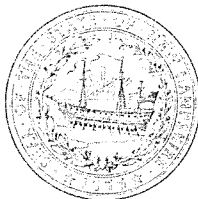


THE STATE OF NEW HAMPSHIRE

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NHPUC 7NOV13AM9:08

November 6, 2013

Eric A. DeBarba
Director – New England Origination
GDF SUEZ Energy North America, Inc.
200 Glastonbury Boulevard, Suite 303
Glastonbury, CT 06033

Re: DE 13-265, Pinetree Power – Fitchburg, Inc., Application for Certification as a
REC Eligible Facility, Letter of Deficiency

Dear Mr. DeBarba:

On September 25, 2013, the Commission received an application from GDF SUEZ Energy North America, Inc. (GDF SUEZ) requesting Class III renewable energy certificate (REC) eligibility for the 18 megawatt (MW), Pinetree Power – Fitchburg, Inc. (Pinetree Power – Fitchburg), biomass facility. According to the application, Pinetree Power – Fitchburg is located at 2 Rowtier Drive, Westminster, MA. The ISO New England asset identification number is 538 and the GIS facility code is MSS538.

Staff has reviewed your application and requests further documentation on the following:

- Under the description of the facility in number 18 of the application, GDF SUEZ states: “The Fitchburg Power Station is an 18 MW waste wood and natural gas-fired power facility located in Westminster, Massachusetts. Commercial Operation began on November 1st, 1992. The facility burns whole tree chips, derived locally from forest management and land clearing operations, making up 99% of its fuel usage. The remaining 1% derives from natural gas used for startups, flame stabilization and emission control.”

On page 3 of 23, Pinetree Power Fitchburg, Inc., Final Operating Permit, Transmittal No. 108009, DESCRIPTION OF FACILITY AND OPERATIONS it states: “The Permittee operates a multi-fuel fired (i.e., wood, natural gas, landfill gas and paper cubes) electric generator facility and associated operations.” Please provide detail on the sources of fuel, including corresponding percentages, utilized by the Pinetree Power – Fitchburg facility. Until such time that GDF SUEZ provides the

Commission with verification of the specific fuel mix utilized by Pinetree Power – Fitchburg, the application review cannot be completed.

- Please note that even with verification of the fuel utilized at the Pinetree Power – Fitchburg facility, pursuant to RSA 362-F:12 and Puc 2505.04, the Commission can only provide conditional approval of the Pinetree Power request for Class III REC eligibility until the facility meets New Hampshire Department of Environmental Services emissions testing protocol. Pursuant to RSA 362-F:12, any source seeking to qualify using an eligible biomass technology is required to verify emissions in accordance with the following methods:

I. For nitrogen oxide emissions, the source shall install and operate a continuous emissions monitor that meets departmental standards¹ as codified in rules.²

II. For particulate matter emissions, the source shall conduct an annual stack test in accordance with methods approved by the department. Upon completion of three annual tests which demonstrate compliance, the source may request the department to decrease the frequency of testing, but to not less than once every three years.

III. Each such source shall file with the department and the commission within 45 days of the end of each calendar quarter an affidavit and documentation attesting to the source's average NOx emission rate for such quarter and the most recent particulate matter stack test results. For purposes of initial certification, under RSA 362-F:6, the results of a stack test may be filed with the department at any time to demonstrate compliance with both the particulate matter and nitrogen oxide emissions standards. Within 30 days of a filing, the department shall provide verification of the emissions reported in the filing to the commission.

Please contact Joe Fontaine at DES to discuss how your facility will comply with RSA 362-F:12. His contact information follows:

Joseph.Fontaine@des.nh.gov
603-271-6794

In future correspondence with the Commission regarding Pinetree Power – Fitchburg, please refer to docket number **DE 13-265**. 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
executive.director@puc.nh.gov

¹ "Departmental" refers to the NH Department of Environmental Services (DES).

² See Puc 2500 Renewable Portfolio Standard, page 14.
<http://www.puc.nh.gov/Regulatory/Rules/Puc2500.pdf>

Please also send an electronic copy via email to executive.director@puc.nh.gov, and copy me at 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 working with you.

Sincerely,



Barbara Bernstein
Sustainable Energy Analyst

cc: Suzanne Amidon, NHPUC Staff Attorney
Jack Ruderman, Director, Sustainable Energy Division
Joe Fontaine, Air Resources Division, DES