

**STATE OF NEW HAMPSHIRE**

## Intra-Department Communication

DATE: February 26, 2015  
 AT (OFFICE): NHPUC

**FROM:** Barbara Bernstein   
 Sustainable Energy Analyst

**SUBJECT:** Request for Recognition of Class IV Renewable Energy Certificates  
 (RECs) Generated in Quarter II, 2014

DE 12-198	Bath Electric Hydro <sup>1</sup>	DE 12-201	Salmon Brook Station 3
DE 12-181	Campton Dam	DE 12-259	River Mill Hydro
DE 12-182	Wyandotte Hydro	DE 12-237	Goodrich Falls
DE 12-200	Weston Dam		

**Staff Recommends Approval**

**TO:** Debra A. Howland, Executive Director and Secretary

**CC:** Karen Cramton, Director of the Sustainable Energy Division   
 Suzanne Amidon, Legal Division

***Analysis***

On February 13, 2015, the Commission received a letter from Stacy Havlicek, VP Electricity, North American Power, requesting that the Commission reinstate 2,250 RECs generated by the above listed Class IV Hydro facilities back into North American Power's voluntary account so that they may be retired into the appropriate NH Class IV 2014 RPS subaccount for the 2014 trading period.

Ms. Havlicek's letter states that she mistakenly retired the RECs in question to the voluntary subaccount. Ms. Havlicek is requesting the Commission's approval to move these RECs from the voluntary subaccount to the North American Power Class IV active subaccount. This will enable the RECs in question to be used for their intended RPS compliance purpose during this trading period. All of these RECs were generated in the second quarter including April, May, and June of 2014.

North American Power and the GIS database provided the information provided in the following table that provides a summary of the RECs in question. All of these Class IV RECs were generated in the second quarter of 2014.

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<sup>1</sup> The Bath Electric Company owns the Ammonoosuc River Dam Hydro project. The Commission approved this project as the Ammonoosuc River Dam Hydro project; it is listed in the GIS as Bath Electric Hydro.

Month of Generation	NH Certification #	Unit ID	Unit Name	Certificate Numbers	Quantity
2014/April	NH-IV-12-057	MSS795	River Mill Hydro	421717 - 1 to 23	23
	NH-IV-12-036	MSS910	Campton Dam	422041 - 1 to 105	105
	NH-IV-12-023	MSS824	Bath Electric Hydro	439808 - 1 to 71	71
	NH-IV-12-035	MSS903	Wyandotte Hydro	421991 - 1 to 40	40
	NH-IV-12-040	MSS913	Goodrich Falls	422014 - 1 to 121	121
	NH-IV-12-025	MSS933	Weston Dam	422046 - 1 to 263	263
	NH-IV-12-029	MSS928	Salmon Brook Station 3	422073 - 1 to 140	140
2014/May	NH-IV-12-057	MSS795	River Mill Hydro	421719 - 1 to 46	46
	NH-IV-12-023	MSS824	Bath Electric Hydro	439810 - 1 to 193	193
	NH-IV-12-035	MSS903	Wyandotte Hydro	421990 - 1 to 33	33
	NH-IV-12-036	MSS910	Campton Dam	422042 - 1 to 193	193
	NH-IV-12-025	MSS933	Weston Dam	422048 - 1 to 406	406
2014/June	NH-IV-12-057	MSS795	River Mill Hydro	421718 - 1 to 33	33
	NH-IV-12-023	MSS824	Bath Electric Hydro	439809 - 1 to 186	186
	NH-IV-12-035	MSS903	Wyandotte Hydro	421989 - 1 to 9	9
	NH-IV-12-036	MSS910	Campton Dam	422040 - 1 to 89	89
	NH-IV-12-025	MSS933	Weston Dam	422047 - 1 to 299	299
Total					2,250

***Staff Recommendation***

Staff recommends that the Commission grant North American Power’s request and issue a secretarial letter stating that the Commission will still accept them for RPS compliance when the end user retires them at the end of the year. Staff recommends the secretarial letter request the following:

- A notarized statement by the Authorized Representative of North American Power attesting that the GIS certificates listed in the statement have not otherwise been, nor will be, sold, retired, claimed, used, or represented as part of electrical energy output or sales, or used to satisfy obligations, in jurisdictions other than New Hampshire and,
- That the Supplier shall submit a copy of the notarized statement and the secretarial letter to the Commission as part of its 2014 RPS Class IV annual compliance filing.

In addition, staff recommends the Commission note that this decision regarding the 2014 Q2 certificates shall not be regarded as establishing a precedent, and the Commission may deny any similar North American Power request for a waiver in the future.

Staff finds that North American Power’s error was inadvertent, and that correcting the mistake will not adversely affect the RPS program. Further, Staff finds that it is in the best interest of the RPS that the certificates at issue be honored for 2014 RPS Class IV compliance.