

THE STATE OF NEW HAMPSHIRE



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PUBLIC UTILITIES COMMISSION

21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

April 6, 2018

Adam Kohler, PE
306 Hall Road
Barrington, NH 03825

Re: REC 16-546, The Holderness School Request for Approval of Alternative Compliance Method for Calculating Thermal REC Production Due to Meter Malfunction for 2017 Quarter 4 and 2018 Quarter 1 and Related Waiver of Puc 2506 Metering and Calculation Requirements

Dear Mr. Kohler:

On February 27, 2018, you filed on behalf of The Holderness School (Holderness School), a request that the Commission approve an alternative compliance method to allow the Holderness School to obtain renewable energy certificates (RECs) for useful thermal energy produced, but not accurately metered, at their thermal biomass facility during the fourth quarter (Q4) of 2017 and the first quarter (Q1) of 2018. During those time periods, the Holderness School facility meter was malfunctioning and under-reported useful thermal energy production. The Holderness School proposed to use biomass fuel inputs and assumed thermal conversion outputs, based on historical facility performance, to determine Class I Thermal REC (T-REC) production during those two quarters.

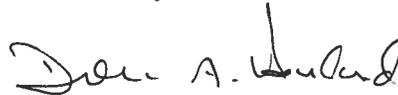
On April 3, 2018, Commission Staff (Staff) filed a memorandum summarizing its analysis of Holderness School's request to use the alternative compliance method for determining T-REC production for those time periods. Staff interpreted the request as effectively a request for a waiver of the otherwise applicable metering and calculation requirements set forth in Puc 2506. Staff concluded that the Holderness School request to use the proposed alternative compliance method of calculating T-REC production on a one-time basis for limited time periods is reasonable under the circumstances, and a rules waiver is the appropriate means of facilitating use of that alternative compliance method. Staff recommended that the Commission approve Holderness School's proposal to use the alternative compliance method by granting a one-time limited waiver under Puc 201.05 of the otherwise applicable metering and calculation requirements of Puc 2506 to permit the alternative calculation of T-RECs for Q4 2017 and Q1 2018.

The Commission has reviewed the Holderness School request and Staff's recommendation and has determined that a rule waiver may be granted in this instance under Puc 201.05 because the one-time limited waiver proposed would not disrupt the orderly and efficient resolution of matters

before the Commission and would serve the public interest inasmuch as compliance with the rules would be onerous given the circumstances of the affected person and the purpose of the rules would be satisfied by the alternative method proposed.

Accordingly, the Commission has granted the Holderness School facility a one-time limited waiver of the otherwise applicable metering and calculation requirements set forth in Puc 2506 to calculate T-REC eligibility for Q4 2017 and Q1 2018 using the proposed alternative compliance method.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra A. Howland". The signature is fluid and cursive, with the first name being the most prominent.

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.

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Docket #: 16-546-1 Printed: April 06, 2018

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.**