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May 19, 2021

Michael O'Leary, Asset Manager
Bridgewater Power Company LP
P.O. Box 678
Ashland, NH 03217-0678

Re: REC 21-095, Bridgewater Power Company LP
N.H. Class III Certification DE 14-209, NEPOOL GIS Code MSS357
Granting Waiver of Puc 2503.03(d)

Dear Mr. O'Leary:

On May 6, 2021, you filed a letter on behalf of Bridgewater Power Company LP (Bridgewater), with attachments, requesting a waiver of New Hampshire Code of Administrative Rules, Puc 2503.03(d), which would permit Bridgewater to count 7,563 megawatt-hours (MWh) of previously uncertified energy generation from its biomass electric generation facility in Bridgewater, New Hampshire toward the 2020 New Hampshire Renewable Portfolio Standard (RPS) Class III compliance obligation. Commission Staff (Staff) filed a recommendation on May 11, 2021.

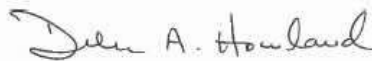
You stated in your letter that Bridgewater generated 7,563 MWh in December 2020 during the fourth quarter of 2020 (Q4 2020), but the New England Power Pool Generation Information System (GIS) administrator asserted that Bridgewater's emissions data was not posted during Q4 2020, so that the 7,563 Class III renewable energy certificates (RECs) produced were not certified as eligible by GIS. Attached to your letter are letters from the New Hampshire Department of Environmental Services and the Commission stating that Bridgewater met the required emissions standards for Q4 2020 and was certified as a REC-eligible biomass power plant during Q4 2020. Also attached are reports from GIS showing that the 7,563 Class III RECs from Bridgewater were transferrable during Q4 2020, but not certified to be eligible.

You noted that NextEra Energy Marketing, LLC (NextEra) may be willing to accept these RECs for use toward its 2020 RPS compliance obligation. On behalf of Bridgewater, you requested that the Commission waive Puc 2503.03(d), so that the 7,563 MWh generated in Q4 2020 may be counted toward the RPS Class III obligation for the 2020 compliance year without requiring submission by the purchasing electricity provider of a "My Settled Certificates Disposition" report that includes such RECs.

Staff recommended that the Commission grant Bridgewater's waiver request, stating that, but for what appears to be a technical error, the 7,563 MWh generated meets all qualifications for Class III REC eligibility. Staff noted that allowing Bridgewater to sell the 7,563 MWh of renewable generation attributes could reduce potential alternative compliance payments, the cost of which may be passed on to electricity customers. According to Staff, a waiver of Puc 2503.03(d) would enable Bridgewater to satisfy the purpose of the rule through an alternative method by counting the 7,563 MWh of Bridgewater's generation attributes, which would otherwise go unused, toward the 2020 RPS Class III compliance obligation. Further, Staff recommended that, at the time of its RPS compliance submission, NextEra or any other purchaser of those generation attributes verify that they were purchased from Bridgewater and used solely to meet RPS obligations in New Hampshire by certifying, and providing documentation showing, that the generation attributes were not used to comply with the RPS obligations of any other jurisdiction.

The Commission has reviewed your filing and, based on Staff's recommendation, determined that the standards for waiver contained in Puc 201.05 have been satisfied. Accordingly, it has granted the Bridgewater biomass electric generation facility a waiver of the requirements of Puc 2503.03(d), so that Bridgewater may sell attributes associated with the 7,563 MWh generated in Q4 2020 to NextEra or another obligated provider of electricity for use toward its 2020 compliance year RPS Class III obligation, prior to the July 1, 2021 deadline. *See* N.H. Admin. R., Puc 2503.03(a). NextEra or any other purchaser of those generation attributes shall certify and provide documentation showing that they were used to meet New Hampshire RPS obligations only and not those of any other jurisdiction.

Sincerely,



Debra A. Howland
Executive Director

cc: Service List (Electronically)
Docket File

Service List - Docket Related

Docket#: 21-095

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