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THE STATE OF NEW HAMPSHIRE



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NHPUC 18DEC13AM10:47

December 18, 2013

Michelle Hamm  
Manager- Environmental Services  
Monadnock Paper Mills, Inc.  
117 Antrim Road  
Bennington, NH 03442-4205

**Re: DE 13-318, Monadnock Paper Mills Application for Certification of the  
Monadnock Dam Power Station as a Class I REC Eligible Facility**

Dear Ms. Hamm;

On November 7, 2013, the Commission received an application from Monadnock Paper Mills, Inc. requesting Class I renewable energy certificate (REC) eligibility for the increased incremental output generated by the Monadnock Dam Power Station (Monadnock Station) pursuant to Puc 2505.05. Staff has reviewed the application and requests that the following additional information be submitted in order to complete the application for review and determination of eligibility:

1. Is the Monadnock Station a "customer-sited source" under the New Hampshire RPS law? A "customer-sited source" is defined in RSA 362-F:2, V as "a source that is interconnected on the end-use customer's side of the retail electricity meter in such a manner that it displaces all or part of the metered consumption of the end-use customer."<sup>1</sup>
2. Is the electric generation output of the Monadnock Station reported to ISO New England?
3. If not, then how will the output be reported to the NEPOOL-GIS administrator?
4. Is Monadnock Station registered with the NEPOOL-GIS system? RSA 362-F:6, I requires the Commission to use the NEPOOL-GIS system for REC tracking and reporting, and the GIS administrator requires that eligible renewable energy generation facilities be registered in their system.

<sup>1</sup> <http://www.gencourt.state.nh.us/rsa/html/XXXIV/362-F/362-F-mrg.htm>.

5. Will Monadnock Station use an independent monitor to read meters and report output to the GIS administrator, and, if so, who will perform this function? Note that, pursuant to RSA 362-F:6, II, electricity production from *customer-sited sources* that is not tracked by ISO New England must be monitored and verified by an independent entity designated by the Commission, which may include electric distribution companies.
6. Was the addition of flashboards to the Monadnock Station dam required by law, regulation, order or directive? If so, please provide a copy of any such order or directive, or a citation to any such law or regulation.
7. How will any power plant station service be excluded from the Monadnock Station generation output reported to the GIS administrator? Please describe the relevant metering configuration, monitoring procedures, and any calculations that will be used to determine the net amount of output to be reported. "Station service," or "parasitic load", means the portion of electric production used in the generation of power at the generation facility.<sup>2</sup>
8. The following should be included with the application or a statement made that none exists:
  - (a) FERC project license and any amendments and annual license renewals or extensions (Project No. 6597);
  - (b) New Hampshire state permits and approvals;
  - (c) Interconnection agreement or approved interconnection study; and
  - (d) RPS certifications obtained from other states (if certification has been approved in other states).

The Commission seeks to clarify these issues to ensure that the record supports a determination regarding the Monadnock Station's eligibility as a Class I source of RECs based on its increased incremental electricity output resulting from capital investments made after January 1, 2006 with the successful purpose of improving the efficiency or increasing the output of renewable energy from the facility.

Please contact me to set up a meeting with Commission Staff to provide you with additional guidance regarding these requests, if you so desire.

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<sup>2</sup> New Hampshire has disqualified station service from REC eligibility and requires that station service be accounted for and subtracted from the reported electrical generation output of a renewable energy source. See DE 09-212, Indeck Alexandria, <http://www.puc.nh.gov/Regulatory/Docketbk/2009/09-212.html>. For an example of an approved methodology developed to subtract station service from generation output, see DE 12-210, Spaulding Hydro, <http://www.puc.nh.gov/Regulatory/Docketbk/2012/12-210.html>.

Please refer to docket number **DE 13-318** in your correspondence with the Commission. Your response should include an original and two copies sent to the attention of the Commission's Executive Director:

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429  
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Please also send an electronic copy via email to [executive.director@puc.nh.gov](mailto:executive.director@puc.nh.gov), and copy me at [barbara.bernstein@puc.nh.gov](mailto:barbara.bernstein@puc.nh.gov). Should you have any questions, please do not hesitate to contact me. My direct line is 603-271-6011. I look forward to working with you.

Sincerely,



Barbara Bernstein  
Sustainable Energy Analyst

cc: David K. Wiesner, NHPUC Staff Attorney  
Jack Ruderman, Director, Sustainable Energy Division