

Dear Director Hatfield,

Thank you for the opportunity to provide public input into the SB-191 process. The four topics below are the ones I'd like to provide input on. After having spent, literally, hundreds of hours self-educating on these topics, I hope you will consider them as fully as I have researched them:

I. Grid Safety & Reliability

II. Economic & Logistical Considerations by Generation Source

III. Navigant Model

IV. Considerations Unique to NH

I. Grid Safety & Reliability

*Non-dispatchable generation capacity should correlate with load/demand seasonally and by time of day.

*Payments in the capacity market should be linked to performance in scarcity conditions.

*Any non-dispatchable source that "displaces" a dispatchable base load generation source should do so with no negative grid or pricing impact.

*"Generation resources should not be paid for simply existing." ISO-NE-
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*Renewable generation must demonstrate capacity performance during scarcity conditions and during peak load periods.

II. Economic & Logistical Considerations by Generation Source

*Generation resources can be/should be close to load centers for efficient delivery and to minimize transmission costs.

* Any non-dispatchable source that "displaces" a dispatchable generation source should do so with no negative pricing impact on the base load generation source it "displaces."

*The cost of spinning reserves should be factored into the cost for any non-dispatchable { intermittent } source.

* Any intermittent source that contributes to over capacity/negative pricing by providing a surplus of power when power is least needed, should cover the cost for negative pricing.

*As ISO-NE told FERC in writing: "The current Forward Capacity Market is contrary to sound market design."

NH residents should not continue to pay for the inefficiencies inherent in rewarding non dispatchable generation sources that do not and can not correlate with load/demand.

III. Navigant Model

*Of course electrons are electrons once they are on the grid and a mix of different generation sources will, at any given point in time, contribute to that electron mix in varying percentages, so a "blended" model is of some very broad use.

*However, each distinct generation source should be evaluated individually to include the following metrics:

- Basic PPA cost{s}
- Transmission costs unique to a particular source/ or plant
- Spinning Reserve cost{s} for non-dispatchable sources
- Generation source ability to correlate with load.
- Likelihood of negative pricing issues with a particular source
- Cost to reduce a metric ton of carbon relative to other options
- Ability to replace not "displace" coal.
- Total cost{s} associated with a generation source

*Please provide NH residents with as much metric driven granularity as possible by each generation source to include: dispatchable/non-dispatchable and renewable/ non-renewable.

IV. Considerations Unique to NH

*Please continue to consider:

- Our tourism based economy

- The health and safety of our residents

- Our status as a net exporter of electricity

- The apparent willful decision by other states to ask us to site energy facilities they could easily site. { MA has 79% of the identified sites for wind in NE but wants NH to "host" their wind plants. }

- That the best way to cut carbon is to use less power. Energy efficiency trumps production of energy capacity that does not correlate with load every time.

- That effective renewable generation is becoming more localized and that industrial scale renewables that don't correlate with load are both economically and environmentally ineffective and inefficient.

Thank you, Director Hatfield for the valuable work OEP and Navigant are doing and for the opportunity for the public to provide input.

Sincerely,

Larry Goodman
Hebron, NH