



 *The Intersection of Environment,
Energy and Finance.*

June 9, 2011



Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301-2429

Re: Reinstatement of Q3 2010 RECs for Connecticut Municipal Electrical Energy Cooperative

Mrs. Howland,

As discussed with Maureen Reno, our client, Connecticut Municipal Electrical Energy Cooperative (CMEEC), recently entered into a power purchase agreement for the term purchase of bundled green energy with Ridgewood Renewable Energy from their Johnston Landfill Energy facilities in Rhode Island. The deliveries under this power purchase agreement commenced in the third quarter of 2010. As such, CMEEC is a new participant in the NEPOOL GIS for REC transfers.

As CMEEC went to bank the Q3 2010 RECs in their account, due to their unfamiliarity with the GIS, they mistakenly retired them in a CT retirement account. These RECs are eligible as CT Class 1 as well as NH Class 3. Only in the last week, as they prepared to transfer these and their Q4 RECs to multiple counterparties, including New Hampshire Electric Cooperative, to meet the June 15, 2011 delivery deadline, they became aware that the 12,083 RECs from Quarter 3 2010 generation were no longer available to be transferred. These RECs originated from a combination of the RRIIG Expansion Phase II (Unit ID MSS10959) and Johnston Landfill (Unit ID MSS451) generating units (please reference the attached spreadsheet which details these specific RECs). CMEEC does not have an RPS compliance requirement in CT or any other state and did not intend to retire these RECs and in fact intended to sell these RECs as NH Class 3 RECs to entities needing them for NH RPS compliance.

Yesterday, the NEPOOL GIS Administrator wrote us an email stating that they would be able to reinstate the RECs, pursuant to Operating Rule 3.8(d), which addresses REC banking neglect. Furthermore, they are looking to specifically address this type of issue in their operating rules in the near future. The email describing the reinstatement is also attached to this letter.

Cathie Bussolotta of the Connecticut Department of Public Utility Control has been in contact with the GIS Administrator today and has provided the GIS with authorization to reinstate these specific 12,083 RECs which are not being used for compliance by a CT entity.

We are requesting that the NHPUC similarly inform the GIS Administrator that these RECs are eligible to be recognized and submitted for 2010 NH Class 3 RPS compliance so that they can be reinstated in the GIS and made available for immediate transfer. Please let me know if there is any additional information that I can provide to facilitate your review of this matter. Given the June 15, 2011 deadline to transfer these RECs in the GIS, this is certainly a time sensitive matter.



EVOLUTION
MARKETS

Evolution Markets and CMEEC thank you in advance for your consideration in this matter.

Sincerely,

Peter Zaborowsky
Managing Director
(914) 323 0257

