

17 March 2015

Ms. Jane Murray

Attached are my third set of suggested revisions to the draft SEC Rules of 16 December 2014, and the reasons therefore. They are for dissemination.

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Section 301.03f(3)c. and 301.03f(3)e. are marked for deletion. In view of my comments in Section 7 of my 10 March 2015 e-mail, these sections need to be kept in the Rules.

(c) is important because turbine generation serves neither "intermediate or peaking loads", a factor of no small concern in any SEC decision.

(e) The essential point of my earlier e-mail was that with the operating efficiencies of wind turbines in the 1/4 to 1/3 range, the legislative mandate of 15% AVERAGE wind energy generation translates to near 45%-60% MAXIMUM wind energy generation. Given the simultaneity of generation from turbines all over this state, and in the middle of the night, frequent surges to the ISO/NE grid reaching 45% to 60% are intolerable, and would demolish any "stability and reliability" in the grid.

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