

**STATE OF NEW HAMPSHIRE**

## Intra-Department Communication


DATE: June 15, 2011

AT (OFFICE): NHPUC

**FROM:** Maureen L. Reno  
Utility Analyst III

**SUBJECT:** Staff Recommendation Re: Enel Green Power North America, Inc.'s  
Request to Reinstate First Quarter 2010 New Hampshire Class IV  
RECs

**TO:** Chairman Thomas B. Getz  
Commissioner Clifton C. Below  
Commissioner Amy L. Ignatius  
Debra A. Howland, Executive Director

**CC:** Jack K. Ruderman, Director, Sustainable Energy Division   
Suzanne Amidon, Staff Attorney

On June 14, 2011, Eric Barreveld, Energy Markets Supervisor of Enel Green Power North America, Inc. (Enel), submitted a letter to the Commission, on behalf of CHI Power Marketing, Inc. (CHI), requesting that 1,067 expired renewable energy certificates (RECs) from the first quarter of 2010 be reinstated in the New England Power Pool Generation Information System (GIS) as eligible to be recognized and submitted for 2010 New Hampshire Class IV Renewable Portfolio Standard (RPS) compliance.

Due to an administrative oversight, CHI did not trade or bank the aforementioned RECs within the relevant trading period, July 15, 2010 to September 15, 2010. As a result, the RECs were automatically deleted from the GIS. These RECs are associated with output from the Salmon Falls hydropower facility in South Berwick, Maine during January, February and March 2010.

Unit ID	Unit Name	Month	Certificate Serial Numbers	RECs
MSS883	Salmon Falls Hydro	2010/1	279654 – 1 to 415	415
MSS883	Salmon Falls Hydro	2010/2	279639 – 1 to 112	112
MSS883	Salmon Falls Hydro	2010/3	279639 – 1 to 540	540

With his request, Mr. Barreveld also submitted a signed affidavit stating that the RECs will not be used for any purpose other than New Hampshire Class IV RPS compliance.

On June 13, 2010, James Webb, the GIS Administrator, notified Staff that he would be able to reinstate the above referenced RECs provided that he receive permission from the Commission, pursuant to the GIS Operating Rule 3.8 (d).

The Commission has previously granted a similar request. On May 11, 2010, Mark Driscoll, Plant Manager of Pinetree Power, Inc. (Pinetree Power), notified the Commission that he did not enter the December 2009 emissions data for the Bethlehem, New Hampshire facility before the relevant GIS REC creation deadline, April 10, 2010. As a result, the RECs that were transferred into Public Service Company of New Hampshire (PSNH)'s GIS sub-account were not classified as New Hampshire Class III RECs. In that case, the Department of Environmental Services verified that such output met the RPS emissions requirements and, subsequently, the Commission issued a letter authorizing Public Service Company of New Hampshire to use said RECs towards its 2009 Class III RPS obligation.

***Staff Recommendation***

Staff recommends that the Commission grant Mr. Barreveld's request and notify the GIS Administrator to reinstate the above referenced RECs from the first quarter of 2010 as eligible for New Hampshire Class IV RPS compliance. Since the deadline to issue this letter is the end of the fourth quarter 2010 RECs trading period, June 15, 2011, Staff recommends that the Commission issue this letter as soon as possible.