

**THE STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

**Docket No. 2008-04**

**Application of Granite Reliable Power, LLC  
for a Certificate of Site and Facility  
for the Granite Reliable Wind Park  
Millsfield, Coos County**

**POST-HEARING BRIEF OF**

**Farrell S. Seiler, Chairman  
New Hampshire Wind Energy Association**

**9 April 2009**

**Environmental/Global Warming:**

The Noble/Granite Reliable Power (Noble/GRP) project is in the public interest for two reasons: (1) it contributes to the reliability and diversity of New Hampshire's energy supply, and (2) it contributes to the reduction of greenhouse gases and other pollutants cited by the New Hampshire Clean Power Act.

ISO-New England data indicates that the Noble/GRP project will avoid 168,000 tons of carbon dioxide, 266 tons of sulfur dioxide and 82 tons of nitrogen oxide. Unlike New Hampshire's coal-fired generation, the Noble/GRP project will emit no mercury pollution whatsoever.

**Reliability:**

Because of its modularity (33 separate operating units), the Noble/GRP project provides enhanced reliability. If one of the wind turbines is down for any reason, the plant loses only 3% of its capacity to produce electricity. Few electricity generating options, including base load, offer this robust reliability.

**Energy Production:**

The New Hampshire Wind Energy Association has evaluated the project's estimated annual electricity production. Applicant claims that the project may achieve an overall capacity factor of

35%, or 300 million kWh annually. Applicant may be under-estimating the true potential of wind electricity production at high elevation wind sites. Using publicly available wind data and proprietary analytical techniques, NHWEA estimates that the project could generate 7-10% MORE electricity annually, 320-330 million kWh, assuming an overall project availability of 97%. Greater electricity production should be expected from the five Owlhead wind turbines and the 12 wind turbines on Fishbrook.

**Financial Viability:**

During the hearings, data provided by the applicant revealed that the ability to finance and operate the project was predicated on annual electricity output. NHWEA calculates that "break even" is well below the 35% (or 300 million kWh) estimated in the project's original application. In other words, the Noble/GRP project can attract investment capital and service its debt sufficiently and in timely fashion – even with a substantial margin of error in predicting the availability, wind speed and energy content of the site's four wind turbine strings.

**Orderly Development of the Region:**

There is no need to belabor the immense contribution the GRP project will make to the future of the impacted economy of Coos County. It is duplicative to cite the guaranteed \$495,000 annual tax revenues to Coos County for 20 years. Nor is it necessary to mention the \$300,000 annual payroll from permanent, high-paying local jobs. Or should mention be made again of the hundreds of thousands of dollars paid to the landowners and leaseholders of the land. And, of course, let's not forget the millions of dollars annually which will be pumped into the long-suffering Coos County economy.

Clean energy projects are economic stimulators. And the Noble/GRP project will not leave Coos County behind in its efforts to develop its renewable energy resources further.

**Consistency with State Energy Policy:**

In early 2007, the NHWEA conducted a study, "The Potential for Wind Energy Development in New Hampshire." That study reveals that the energy content of the wind resources of New Hampshire could support approximately 1250 MW of wind electricity. Nearly half of New Hampshire's wind potential, (two-thirds of the electricity generated by Merrimack 2), could be constructed by the end of 2016.

Approximately 60%, or 740 MW, of the statewide potential of wind energy is located on medium (2000-2500 feet ASL) to high elevation (2500+ feet ASL) ridgelines in Coos County.

The 99 MW Noble/GRP project represents 14% of the developable wind energy potential in Coos County and 8% of the total potential available statewide. The annual energy output of the Noble/GRP clean power project, estimated at 300 million kWh, represents 10% of the dirty, carbon-based power generated by Merrimack Station in Bow annually.

(Testifying publicly on March 13 before the New Hampshire Senate Energy, Environment and Economic Development committee, Public Service of NH (PSNH) economist, Lisa Shapiro Esq., confirmed that the state's regulated utility estimates the Noble/GRP project could replace 10% of the electricity currently generated by the Merrimack 2 plant.)

It is important to note that the 99 MW wind project represents an important step in developing New Hampshire's renewable energy resources in a post-Merrimack, post-carbon environment. The Noble/GRP project provides an opportunity to demonstrate the scalability of wind power and the reliability of an intermittent renewable energy generation resource.

Prudent energy policy dictates that New Hampshire prepare itself for stable and continuous electricity production as the state's 40-year old coal fired generating asset is being retired.

It is also important to emphasize that the project will be a highly valuable generating asset once the Merrimack plant is phased out and New Hampshire begins to rely on wholesale power to meet its demands.

For these reasons, the New Hampshire Wind Energy Association supports Noble/GRP's application for a Certificate of Site and Facility.

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**Note:** The bylaws of the New Hampshire Wind Energy Association limit membership to residents, landowners and businesses within New Hampshire. The parent company of Granite Reliable Power, Noble Environmental Power, is a Connecticut-based, Delaware-incorporated entity and, therefore, not eligible for membership.

No member of the New Hampshire Wind Energy Association has a financial interest in Granite Reliable Power LLC, Noble Environmental Power LLC or any of its subsidiaries or expects to benefit from the issuance of a Certificate of Site and Facility.

## **PROPOSED CONDITIONS:**

### **New Hampshire Wind Energy Association**

The New Hampshire Wind Energy Associate proposes that the following conditions be included in the Certificate of Site & Facility:

#### **1. Power Purchase Agreement:**

a. The existence of a binding Power Purchase agreement (power, capacity or renewable energy credits) should not be a pre-condition for the issuance of a Certificate of Site and Facility or for the construction of the Noble/GRP project.

The Lempster precedent should be upheld.

The Power Purchase Agreement was negotiated between Iberdrola and Public Service of New Hampshire AFTER the issuance of the Certificate of Site and Facility, but BEFORE the completion of construction and interconnection with the grid.

b. Further, the issuance of a Certificate of Site and Facility should not be conditioned on the applicant agreeing that the purchaser (power, capacity or renewable energy credits) should be granted the "right of first refusal" or that purchaser should in any way compel or coerce applicant to enter into a sale arrangement in the event the project is offered for sale or transfer to another entity.

#### **2. Reporting Requirements:**

At least annually, energy production and operational data should be provided to the New Hampshire Public Utilities Commission and made available to the public to include, but not be limited to:

- (1) Project monthly and annual electricity production.
- (2) Annual project capacity factor.
- (3) Total hours of operation of each wind turbine.
- (4) Monthly and annual electricity production for each wind turbine.

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