

Stakeholder Meeting  
Puc 2500 Electric Renewable Portfolio Standard  
SB218  
January 25, 2013

### **Summary of Proposed Changes and Rulemaking Process**

After a brief welcome by Jack Ruderman and introductions, Liz Nixon provided an overview of the proposed changes to Puc 2500, Electric Renewable Portfolio Standard. Suzanne Amidon explained the rulemaking process and noted that the earliest that the rules could be finalized is October.

### **Stakeholder Comments and Discussion**

The PUC encouraged input especially relating to the metering and verification of thermal renewable energy certificates. The stakeholder discussion focused on the thermal portion of the proposed changes to Puc 2500. The comments and discussion of the stakeholders included the following:

- One stakeholder wanted the inclusion of air source heat pumps.
- For PM limits, one stakeholder questioned whether it was for filterable or condensable PM. DES will follow-up on this question.
- Stakeholders asked for flexibility in the licensing and skills required for the independent monitor.
- Stakeholders suggested that indirect approaches to metering could be more accurate than direct approaches.
- A participant asked if DES had considered what the best management practices are for biomass sources less than 100 MMBtu/hr? DES referred to the Biomass Energy Resource Center's (BERC's) report, [\*Emission Controls for Small Wood-Fired Boilers\*](#).
- A stakeholder encouraged that the metering balance economics with accuracy.
- A stakeholder noted that for net useful thermal energy calculation, some heat pumps may be gas-fired instead of electric, so the equation should subtract all energy usage from nonrenewable sources, not just electricity.
- A few stakeholders noted that thermal metering technology has been around for a long time but the biggest issue is the range in operating modes with low temperature changes and high temperature changes, which could result in six cascading meters for various temperature ranges.
- Stakeholders suggested different methodologies for different technologies and size. For example, for geothermal the monitoring methodology could be split into residential and commercial.
- Another stakeholder suggested basing the methodology on the fuel input and a default efficiency rating.
- Stakeholders' interpretations on eligible sources differed. Some thought that only sources serving new load should be eligible, and others thought the renewable energy source must begin operation after January 1, 2013 and can serve an existing load. The PUC believes that

eligible sources are those that began operation after January 1, 2013, whether they are serving existing or new load.

- Several stakeholders asked that strips of RECs be issued to allow for financial stability, similar to what Massachusetts has proposed. The utilities noted that Massachusetts' state government buys some of the RECs, while NH's does not. Also, in NH, electric distribution utilities can enter into bilateral agreements to purchase the RECs over a period of time which would serve the same purpose as issuing strips of RECs.
- One stakeholder suggested that each applicant could propose a methodology for metering, calculating and verifying RECs.
- NHEC commented that Puc 2506.02(f) regarding certification of meter operation needs to change because NHEC owns the meters.
- Some suggested not using specific meters especially for the smaller systems, but instead stating a monitoring methodology and/or using parametric monitoring.
- One stakeholder mentioned using ASHRAE standard 155 and EN 303 for efficiency for small industrial boiler efficiency.
- Several of the electric distribution utilities said that it will be difficult to find thermal RECs for 2013 if sources cannot apply until the rules are finalized. They said that they might as well plan to pay the alternative compliance payment estimated to total about \$0.5 million for this category in 2013.
- Some said the level of accuracy of the meters could be 3%.

The PUC requested written comments by Friday, February 8, 2013.