

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Application of Antrim Wind, LLC for Certificate of site and)
facility to construct up to 30 MW of wind electric generation in)
the town of Antrim, Hillsborough County, New Hampshire and)
operate the same (SEC Docket 2012-01).)

**SUPPLEMENTAL MEMORANDUM OF THE INDUSTRIAL WIND ACTION GROUP
RESPONDING TO LATE-FILED ANTRIM WIND ENERGY, LLC DOCUMENTS**

The Industrial Wind Action Group ("IWA") respectfully submits this response to recent late-filed documents by Antrim Wind, LLC ("Applicant") relating to the Project's interconnection with the New England electricity grid system. Two documents¹, collectively known as the ISO System Impact Study ("Report"), were expected to be available to the parties prior to the official close of the public record. Specific statements contained in the Report suggest the Project will encounter operational constraints that are material. The information in the Report is contrary to testimony by the Applicant.

I. BACKGROUND

1. At the close of the proceedings on December 6, 2012, the Report relating to the Project's interconnection with the New England electricity grid system was still pending as Exhibit AWE 10. The Applicant testified before the Committee that the Report was in a draft status and not available for distribution. (*TR 10/29/12 p35 ln 4*)
2. The Report was filed with the Committee on January 16, 2013, more than 30-days after the Presiding Officer closed the public record.
3. Revision history for the late-filed documents suggest the Report was in a final form well in advance of the first hearing date of October 29, 2012. Included with the filing were partial e-mail communications with ISO-New England personnel regarding redaction of certain information subject to CEII restrictions.
4. The Applicant testified before the Committee that, according to the Report, the Project can interconnect to the grid and that no required transmission infrastructure upgrades were necessary. (*Exhibit AWE 9*)

¹ *Steady State System Impact Study Report for Q371 Wind Project Interconnecting to Line L-163 near Jackman Substation in New Hampshire* - October 9, 2012

Stability Study Report for Q371 Wind Project Interconnecting to Line L-163 Near Jackman 115 kV Substation in New Hampshire - November 30, 2012

First Sup. Kenworthy 10/11/12) (TR 10/29/12 p35 ln 9) The parties and the Committee had no access to the Report and thus no means of corroborating statements by the Applicant.

II. POTENTIAL LIMITS TO THE PROJECT'S ABILITY TO DELIVER ENERGY

5. The conclusion of the Report suggests potential material limitations to the Project's ability to deliver energy to the grid as detailed below (**emphasis added**):

(a) The operational Antrim wind facility may introduce thermal overload conditions on a portion of the L163 line. A portion of the L163 115 kV line is due to be upgraded as part of the Pittsfield-Greenfield area transmission upgrade. (*Exhibit AWE 10a Section 11.10*)

(b) If the Applicant interconnects to the grid before the Pittsfield-Greenfield upgrade is completed **the Project may be subject to real-time operational restrictions on a day-by-day basis.** (*Exhibit AWE 10a Section 11.10*)

(c) Public documents prepared by the ISO-New England confirm Project generating restrictions² until the Pittsfield-Greenfield upgrade is completed. The Pittsfield-Greenfield upgrade has not received approvals for a Proposed Plan Application (PPA) or Transmission Allocation Application (TCA)³. **The in-service date for the Pittsfield-Greenfield area upgrade is expected to be 2016; Antrim's wind facility has an expected in-service date of 2014.**

(d) If Northeast Utilities does not proceed with the necessary siting and regulatory approval to undertake the Pittsfield-Greenfield transmission upgrade, the Applicant "**will be held responsible to upgrade the section of Line L 163 from the Project's Point of Interconnection to the Keene substation.**" (*Exhibit AWE 10a Section 11.10*)

III. TRANSMISSION CONSTRAINTS MAY IMPAIR CLAIMED PROJECT BENEFITS

6. The Applicant omitted any reference to the above cited limitations in written and oral testimony. Potential real-time operational restrictions of the Project due to transmission congestion may have a material impact on the Project's forecasted average capacity factor.

7. The Avoided Emissions Analysis prepared by the Applicant ignores potential transmission constraints and thus, may overstate the environmental benefits of the Project. (*Exh. AWE 3, Appendix 10, p2*)

² ISO minutes (12/18/12) state "there will be generating restriction" on the Project until the Pittsfield/Greenfield upgrade is completed. http://www.iso-ne.com/committees/comm_wkgrps/relblty_comm/relblty/mtrls/2013/jan152013/a2_121812_rc_mtg_minutes_final.doc

³ See slide 17 at http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/mtrls/2012/oct172012/oct_project_list_slides.pdf

8. Additional Project costs associated with the transmission upgrade and/or potential Project curtailment are missing from the current record and could impact claimed economic benefits of the Project. In addition, property tax agreements with the town of Antrim that are based on the project being fully operational and available for generation may have insufficient protections relating to known transmission constraints.

IV. CONCLUSIONS

The transmission constraints identified in the Report appear material to the Project's ability to deliver energy to the grid and could potentially reduce the Project's claimed benefits. The limitations outlined in the Report were known to the Applicant in advance of the hearings beginning in October but not shared with the Committee or the parties. The conclusions of the Report cannot be ignored. We believe it would be prudent for the Committee to require the Applicant to file a memorandum explaining the limitations cited in the Report and to explain for all parties how these limitations may, or may not, impact the Project's claimed benefits. If the Applicant's response is not satisfactory to the Committee or the parties, we pray the Committee will grant fuller scrutiny of the Report. Given the lateness of the Report's filing, there was no opportunity for the parties to examine its content through the public process as required under RSA 541-A:33 IV and Site 202.26(e). We recognize that the Committee has the option to strike the late-filed Report from the record. However, we believe it is important to fully vet risks tied to the grid interconnection as soon as possible and before the Project, if certificated, is placed in-service.

Thank you for your attention to the important matter.

Dated this day of January 28, 2013

INDUSTRIAL WIND ACTION GROUP

By:



Lisa Linowes

Industrial Wind Action Group
286 Parker Hill Road
Lyman, NH 03585
(603) 838-6588

cc: Parties to Docket 2012-01