



PO Box 383
Madison, CT 06443
Voice: 646-734-8768
Email: fpullaro@renew-ne.org
Web: renew-ne.org

March 23, 2015

David K. Wiesner
Staff Attorney
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Subject: New Hampshire Site Evaluation Committee Rulemaking, Docket No. 2014-04

Mr. Wiesner:

In response to the Site Evaluation Committee (“Committee”) notices dated January 26, 2015, and March 4, 2015, for the submission of comments in Docket 2014-10 on the initial proposals to adopt with amendments the Committee’s administrative rules, Site 100-300, pursuant to RSA 541-A:11, RENEW Northeast, Inc., (“RENEW”) submits this document to offer its views.

RENEW is a non-profit association uniting the renewable energy industry and environmental advocates whose mission involves coordinating the ideas and resources of its members with the goal of increasing environmentally sustainable energy generation in the Northeast from the region’s abundant, indigenous renewable resources.¹ RENEW has focused on highlighting the value of grid-scale resources—specifically offshore and onshore wind—and the benefits of transmission investment to deliver renewable energy to load centers in the Northeast. RENEW takes no position on any particular project; rather it urges the Committee to assure that the rules are fair and that they do not establish a *de facto* moratorium with respect to renewable energy development.

RENEW recognizes that the Committee is facing a difficult challenge in promulgating these rules. Numerous parties with various interests are deeply engaged and are providing a multitude of comments and suggestions for the Committee’s consideration. Many of the

¹ The comments expressed herein represent the views of RENEW and not necessarily those of any particular member of RENEW.

commenters are concerned about specific wind projects, and seek to use the rulemaking process to assure that they can stop those projects from being constructed. The goal of this rulemaking should be to establish fair criteria and a comprehensive process for the analysis of energy facilities. It should not be used to adjudicate whether any particular project should be built. In making decisions about these rules, RENEW respectfully asks the Committee to consider all comments in light of the letter and spirit of RSA 162-H, which is intended to promote the public interest in deploying appropriately-sited energy facilities. RENEW encourages the Committee to devote special attention to the specific comments of wind energy developers filed in this docket to ensure that the final rules provide standards for wind projects that are achievable in the real world and do not impose undue or disproportionate burdens on wind development in New Hampshire.

RENEW also agrees with stakeholders that have pointed out that the draft rules lack a meaningful standard for determining whether an energy project “serves the public interest,” which is a new requirement added to RSA 162-H by Senate Bill 245. RENEW urges the Committee to establish the following rule creating a public interest standard: “In determining whether a proposed facility serves the public interest, the committee shall consider the project’s overall public benefits. For any application of an Electric Renewable Energy resource included in RSA 362-F:4, the Committee shall consider the environmental and economic development benefits identified in RSA 362-F:1.” The benefits of renewable energy to New Hampshire’s environment, public health, consumers and economic development are clear:

- The significant emissions reductions from adding wind energy to the grid will benefit people in New Hampshire and the region by decreasing the number of deaths and the prevalence of disease caused by fossil fueled power plants and reducing the pollution that causes climate change.²
- During peak winter months, generation diversity with renewable resources helps ensure the region has sufficient gas to meet the demands of space heating and electric generation;
- Many types of renewable resources with their “free” fuel can provide an effective long term hedge against electricity price swings caused by the volatility in natural gas and other fossil fuel markets;³

² See General Electric International, Inc., *New England Wind Integration Study*, prepared for ISO New England, 261 (2010), http://www.iso-ne.com/committees/comm_wkgrps/prtcpnts_comm/pac/reports/2010/index.html. The NEWIS indicates 20 percent wind penetration corresponds to the following average air emission reductions: NOx, 6,000 tons per year or 26%; Sox, 6,000 tons per year or 6%; and CO₂, 13 million tons per year or 25%.

³ See Bolinger, Mark, Lawrence Berkeley National Laboratory, *Revisiting the Long-Term Hedge Value of Wind Power in an Era of Low Natural Gas Prices* LBNL-6103E (March, 2013), <http://emp.lbl.gov/publications/revisiting-long-term-hedge-value-wind-power-era-low-natural-gas-prices>

- Renewable resources are part of the solution to moderate the high energy market prices that New England and New Hampshire have paid in recent winters;⁴ and
- Scores of New Hampshire-based companies are part of the renewable energy manufacturing supply chain.⁵

RENEW appreciates the opportunity to offer these comments.

Respectfully submitted,



Francis Pullaro
Executive Director

⁴ See ISO New England *2011 Economic Study* (March 31, 2014), http://www.iso-ne.com/static-assets/documents/committees/comm_wkgrps/prtcpts_comm/pac/reports/2014/2011_eco_study_final.pdf. A 2011 ISO-NE study found that increasing wind from the current level of roughly 892 MW to 3926 MW (close to the collective 2021 New England RPS targets) would lower consumer electricity costs by **\$1 billion per year**.

⁵ See Seacoast Economics, *The New Hampshire Cleantech Market Report* (February 2015), <http://www.nhsea.org/sites/default/files/NHCleantechMarketRep%20FINAL.pdf>