

WES Energy & Environment, LLC

902 Market Street
Meadville, PA 16335
Office: (814) 337-8223



REC15-081

July 9, 2015

NHPUC JUL15'15 AM10:22

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

Re: Warwick Mills – Waiver Request for Use of Interim Procedure and Request Regarding 2014 RECs

Dear Ms. Howland,

Per the PUC's letter dated April 30, 2015, which is attached, Warwick Mills request a waiver under the provisions in PUC 201.5 for use of the interim procedure for REC calculation through the date of conversion to the final REC calculation method.

Warwick Mills is requesting that all RECs generated in past trading periods up until the point of approval by the PUC be allowed for inclusion in an active qualification period. Per past discussions with the PUC and correspondence with the GIS administrator, this was indicated to potentially be within the discretion of the PUC to accomplish.

Thank you for your consideration of these requests, and for your support of biomass renewable energy in NH. Please feel free to contact me anytime with any questions.

Sincerely,

WES Energy and Environment, LLC

A handwritten signature in blue ink, appearing to read 'DAW', is written over a light blue horizontal line.

Daniel A. Wilson
Vice President

Attachments:

- PUC letter dated April 30, 2015

CC:

Marcel Alix, Warwick Mills
Charlie Niebling, INRS

CHAIRMAN
Martin P. Honigberg

COMMISSIONER
Robert R. Scott

EXECUTIVE DIRECTOR
Debra A. Howland

STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

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April 30, 2015

Daniel A. Wilson, P.E.
Vice President
Wilson Engineering Services, PC
902 Market Street
Meadville, PA 16335

**Re: REC 15-081 Warwick Mills, Application for Interim Certification as a
Class I Thermal REC Eligible Facility**

Dear Mr. Wilson:

On March 5, 2015, the Commission received an application prepared by Wilson Engineering Services, PC (WES) on behalf of Warwick Mills. This application requests the Commission grant Warwick Mills interim certification for Class I Thermal renewable energy certificate (REC) eligibility pursuant to RSA 362-F:4 and New Hampshire Code of Administrative Rules Puc 2500, which became effective on December 6, 2014. Staff has reviewed the Warwick Mills application and requests the following information to complete the application and clarification to assist Staff's review.

- Warwick Mills has yet to secure an independent monitor. Please note that Puc 2505.09 (a) requires an independent monitor to verify the production of useful thermal energy from an eligible source and to report such production and REC calculation to the GIS. If an independent monitor has yet to be determined, how will the facility verify production from previous quarters and comply with Puc 2505.09? The PUC cannot grant interim certification without this provision being met.
- Assuming the issue of the independent monitor is resolved, the Commission has authority to grant the request for interim certification back to January 1, 2014 pursuant to PUC 2505.02(e), but the close of the trading period for the New England Power Pool Generation Information System for 2014 RECs was April 10, 2015. Staff is checking with the GIS to see if there is any recourse.
- Puc 2505.02(g) limits the ability to be issued RECs to the period from January 1, 2014, until 90 days after the rule's effective date, which is March 5, 2015. Since March 5 has passed and Warwick Mills has not updated its application pursuant to Puc 2505.02(g) to be issued RECs after March 5, 2015, Warwick Mills cannot be

eligible to be issued RECs under the interim provisions of Puc 2505.02(e) past March 5 unless the Commission grants a waiver. Therefore, Warwick Mills should request a waiver from the Commission for authority to continue to produce Class I-T RECs until the facility can meet the requirements of Puc 2506.04 and permanent certification. *See* Puc 201.05 (Waiver of Rules).

Finally, I was glad to hear that Warwick is pursuing meters and intends to meet the provisions of Puc 2506.04. Please contact me if you seek any additional guidance regarding these requests. Please refer to docket numbers **REC 15-081** in your correspondence with the Commission.

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

Please also send an electronic copy via e-mail 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 continuing to work with you to complete review of this docket.

Sincerely,



Barbara Bernstein
Sustainable Energy Analyst

cc: Dan Wilson, WES
Marcel Alix, Warwick Mills, Inc.