



DE 19-125

NH PUC 19 JUL 19 AM 11:49

Debra A. Howland
Executive Director
State of New Hampshire Public Utility Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Request for Rule Waiver of PUC 2505.04(h)(1)

Dear Ms. Howland,

I am the Plant Manager of Springfield Power LLC, a 17.5 MW net biomass facility located in Springfield, NH. The facility has remained a Class III/IREC Generator in New Hampshire since April 7, 2010, when the facility was approved for eligibility by the commission under NH Certification Number NH-I-10-030 and NH-III-10-029I.

Under PUC 201.05, I am requesting a rule waiver of PUC 2505.04(h)(1). This rule requires that a Relative Accuracy Test Audit (RATA) be performed on the facility CEMS once every four calendar quarters, in order to maintain eligibility to produce New Hampshire Renewable Energy Certificates (RECs). In this case, the facility was removed from service early in the 2nd quarter of calendar year 2019 to minimize on-going financial losses. Late in the 2nd quarter is typically the period in which the facility would perform the RATA and annual compliance ammonia and particulate testing. Management anticipated a legislative solution that would allow the unit to be restarted and we never expected to be out of service for this length of time. The last time that the RATA and compliance testing was performed was in Q2 2018. As the facility has not been operational, it was not possible to perform the RATA during the 2nd quarter period.

I now anticipate that the facility will resume operations before the end of the year and plan to complete the RATA and compliance testing not later than 30 days following the facility's return to service date. I believe that the purpose of PUC 2505.04(h)(1) will be satisfied and that the Springfield Power facility should remain eligible to produce NH RECs for all generation during 2019.

I would like to thank you and your staff for consideration of this waiver request. I stand ready to provide additional information, relative to this request, as necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck Theall", is written over a white rectangular area.

Chuck Theall
Plant Manager