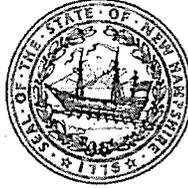


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STATE OF NEW HAMPSHIRE



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NH-PUC 23APR15PM3:39

April 22, 2015

Wayne G. Fillion, P.E.
Yeaton Associates, Inc.
66 Jackson Street
Littleton, NH 03561

Re: DE 14-296 Androscoggin Valley Hospital, Application for Certification as a Class I Thermal REC Eligible Facility

Dear Mr. Fillion:

On March 10, 2015 the Commission received an application prepared by Yeaton Associates, Inc. (Yeaton Associates) on behalf of Androscoggin Valley Hospital. This application follows the interim certification granted by the Commission on December 5, 2014 for Class I Thermal renewable energy certificate (REC) eligibility for Androscoggin Valley Hospital's thermal biomass facility pursuant to RSA 362-F:4 and New Hampshire Code of Administrative Rules Puc 2500 finalized December 6, 2014. Staff has reviewed the Androscoggin Valley Hospital application and requests the following information and clarification to complete the application review.

- Please provide a detailed explanation as to why the decision was made to not follow the provisions of Puc 2506.04 and to instead seek certification under Puc 2506.06. Staff's understanding is that the inclusion of Puc 2506.06, Request for Alternative Method for Measuring Thermal Energy, was meant to allow for innovations that weren't anticipated in the development of the rule. Please note that Puc 2506.06 (3) requests a description of the metering method otherwise required by these rules and the reasons it cannot be used with the applicant's facility.

The current application states the following:

- *Mass flow rate of boiler feedwater, is not measured directly as required by Puc 2506.04(m), because no feedwater flow meter was installed during construction.*
- *(h_{out}) and (m_{out}) are daily values in the above equation not hourly. The reason for this is that although the mass flow rate is measured hourly electronically, temperature is not recorded hourly, and so the (multiplicative) product (h_{out}) x (m_{out}) can only be reported as a daily average value. Please provide a detailed explanation for not installing a meter that could meet the requirements of Puc*

2506.04. Is a daily manual recording as accurate as the hourly reporting required in Puc 2506.04? Also explain how the alternative method is equivalent to the requirements of Puc 2506.04.

The Commission seeks to clarify these issues to ensure that the record supports a determination regarding Androscoggin Valley Hospital's eligibility as a Class I thermal source of RECs.

In addition, since Puc 2505.02(g) limits the ability to be issued RECs to the 90 day interim period after the rule's effective date, Androscoggin Valley Hospital should request a waiver from the Commission to continue to produce Class I-T RECs until the facility can meet the requirements of Puc 2506.04.

Please contact me if you seek any additional guidance regarding these requests. Please refer to docket numbers **DE 14-296** 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

Please also send an electronic copy via e-mail to executive.director@puc.nh.gov, and copy me at 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 continuing to work with you to complete review of this docket.

Sincerely,



Barbara Bernstein
Sustainable Energy Analyst

cc: David Kyle, Yeaton Associates
Stephen McMann, Androscoggin Valley Hospital

Cleveland, Lisa

From: Cleveland, Lisa
Sent: Thursday, April 23, 2015 12:53 PM
To: 'stephen.mcmann@avhnh.org'; 'jwebb@apx.com'; Bernstein, Barbara; PUC - Executive.Director; Shulock, David; Stachow, Leszek; Frantz, Tom; Noonan, Amanda; 'dkyle@yeatonassociates.com'
Subject: DE 14-296 Androscoggin Valley Hospital, Application for Cert as Class I Thermal REC - Request for Additional Info - Staff Letter
Attachments: DE 14-296 Androscoggin Val Hos req for add info 4-22-15.pdf

Attached please find a staff letter for the above referenced docket that was filed with the Commission today, April 23, 2015. Thanks!

Lisa M. Cleveland
Program Assistant II
Public Utilities Commission
Telecommunications Division
21 S. Fruit St., Ste. 10
Concord, NH 03301
603-271-7031