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PUBLIC UTILITIES COMMISSION

21 S. Fruit St., Suite 10
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April 8, 2021

Adam Kohler, PE
306 Hall Road
Barrington, NH 03825

Re: REC 21-027, The Holderness School
Class I Thermal RECs—NH Certification Code NH-IT-16-499
Granting Limited Waivers of Puc 2506.04 and Puc 2506.05

Dear Mr. Kohler:

On March 1, 2021, you filed a letter on behalf of The Holderness School (THS) requesting that the Commission approve an alternative method of measuring the thermal energy that the THS biomass heating plant produced using woodchips from September 2020 through February 2021. In that letter, you stated that you were making this request as the independent monitor for the facility, because a data logger had malfunctioned during that period. Commission Staff (Staff) filed a recommendation on March 3, 2021.

The Commission approved the THS biomass facility as eligible to produce Class I Thermal Renewable Energy Certificates (RECs) effective as of May 4, 2016. Staff stated in its recommendation that the facility uses the standard methodology described in New Hampshire Administrative Rules Puc 2506.04 and Puc 2506.05, in which a flow meter, temperature sensors, and computer are used to measure the amount of useful thermal energy produced. The measurements are transmitted to a data logger, from which the data is retrieved and used to calculate the number of RECs generated.

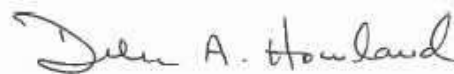
On behalf of THS, you have proposed using historical fuel delivery data and metering data from the previous 10 quarters for which data is available to determine the average number of RECs generated per ton of woodchips delivered. The average number of RECs, calculated to be 1.9 RECs per ton of green woodchips, was tested by comparing it to the theoretical value based on the heat content of the fuel. To prevent over counting, you have proposed applying a 20 percent reduction factor, resulting in a proposed rate of 1.52 RECs per ton of woodchips. Lastly, you compared the numbers of RECs that you calculated, based on the records of fuel delivered during the period in which the data logger was not recording, to the actual number of RECs reported over the past two years. You represented that the number of RECs calculated using the alternative method closely approximates the actual number

of RECs that would have been generated during the relevant time period. Further, you stated that a new data logging system was expected to be in operation by March 1, 2021.

Staff interpreted your letter as a request for a waiver of the applicable metering and calculation requirements contained in Puc 2506.04 and Puc 2506.05. In its recommendation, Staff concluded that use of the proposed alternative metering and REC calculation method for the specified limited time period was reasonable under the circumstances. According to Staff, a waiver of Puc 2506.04 and Puc 2506.05 would serve the public interest by ensuring a reasonably accurate calculation of the useful thermal energy and number of Class I Thermal RECs produced during the relevant time period, consistent with the purpose of the rules. A waiver would also serve the public interest by increasing the availability of Class I Thermal RECs. Staff recommended that the Commission grant a one-time limited waiver of Puc 2506.04 and Puc 2506.05, pursuant to its authority under Puc 201.05.

The Commission has reviewed the THS request and, based on Staff's recommendation, determined that the standards for waiver contained in Puc 201.05 have been satisfied. Accordingly, the Commission has granted the THS biomass facility a waiver of the requirements of Puc 2506.04 and Puc 2506.05, permitting THS to implement the proposed alternative metering and REC calculation method for the period of September 1, 2020 through February 28, 2021.

Sincerely,



Debra A. Howland
Executive Director

cc: Service List (Electronically)
Docket File

Service List - Docket Related

Docket#: 21-027

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