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DEPARTMENT OF ENERGY  
21 S. Fruit St., Suite 10  
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July 11, 2024

Gary Phetteplace, PhD, PE  
GWA Research LLC  
7 Masa Morey Lane  
Lyme, NH 03768

Re: RPS 2024-002, Memorial Hospital Biomass Facility – Approval of Alternative Metering Methodology Pursuant to Puc 2506.06

Dear Dr. Phetteplace:

On May 29, 2024, the Department of Energy (Department) received a request to modify an existing alternative metering method used to quantify useful thermal energy production of a Renewable Fuel Oil (RFO) boiler facility at North Conway Memorial Hospital (Memorial Hospital) under Puc 2506.06 and Puc 2506.04(e)(3). The Memorial Hospital biomass fuel facility is located at 3073 White Mountain Highway, North Conway, New Hampshire. The facility consists of two 6.695 MMBtu/hour steam boilers with a total combined capacity of 13.39 MMBtu/hour (3.924 MW equivalent). The facility first operated using Renewable Fuel Oil (RFO) as a fuel in 2014 and in 2015 for Boiler #1 and Boiler #2 respectively.

Puc 2506.04(e)(3) states as follows:

(e) Large thermal sources using a liquid or air based system shall measure the useful thermal energy produced using one of the following methods:

[...]

(3) Use of an alternative metering method approved pursuant to Puc 2506.06, provided that the accuracy of any such method is  $\pm 5.0\%$  or better, and provided that a professional engineer licensed by the state of New Hampshire and in good standing confirms that the source implemented the alternative method as approved by the commission and certifies that the alternative method achieves the stated accuracy of  $\pm 5.0\%$  or better.

Puc 2506.06 states as follows:

(a) A source shall not use an alternative metering method until that alternative method is approved by the commission.

(b) A source seeking approval of an alternative method shall provide the commission the following information:

- (1) The name, mailing address, daytime telephone number, and e-mail address of the person requesting approval for the alternative method;
- (2) The name and location of the source at which the alternative method will be implemented;
- (3) A description of the metering method otherwise required by these rules and the reasons it cannot be used with the applicant's facility;
- (4) A description of the proposed alternative method;
- (5) Technical data and information demonstrating that the accuracy of the proposed alternative method will be functionally equivalent to that achieved by the method otherwise required by these rules, such data and information may include third party data such as product test results from independent test laboratories, performance data based on nationally recognized product test/certification programs, published resource data for use in calculations, and examples of the use of the method by other organizations for similar purposes; and
- (6) A statement from a professional engineer licensed by the state of New Hampshire and in good standing of the meter accuracy rate that will be achieved by the alternative metering method and that the proposed alternative method is technologically sound.

(c) The commission shall approve an alternative metering method that satisfies the requirements of (b) above.

After reviewing the May 29 request and relevant materials and subsequent information filed on July 8, 2024, Department Staff (Staff) submitted their recommendation on July 8, 2024. As noted in the recommendation, the Flow Meters (FM) operate in a series, with FM 1 and FM 2 combined, moving 100% of the feedwater in the system. FM 3 returns make up water from the system. The proposed modification of the operating system would be FM 1 and FM 3 ( $\pm 2\% + \pm 2\%$ ), or FM 2 and FM 3 ( $\pm 2\% + \pm 2\%$ ). This would change the accuracy of the system from  $\pm 3\%$  to  $\pm 4\%$ . As noted above, Puc 2506.4(e)(3) requires an accuracy of  $\pm 5.0\%$  or better, meaning that the proposed modification to the approved metering method meets that standard.

In its recommendation, Staff concluded that the proposed modification to the approved metering method would not exceed the standard set in Puc 2506.4(e)(3), and thus recommended approval of the proposed modification to the alternative metering method for the Memorial Hospital thermal facility.

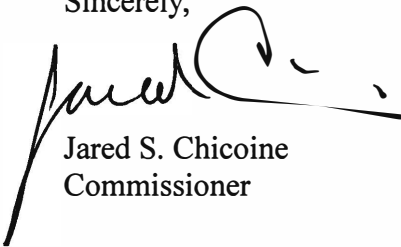
On July 1, 2021, the Department came into existence and many functions previously performed by the New Hampshire Public Utilities Commission (NHPUC) were transferred to the Department. Under RSA 12-P:14, "[e]xisting rules, orders, and approvals of the [NHPUC] which are associated with any functions, powers, and duties, transferred to the [Department] pursuant to

RSA 12-P:11 or any other statutory provision, shall continue in effect notwithstanding any provision of RSA 541-A:17, II to the contrary, and be enforced by the commissioner of the [Department] or the [NHPUC], as applicable, until they otherwise expire or are repealed or amended in accordance with applicable law, or for a period of 5 years, whichever occurs first.” See 2021 N.H. Laws Chapter 91 (House Bill 2-FN-A-Local); 2022 N.H. Laws Chapter 245 (House Bill 1258).

Under RSA 362-F, as amended effective July 1, 2021, the Department is now responsible for RPS compliance administration and REC certification, and for the adoption of related rules. The Department therefore is authorized to enforce the relevant provisions of the Puc 2500 rules, including Puc 2506.04(e)(3) and Puc 2506.06. See RSA 12-P:14.

Pursuant to that statutory authority, and based on Staff’s recommendation, I have found that the standards for approval set forth in Puc 2506.04(e)(3) and Puc 2506.06 have been satisfied. Accordingly, the Department approves the alternative metering methodology submitted by the Memorial Hospital biomass facility.

Sincerely,



Jared S. Chicoine  
Commissioner