


# STATE OF NEW HAMPSHIRE

## Inter-Department Communication


**DATE:** July 26, 2012

**AT (OFFICE):** NHPUC

**FROM:** Barbara Bernstein   
Sustainable Energy Analyst

**SUBJECT:** **DE 12-207.** Ashuelot River Hydro, Inc.'s Eligibility Request for the Lower Robertson Hydroelectric Project to Produce Class IV New Hampshire Renewable Energy Certificates (RECs) Pursuant to RSA 362-F and Laws of 2012, Chapter 0272  
**Staff Recommends that Eligibility be Granted**

**TO:** Chairman Amy L. Ignatius  
Commissioner Robert R. Scott  
Commissioner Michael Harrington  
Debra A. Howland, Executive Director and Secretary

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

### *Summary*

On July 11, 2012, Ashuelot River Hydro, Inc. (Ashuelot River Hydro) submitted an application requesting Class IV certification for the Lower Robertson Hydroelectric project (Lower Robertson Hydro) pursuant to RSA 362-F, New Hampshire's Renewable Portfolio Standard law and Laws of 2012, Chapter 0272. Staff has reviewed the Ashuelot River Hydro certification request for Lower Robertson Hydro's 900 kilowatts (kW) of electrical production and has determined that it meets the eligibility requirements under RSA 362-F:4, as a Class IV hydro facility and complies with the New Hampshire Code of Administrative Rules Puc 2500. Staff has determined that the application was complete as submitted and recommends Commission approval for Lower Robertson Hydro as a Class IV renewable energy source effective July 11, 2012.

### *Analysis*

Pursuant to Laws of 2012, Chapter 0272, Class IV (Existing Small Hydroelectric) facilities of one megawatt or less may apply for RECs if they are in compliance with applicable Federal Energy Regulatory Commission (FERC) fish passage restoration requirements and interconnected with an electric distribution system located in New

Hampshire.<sup>1</sup> To qualify as a facility eligible to produce RECs, Puc 2505.02 (b) requires the source to provide the following:

- 1) *The name and address of the applicant:* The applicant is Ashuelot River Hydro, Inc., (Ashuelot River Hydro), 42 Hurricane Road, Keene, NH 03431.
- 2) *The name and location of the facility:* Lower Robertson Hydro is located on the Ashuelot River in Winchester, New Hampshire one mile from the Ashuelot River Hydroelectric facility.
- 3) *The ISO-New England asset identification number (if available).* The facility's asset identification number is 895.
- 4) *The GIS facility code if available.* The NEPOOL GIS facility code has been verified as MSS 895.
- 5) *A description of the facility including fuel type, gross nameplate generation capacity, the initial commercial operation date, and the date it began operation, if different.* Lower Robertson Hydro is a run-of-river facility that includes an 18-foot high and 125-foot long dam, an impoundment with a surface area of 8.6 acres, a powerhouse containing three turbine generators, and other appurtenances. The gross nameplate generation capacity has been verified by the GIS as 900 kW. The project began commercial operation in May 1987.
- 6) *(N/A – pertains to biomass sources).*
- 7) *All other necessary regulatory approvals, including any reviews, approvals or permits granted by the department.* A FERC Order Granting Exemption From Licensing, FERC Project Number 8235-001 was provided for Lower Robertson Hydro.
- 8) *Proof that the applicant either has an approved interconnection study on file with the commission, is a party to a currently effective interconnection agreement, or is otherwise not required to undertake an interconnection study.* Pertinent pages of the Operating Agreement for Purposes of Wheeling and Power Sales between Public Service Company of New Hampshire (PSNH) and Ashuelot River Hydro, Inc. (for the Lower Robertson Hydro project) dated December 29, 2007 were provided.
- 9) *(N/A – pertains to biomass sources).*
- 10) *A description of how the generation facility is connected to the distribution utility.* Lower Robertson Hydro is interconnected with the PSNH electric distribution system at the dam.

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<sup>1</sup> On July 19, 2012, the Commission issued Order No. 25,394 which waives the requirements of Puc 2502.10 insofar as the requirements conflict with the certification of the new category of hydroelectric facilities created by the enactment of Chapter 272.

- 11) A statement as to whether the facility has been certified under another non-federal jurisdiction's renewable portfolio standard and proof thereof.* Lower Robertson Hydro currently qualifies as a Massachusetts Class II Renewable Generation Unit.
- 12) A statement as to whether the facility's output has been verified by ISO New England.* The facility's output has been verified by ISO New England and the facility is listed in the GIS database.
- 13) A description of how the facility's output is reported to the GIS if not verified by ISO-New England.* Not applicable.
- 14) An affidavit by the owner attesting to the accuracy of the contents of the application.* An affidavit signed by Bob King, PE, President, Ashuelot River Hydro, Inc. was provided with the application.
- 15) The name and telephone number of the facility's operator, if different from the owner.* The owner and operator are one and the same.
- 16) Such other information as the applicant wishes to provide to assist in classification of the generating facility.* All information required to complete the application was provided.

### ***Recommendation***

Staff has reviewed the Lower Robertson Hydro application for Class IV certification and can affirm it is complete pursuant to New Hampshire Code of Administrative Rules Puc 2500. Staff recommends that the Commission certify Lower Robertson Hydro as a Class IV renewable energy source effective July 11, 2012.