England.* The application includes a statement that the output of the facility is settled in the ISO-NE market systems and is therefore verified through the ISO-NE market system.
- 13.) *A description of how the facility's output is reported to the GIS if not verified by ISO-England.* The facility's output is reported to the GIS.

---

<sup>3</sup> Pursuant to Puc Puc 2502.16, the average emission rate for PM is less than or equal to 0.02 lb/MMBtu.

<sup>4</sup> Pursuant to RSA 362-F:12, any qualifying biomass source shall conduct an annual stack test in accordance with DES standards to verify PM emissions.

- 14.) *An affidavit by the owner attesting to the accuracy of the contents of the application.*  
An affidavit signed by Eric A. DeBarba, Director- New England Origination, Pinetree Power – Fitchburg, was provided with the original application.
- 15) *The name and telephone number of the facility's operator, if different from the owner.*  
The facility is operated by GDF SUEZ Energy North America Inc.
- 16) *Such other information as the applicant wishes to provide to assist in classification of the generating facility.* Pinetree Power – Fitchburg is a sister unit to Pinetree Power – Tamworth, Inc. (Tamworth, NH) and Pinetree Power, Inc. (Bethlehem, NH). Both of these facilities have been classified as NH Class III Renewable Energy Sources.

***Recommendation***

Staff has reviewed the Pinetree Power – Fitchburg facility application, the additional information provided, and the DES letter recommending conditional approval and can affirm the application is complete pursuant to Puc 2500. The applicant has provided all the necessary information and documentation demonstrating that Pinetree Power – Fitchburg meets Class III eligibility. Staff recommends that the Commission grant Pinetree Power – Fitchburg conditional approval for Class III eligibility effective December 3, 2013. This approval is conditioned upon the Commission receiving notice from DES on a quarterly basis that the facility complies with applicable emissions standards.