



**HOTZERO**  
72 N. MAIN ST.  
CONCORD NH 03301  
P 603 496 2415

February 23, 2015

By Hand Delivery and Email

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

NHPUC FEB23'15 PM 2:52

RE: Docket DE 15-035: Electric Renewable Portfolio Standard: Objection to ENH Motion

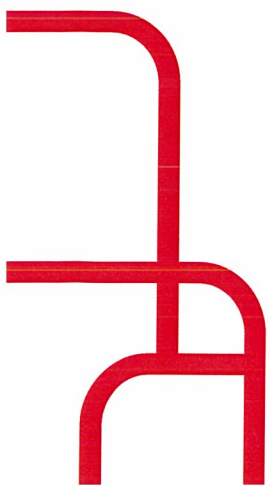
Dear Ms. Howland:

Enclosed are an original and six copies of the Objection of Hot Zero to the ENH Motion of February 11, 2015 in the above captioned matter.

Please contact me with any questions.

Sincerely,

D. Dickinson Henry, Jr.  
Founding Partner  
HotZero, LLC  
72 N. Main St. 2nd fl. Suite 5  
Concord, NH 03301  
(603) 219-0705  
dhenry@hotzero.biz



STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 15-035  
ELECTRIC RENEWABLE PORTFOLIO STANDARD  
RSA 362-F:4,V and VI, Adjustments to Renewable Class Requirements

Comments of HotZero, LLC

HotZero, LLC (HotZero) respectfully files these comments and its objection to the petition of Electricity LLC, d/b/a ENH Power in the above mentioned docket, dated February 11, 2015, in which ENH Power requested that the NH Public Utilities Commission expand this docket to include consideration of Classes I, II and IV of the NH Renewable Portfolio Standard.

Further, HotZero supports in full the comments of INRS and will not repeat them here. INRS in its comments mentions “at least a dozen more prospective thermal REC generators” and HotZero is one of those generators.

As a general matter the commission should be careful in constantly revising the requirements of the RPS. Businesses such as HotZero need consistency in policy and regulation to allow us to make the necessary long term investments in such projects.

HotZero is a for-profit energy development corporation which is developing hot water district energy systems in several communities throughout New Hampshire. These projects will generate tens of thousands of thermal renewable energy credits (TRECs) each year. The income from TRECs is a critical part of our business development plan. These projects will serve commercial, governmental, non-profit, and industrial customers. Heat generated from a centralized biomass plant will be distributed via a network of insulated underground piping throughout the downtown of each community. This centrally generated hot water will in turn provide building heat, domestic hot water, and manufacturing process heat to our customers. As each project grows, we may also serve the residential downtown buildings adjacent to our pipes. HotZero is focusing on communities which currently heat with propane, kerosene, no. 2, 4, and 6 fuel oil because they do not and will not have access to piped natural gas. By utilizing a highly

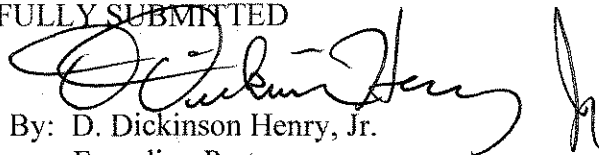
efficient centralized biomass plant, we will be displacing significant amounts of fossil fuel in keeping with the goals of RSA 362 -

**“362-F:1 Purpose.** – Renewable energy generation technologies can provide fuel diversity to the state and New England generation supply through use of local renewable fuels and resources that serve to displace and thereby lower regional dependence on fossil fuels. This has the potential to lower and stabilize future energy costs by reducing exposure to rising and volatile fossil fuel prices. The use of renewable energy technologies and fuels can also help to keep energy and investment dollars in the state to benefit our own economy. In addition, employing low emission forms of such technologies can reduce the amount of greenhouse gases, nitrogen oxides, and particulate matter emissions transported into New Hampshire and also generated in the state, thereby improving air quality and public health, and mitigating against the risks of climate change. It is therefore in the public interest to stimulate investment in low emission renewable energy generation technologies in New England and, in particular, New Hampshire, whether at new or existing facilities.”

We did not initially believe we had any reason to participate in Docket No. DE 15 – 035 as we are not involved with class III renewable portfolio requirements. However, as ENH and others have suggested expanding the docket to include all classes in the renewable class requirements, we are writing to strongly oppose any such expansion of this docket. **Should the Commission decide to expand the docket to all classes, we request permission to intervene and become a party to the expanded docket. In addition it might be advisable to re-notice the proceeding if the Commission decides to expand the scope beyond Class III.**

Wherefore HotZero respectfully requests that the Commission deny the ENH Motion as applied to Class III to expand proceeding to include REC Class I, II, and IV sources or initiate a new investigation.

RESPECTFULLY SUBMITTED



By: D. Dickinson Henry, Jr.

Founding Partner

HotZero, LLC

72 N Main St. 2<sup>nd</sup> fl. Suite 5

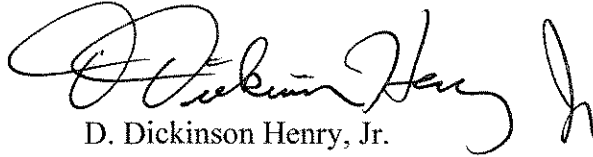
Concord, NH 03301

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CERTIFICATE OF SERVICE

I hereby certify that, on February 23, 2015, I caused a copy of the foregoing to be filed in hand and electronically with the Commission and electronically, or by US. Mail, first class to the Service List in DE 15-035.

A handwritten signature in black ink, appearing to read "D. Dickinson Henry, Jr.", with a stylized flourish at the end.

D. Dickinson Henry, Jr.