

THE STATE OF NEW HAMPSHIRE
BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION
JOINT TESTIMONY OF
ROBERT A. BAUMANN and WILLIAM H. SMAGULA
2012 DEFAULT ENERGY SERVICE RATE CHANGE - UPDATE
MERRIMACK SCRUBBER
Docket No. DE 11-215

1 **Q. Please state your names, business addresses and positions.**

2 A. My name is Robert A. Baumann. I am Director, Revenue Regulation & Load Resources
3 for Northeast Utilities Service Company (NUSCO). NUSCO provides centralized
4 services to the Northeast Utilities (NU) operating subsidiaries, including Public Service
5 Company of New Hampshire (PSNH). My business address is 107 Selden Street,
6 Berlin, Connecticut.

7 A. My name is William H. Smagula. I am Director of Generation for PSNH. My business
8 address is 780 North Commercial Street, P.O. Box 330, Manchester, New Hampshire.

9 **Q. Have you previously testified before the Commission?**

10 A. Yes. We have testified on numerous occasions before the Commission.

11 **Q. What is the purpose of your testimony?**

12 A. The purpose of our testimony is to provide an update to PSNH's September 23, 2011
13 Energy Service (ES) rate filing to reflect the addition of costs associated with the
14 Merrimack Scrubber Project. Effective September 28, 2011, that project was declared in
15 service. As of that date, the project became used and useful in the provision of service

1 to customers as it began providing significant reductions to the emissions at Merrimack
2 station. Our testimony provides the latest cost and rate estimates associated with the
3 Project as well as an historic overview of the Project's achievements and ultimate
4 declaration of in service.

5 **Q. Is it PSNH's intent to include the costs associated with the Scrubber in the ES rate**
6 **effective January 1, 2012?**

7 A Yes. Per RSA 125-O:18 PSNH shall be allowed to recover all prudent costs of
8 complying with the requirements of the Scrubber law. As part of this ES rate filing
9 calculation, we have included a forecast of Scrubber costs beginning September 28,
10 2011 through the end of 2012.

11 **Q. What is the preliminary all-in ES rate with Scrubber costs that PSNH is providing**
12 **in this filing?**

13 A. The preliminary all-in ES rate is 9.57 cents per kWh which is the composite rate made
14 up of the initial ES rate filed on September 23, 2011 (8.39 cents) plus the incorporation
15 of the initial preliminary Scrubber impact. Within this rate is a proposed three year
16 amortization of the 2011 Scrubber related under recovery which mitigates the initial rate
17 impact. The supporting calculations for this initial Scrubber impact are contained in
18 Exhibits RAB-5 and RAB-6, attached to this testimony.

19 **Q. Is PSNH proposing a specific ES rate at this time?**

20 A. No, we are not. In prior ES proceedings, the Commission has required PSNH to utilize
21 market information that is most current as of the hearing date. In light of that precedent,
22 at this time PSNH is supplying preliminary market data and operational data for its

1 owned generation consistent with our September 23, 2011 filing, as well as for existing
2 power purchase obligations (such as IPPs). PSNH will formally propose an ES rate, and
3 provide a rate calculation based on updated market information and the latest Scrubber
4 information, prior to the anticipated hearing in December 2011.

5 **Q. Will the updated filing use the same calculation methodologies as in previous**
6 **proceedings?**

7 A. Yes.

8 **Q. Please elaborate on the Scrubber project that has been included in this update.**

9 A. The "Clean Air Project", is a legislatively mandated project per 2006 N.H. Laws, Chapter
10 105, "An Act Relative to the Reduction of Mercury Emissions," which requires the
11 installation of wet flue gas desulphurization ("FGD") technology ("Scrubber" technology)
12 at Merrimack Station. This pollution control equipment significantly reduces mercury and
13 sulfur dioxide emissions. As previously noted, the law provides for the recovery by
14 PSNH of all prudent costs of the Scrubber Project via the ES rate.

15

16 The primary costs associated with the Scrubber project that are included in this rate filing
17 are (i) the depreciation costs, which are the recovery of our capital investment
18 expenditures associated with the project, (ii) a return on the capital investment or
19 ratebase, and (iii) additional operating costs associated with the Scrubber. The values
20 contained in this filing are the best available data at this time and we will update these
21 values in our November ES update as additional actual data becomes available.

1 Q. Is this filing calling for a final detailed review of the Scrubber costs?

2 A. No. Consistent with all forecasted ES costs used in the forward rate setting process,
3 review of these costs would be performed in future ES actual cost reconciliation dockets
4 for 2011 and 2012.

5 Q. Please provide an update on the Scrubber Project start-up efforts.

6 A. Outages to tie-in each of Merrimack Station's two units were planned for Fall 2011 with
7 Merrimack 1 scheduled in the month of September and Merrimack 2 scheduled for mid
8 October to mid November.

9

10 The Merrimack 1 outage was a planned 24 day tie-in outage that began on September
11 6. Ductwork changes, control system integration, and many other tasks associated with
12 the Scrubber tie-in were executed during the outage, along with other corrective and
13 preventative maintenance tasks on the unit. Start-up activities began on the weekend of
14 September 24 -25 with a phase of the unit to the grid and return to service on Sunday
15 afternoon, September 25.

16

17 The start-up activities were initiated upon removal of all safety tags and initial fires were
18 started in the boiler at 1:00 AM on Sunday, September 25. The Merrimack boilers'
19 cyclone fired design, which are significantly different than other more traditional
20 pulverized coal boilers, require more operational start-up involvement with operators and
21 have a number of inherent start-up activities. These start-up activities proceeded
22 extremely well after an almost three week shutdown including the necessary lengthy
23 routine turbine heat soak, culminating in the Unit being phased online at 3:18 PM on

1 Sunday, September 25, 2011. This tie-in outage was very successful, with unit start-up
2 occurring 5 days ahead of the outage window end date.

3
4 In parallel with these unit start-up activities, Scrubber operational preparedness was
5 performed for over 24 hours such that when the unit went online, the Scrubber was in
6 operation performing its desired functions of spraying limestone water into the absorber
7 vessel with appropriate support systems and equipment in operating mode resulting in
8 mercury and sulfur dioxide emission reductions. The unit achieved full load operation by
9 10:30 PM Sunday night and remained online many days demonstrating the reliable
10 functionality of both the unit and the Scrubber. This was an exceptionally smooth start-
11 up for the unit and a similarly exceptionally smooth start-up for the first time operation of
12 the Clean Air Project. The tie-in outage for Merrimack Unit 2 began October 12.

13 **Q. Please provide the basis of support for the Scrubber in-service date of September**
14 **28, 2011.**

15 A. Merrimack Station has previously constructed and put in-service pollution control
16 equipment as back-end technology such as SCRs for nitrous oxide emission reductions
17 and supplemental precipitators for particulate emission reductions on both Unit 1 and
18 Unit 2. Consistent with the treatment of other completed small or large capital projects,
19 the pollution control equipment of the Scrubber is being operated as an integral part of
20 station operations and as such typically goes into service when the equipment begins to
21 function as designed. That is when the equipment becomes used and useful in the
22 provision of service to customers. In this instance, due to the amount of new equipment
23 associated with the Scrubber, a slightly longer than normal period of operation was

1 allowed to occur before an in-service declaration was confirmed on September 28, 2011,
2 in order to confirm that the various Scrubber functions were all successfully operating
3 and the Project was fulfilling its statutory purpose of reducing mercury, and also
4 significantly reducing sulfur dioxide emissions,

5 **Q. Does this conclude your testimony?**

6 **A. Yes, it does.**