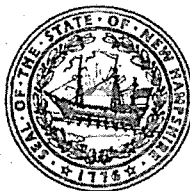


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PUBLIC UTILITIES COMMISSION

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[www.puc.nh.gov](http://www.puc.nh.gov)

April 7, 2015 NH PUC 7 APR 15 PM 1:29

Wayne G. Fillion, P.E.  
Yeaton Associates, Inc.  
66 Jackson Street  
Littleton, NH 03561

**Re: DE 14-182 Littleton Regional Healthcare, Application for Certification as a  
Class I Thermal REC Eligible Facility**

Dear Mr. Fillion:

On February 24, 2015 the Commission received an application prepared by Yeaton Associates, Inc. (Yeaton Associates) on behalf of Littleton Regional Healthcare (LRH). This application follows the interim certification granted by the Commission on October 6, 2014 for Class I Thermal renewable energy certificate (REC) eligibility for LRH's thermal biomass facility pursuant to RSA 362-F:4 and New Hampshire Code of Administrative Rules Puc 2500 finalized December 6, 2014. Staff has reviewed the LRH application and requests the following information and clarification to complete the application review.

- In the interim application, LRH stated the following: *"When the interim period expires and final rules are in place, it is our intention that LRH shall fully comply with Puc 2506.04(m)."*<sup>1</sup> Please provide a detailed explanation as to why the decision was made to not follow the provisions of Puc 2506.04 and to instead seek certification under Puc 2506.06. Staff's understanding is that the inclusion of Puc 2506.06, Request for Alternative Method for Measuring Thermal Energy, was meant to allow for innovations that weren't anticipated in the development of the rule. Please note that Puc 2506.06 (3) requests a description of the metering method otherwise required by these rules and the reasons it cannot be used with the applicant's facility.

The current application states the following:

- *The facility cannot record boiler feedwater flow data hourly because the feedwater flow meter is not read by the building energy management system. Cumulative daily flow is read manually.* Please provide a detailed explanation for

<sup>1</sup> See Page 2 of the letter from Wayne G. Fillion, P.E., dated August 19, 2014 in response to the PUC request for additional information.

not installing a meter that could meet the requirements of Puc 2506.04. Is a daily manual recording as accurate as the hourly reporting required in Puc 2506.04? Also explain how the alternative method is equivalent to the requirements of Puc 2506.04.

- *Likewise the analogue temperature and pressure are read manually. Observations reveal that temperature and pressure may vary by 2% over a given day. Reference to steam tables shows that such variation results in changes to calculated enthalpy (thermal energy) on the order of 0.1% which is very much smaller than the required accuracy of the system. (+- 5.0%). Please clarify that a different meter is not necessary.*

The Commission seeks to clarify these issues to ensure that the record supports a determination regarding LRH's eligibility as a Class I thermal source of RECs.

In addition, since Puc 2505.02(g) limits the ability to be issued RECs to the 90 day interim period after the rule's effective date, LRH should request a waiver from the Commission to continue to produce Class I-T RECs until the facility can meet the requirements of Puc 2506.04.

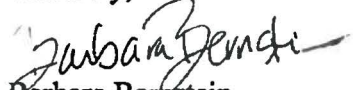
Please contact me if you seek any additional guidance regarding these requests. Please refer to docket numbers **DE 14-182** in your correspondence with the Commission.

Your response should include an original and two copies sent to the attention of the Commission's Executive Director:

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

Please also send an electronic copy via e-mail to [executive.director@puc.nh.gov](mailto:executive.director@puc.nh.gov), and copy me at [barbara.bernstein@puc.nh.gov](mailto:barbara.bernstein@puc.nh.gov). Should you have any questions, please do not hesitate to contact me. My direct line is 603-271-6011. I look forward to continuing to work with you to complete review of this docket.

Sincerely,

  
Barbara Bernstein  
Sustainable Energy Analyst

cc: David Kyle, Yeaton Associates  
Henri Wante, Littleton Regional Healthcare

## SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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tom.frantz@puc.nh.gov  
wfillion@yeatonassociates.com

Docket #: 14-182-1 Printed: April 07, 2015

### **FILING INSTRUCTIONS:**

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:  
DEBRA A HOWLAND  
EXEC DIRECTOR  
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21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.