

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

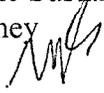
DATE: May 12, 2015

AT (OFFICE): NHPUC 12 MAY 15 10:58

FROM: Barbara Bernstein   
Sustainable Energy Analyst

SUBJECT: DE 14-296 Androscoggin Valley Hospital  
Request for a Waiver to Continue to Produce Thermal RECs While Meters  
are Installed

TO: Chairman Martin P. Honigberg  
Commissioner Robert R. Scott  
Debra A. Howland, Executive Director and Secretary

CC: Karen Cramton, Director of the Sustainable Energy Division  
Michael Sheehan, Staff Attorney 

### *Summary*

On May 8, 2015, the Commission received a request from Yeaton Associates, Inc., (Yeaton Associates) of behalf of Androscoggin Valley Hospital for a waiver to continue to qualify for interim thermal Renewable Energy Certificate (REC) eligibility until new equipment can be installed to meter the facility's 2.4527 megawatt equivalent biomass boilers. Staff recommends that the Commission grant a waiver for the Androscoggin Valley Hospital thermal biomass facility to continue to generate RECs as a Class I Thermal renewable energy source for a period of no longer than four months from the date of the secretarial letter, conditioned upon completion of the following:

- Installation of the meters necessary to meet the requirements of Puc 2506.04; and,
- Submittal of an application for final approval under Puc 2506.04.

### *Analysis - Waiver of Puc 2505.02(e)*

On December 5, 2014, the Commission approved Androscoggin Valley Hospital as an interim Class I Thermal facility effective March 21, 2014, the day the facility began operation, under the requirements of RSA 362-F:4, I(e), and New Hampshire Code of Administrative Rules Puc 2500. The interim approval was based on a process to calculate useful thermal energy without meters because the metering rules were not final. Under the provisions of Puc 2505.02(g), thermal sources requesting permanent REC eligibility have 90 days from the date the rule was adopted<sup>1</sup> to submit an application for final REC certification, which application must comply with the final metering rules.

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<sup>1</sup> Puc 2500 was adopted December 5, 2015.

Androscoggin Valley Hospital submitted an application for final approval on March 10, 2015 requesting approval under Puc 2505.06 Request for Alternative Method for Measuring Thermal Energy. The alternative method described would have not utilized the meters required in Puc, 2506.04, but would instead continue with the methods allowed in the interim rule. Staff reviewed the application and requested explanations and clarifications on the following issues:

- Why the decision was made to not follow the provisions of Puc 2506.04;
- How negating the installation of meters would meet the requirements of Puc 2506.04;
- How the proposed alternative plan to do a daily manual recording would be as accurate as the hourly reporting required in Puc 2506.04; and,
- How the proposed alternative method is equivalent to the requirements of Puc 2506.04.

Representatives from Yeaton Associates responded to Staff's request for explanation and clarification with a letter to the Commission received May 8, 2015, requesting a Waiver for Androscoggin Valley Hospital to continue to generate thermal RECs under the interim rule while they install the meters necessary to meet the requirements of Puc 2506.04.

The Androscoggin Valley Hospital thermal biomass project is registered as account number 15628 in the NEPOOL-GIS system. The NEPOOL-GIS unit identification code for the Androscoggin Valley Hospital useful thermal capacity has been verified as NON 43842. The New Hampshire Renewable Portfolio Standard certification code for the Androscoggin Valley Hospital thermal biomass project is NH-IT-14-144.

### ***Recommendation***

Staff recommends the Commission grant a waiver for the Androscoggin Valley Hospital thermal biomass facility to continue to generate RECs as a Class I Thermal renewable energy source. Staff further recommends that Androscoggin Valley Hospital be allowed a period of no longer than four months from the date of the secretarial letter to complete the following:

- Installation of the meters necessary to meet the requirements of Puc 2506.04;
- Submittal of an application for final approval under Puc 2506.04.

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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Docket #: 14-296-1 Printed: May 12, 2015

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