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STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION

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February 3, 2021

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Gary Phetteplace, PE  
GWA Research, LLC  
7 Masa Morey Lane  
Lyme, NH 03768

Re: REC 19-103, North Conway Memorial Hospital  
Class I Thermal RREC #18-0492  
Granting Limited Waivers of Puc 2506.04 and Puc 2506.05

Dear Mr. Phetteplace:

On January 14, 2021, you filed a letter on behalf of the North Conway Memorial Hospital (NCMH) requesting the Commission to approve an alternative method of measuring the thermal energy that the NCMH boiler system produced using Renewable Fuel Oil (RFO) from August 1, 2020 until August 14, 2020. In this letter, you stated that, as the independent monitor of this facility, you were requesting approval of an alternative metering method, as well as the waiver of any applicable administrative rules contained in Chapter Puc 2500, because a data logger had malfunctioned during this period. Commission Staff (Staff) filed a recommendation on January 29, 2021.

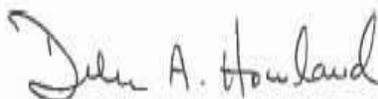
The Commission approved the NCMH biomass facility as eligible for Class I Thermal Renewable Energy Certificate (REC) production on November 27, 2019. The Commission had previously approved, by secretarial letter dated June 6, 2019, an alternative metering method for metering the useful thermal energy that the NCMH facility produced. This alternative method uses sensors and meters to measure the volume and temperature of the boiler feed water, steam pressure, and the amount of RFO in the storage tank and transmits this data to a data logger. As noted in your letter, data from the data logger is retrieved every 14 days and used to calculate useful thermal energy output.

On behalf of NCMH, you have proposed using the daily measurements of the RFO level in the holding tank to determine daily RFO consumption and then calculate the average daily Thermal RECs that would have been produced during the approximately 14-day period that the data logger was not recording. Using this method and adjusting the number of RECs based on daily average RFO use during summer, in which there is little or no space heating, you determined that RECs in the amount 119.49 MWh would have been produced from August 1, 2020 to August 14, 2020.

Staff interpreted your letter as a request for a waiver of the applicable metering and calculation requirements contained in Puc 2506.04 and Puc 2506.05. Staff concluded that use of the proposed alternative metering method for the specified limited period was reasonable under the circumstances. According to Staff, waiver of Puc 2506.04 and Puc 2506.05 would serve the public interest by ensuring a reasonably accurate calculation of the useful thermal energy and number of Class I Thermal RECs produced during the relevant time period, consistent with the purpose of the rules. It would also increase the availability of Class I Thermal RECs. Staff recommended that the Commission grant a one-time waiver of Puc 2506.04 and Puc 2506.05, pursuant to its waiver authority under Puc 201.05.

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 NCMH biomass facility a waiver of the requirements of Puc 2506.04 and Puc 2506.05 to implement the proposed alternative metering and REC calculation method for the period from August 1 to August 14, 2020.

Sincerely,

A handwritten signature in black ink that reads "Debra A. Howland". The signature is written in a cursive style with a large initial 'D'.

Debra A. Howland  
Executive Director

cc: Service List (Electronically)  
Docket File

# Service List - Docket Related

Docket#: 19-103

Printed: 2/4/2021

Email Addresses

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