COVANTA MAINE, LLC
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June 4, 2014

Ms. Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket # 4497; Application of Covanta Jonesboro for Certification as no less than 96% and up to 97% Rhode Island New Renewable Energy Resource and between 4% and 3% Rhode Island Existing Renewable Energy Resource, respectively.

Dear Ms. Massaro:

Per your e-mail, dated May 23, 2014, please find attached a confidential version and a public redacted version of the two following documents. The confidential version is enclosed in a separate envelope.

- **Covanta Jonesboro's Biomass Fuel Source Plan 2009-2013**
- **Covanta Jonesboro's Plant Availability Improvements 2006-2013**

For purposes of responding to inquiries regarding these documents, besides the two persons mentioned in the initial cover letter, persons from the Commission should feel free to contact the following:

William P. Short III
Consultant
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Upon your review of these documents, if you have any questions on comments, please do not hesitate to contact either Bill Short, Peter Williams or myself.

Sincerely yours,

Ken Nydam

attachments

cc: Peter Williams
William P. Short III

LISTS OF ATTACHMENTS

Confidential Covanta Jonesboro's Biomass Fuel Source Plan 2009-2013[1]

Public Redacted Covanta Jonesboro's Biomass Fuel Source Plan 2009-2013

Confidential Covanta Jonesboro's Plant Availability Improvements 2006-2013

Public Redacted Covanta Jonesboro's Plant Availability Improvements 2006-2013

[1] Items in **Red and Bold** are deemed commercially sensitive information by Covanta.

PUBLIC REDACTED VERSION

COVANTA JONESBORO
BIOMASS FUEL SOURCE PLAN
2009-2013

Covanta Maine Energy, LLC operates Covanta Jonesboro, a biomass power plant, located in the eastern Maine town of Jonesboro, Washington County. [redacted] wood fuel suppliers supply Covanta Jonesboro. Some of these suppliers overlap with suppliers to the Covanta West Enfield facility. The biomass is procured from areas in [redacted] Maine mainly [redacted] Counties. The vast majority of its biomass comes from a distance of [redacted] miles or less.

The [redacted] of Covanta Jonesboro's fuel is procured from large forest tracts, mostly former paper company lands (approximately [redacted] in any given year). The next largest quantity is procured from small woodlot owners while the third source is sawmill residuals (approximately [redacted] in any given year). The 2009-2013 procurement plan has been to procure biomass residuals in the form of tops, limbs, and thinnings from forest operations (approximately [redacted] in any given year). Mill residuals such as bark and pin chips along with grindings constitute approximately [redacted] of the balance in any given year.

Covanta Maine Energy only procures forest derived biomass and mill residues for its facilities. Its wood contracts, among other things, specify [redacted] of biomass. A copy of the Fuel Specifications has been attached to this application. Given that only forest biomass is contracted for and the location of Covanta Maine Energy's facilities far away from urban areas, no suppliers have attempted to deliver processed wood such as plywood, particle board, composite board or medium density fiberboard or construction and demolition wood.

Each load of biomass is visually inspected. If found not to meet the specifications called for, the load is not accepted and the load is turned away. The loads that are turned away are those where the supplier has attempted to deliver biomass that (1) is not the biomass contracted for, (2) contains too much dirt or rock or (3) is too large to be processed by the plant's fuel handling equipment. If the load is delivered and found out that the load did not meet the specifications of the contract, the load is not paid for, the supplier is put on probation and no additional supplies are accepted from that supplier until the probation period has expired.

Covanta Maine Energy's insistence on forest biomass is mandated by its air permit, which permits only the burning of forest biomass. Periodically, Covanta Maine Energy has Covanta Jonesboro's ash analyzed for metals and organic compounds. Those test results verified that Covanta Jonesboro has been burning only Eligible Biomass Fuels and that its ash is capable of being landspread on farmers' fields as a lime substitute and used in a proprietary blend for making animal bedding for dairy farmers. If Covanta Jonesboro had burned ineligible biomass fuels, its ash would regularly fail these tests and all of its ash would be mandated to be placed in a secure landfill. In addition, Covanta

Maine Energy would be in violation of its air permit and reports of such variances would have to be made to the Maine Department of Environmental Protection.

PUBLIC REDACTED VERSION

FUEL SPECIFICATIONS

Fuel. All Fuel delivered by Seller to Buyer hereunder shall be produced in accordance with and meet or exceed the following specifications (hereinafter "Specifications"):

a. Whole tree chippers must be adjusted according to factory specifications so as to produce an accepted product.

b. All Fuel shall be free of foreign material including, but not limited to, stones, metal, dirt, mud, ice, glue, paint, chemicals, diesel fuel, plastics and other such material.

c. Oversized wood chips, between [redacted] in diameter and less than [redacted] long, shall constitute [redacted] of any shipment delivered to Buyer hereunder. A minimum of [redacted] of a delivery of Fuel shall pass through a [redacted] mesh screen. If such amount does not pass through such screen, it will be deemed as containing more than [redacted] of oversized material and will be rejected.

d. Biomass moisture content shall vary depending upon specie but will not exceed [redacted].

e. All hardwood and softwood species of wood native to the State of Maine are acceptable. Cedar is not considered part of the fuel and if delivered must constitute less than [redacted] of any delivery.

f. The maximum amount of wood fines permitted in any delivery of Fuel will be [redacted]. Wood fines are defined as woody fiber, needles passing through a [redacted] mesh screen. Seller shall maintain its equipment in so as to minimize the production of Wood Fines, including but not limited to, maintaining sharp knives, and sharp anvils.

Buyer shall have the right to reject any delivery if the Fuel does not meet all of the specifications set forth above ("Non-Complying Fuel"). Rejected fuel remains the property of the seller and is the seller's responsibility to remove non-complying fuel from buyer's facility.

Sampling. Buyer (or its agent or representative) may from time to time, and at its expense, sample randomly selected Biomass Fuel delivered to the Facility using customary laboratory procedures and other means of testing (e.g., [redacted]). If the sampling discloses that any Biomass Fuel delivered by Seller does not meet the Specifications (such Fuel being Non-Complying Fuel), Buyer may ([redacted]. Buyer's acceptance of a delivery that in not in conformance with one or more of the above specifications does not [redacted]

[redacted] Should a suspension in deliveries occur hereunder, Seller shall notify Buyer [redacted]. Buyer shall take such samples [redacted]. During any period of suspension under this paragraph, Buyers may [redacted]

PUBLIC READACTED VERSION

Covanta West Enfield
Plant Availability Improvements
2006-2013

Vendor	System	Part Description	Cost	Date Received
CORROSION MONITORING	Air Heater	[redacted]		
CMS	Air Heater			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
NEMO	Boiler SH's			
Pressure Parts Inc	Boiler SH's			
Chicago Tube& Iron	Boiler SH's			
Helfrich Bros	Boiler SH's			
Fastco	Boiler SH's			
NIS Insulation	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
SEVCO	Boiler SH's			
FASTCO	L-Valves			
FASTCO	L-Valves			
ROLLED ALLOYS	L-Valves			
FW WEBB	L-Valves			
FASTCO	Multiclone			
Multi-tube	Multiclone			
MATRIX	Multiclone			
FASTCO	U-Beams			
FASTCO	U-Beams			
NORTH AMERICAN INDUS	U-Beams			
ROLLED ALLOYS	U-Beams			
GILCHRIST	U-Beams			
ALL STAINLESS	U-Beams			
ZAMPELL	U-Beams			
Fastco	T-Beams			
Fastco	T-Beams			
Fastco	T-Beams			
Metso Power	U-Beams			
Rolled Alloys	U-Beams			
Fastco	U-Beams			
Fastco	U-Beams			
Zampell	U-Beams			
Chalmers & Kubeck	U-Beams			
		Totals	$ 4,050,728.42	

PUBLIC READACTED VERSION

Covanta West Enfield
Plant Availability Improvements
2006-2013

Vendor	System	Part Description	Cost	Date Received
FASTCO	Boiler SH's	[redacted]		
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
NEMO	Boiler SH's			
Pressure Parts Inc	Boiler SH's			
Chicago Tube& Iron	Boiler SH's			
Helfrich Bros	Boiler SH's			
Fastco	Boiler SH's			
NIS Insulation	Boiler SH's			
FASTCO	Boiler SH's			
FASTCO	Boiler SH's			
SEVCO	Boiler SH's			
		Totals	$ 2,210,825.03	

PUBLIC READACTED VERSION

Covanta West Enfield
Plant Availability Improvements
2006-2013

Vendor	System	Part Description	Cost	Date Received
FASTCO	U-Beams	[redacted]		
FASTCO	U-Beams			
NORTH AMERICAN INDUS.	U-Beams			
ROLLED ALLOYS	U-Beams			
GILCHRIST	U-Beams			
ALL STAINLESS	U-Beams			
ZAMPELL	U-Beams			
Fastco	T-Beams			
Fastco	T-Beams			
Fastco	T-Beams			
Metso Power	U-Beams			
Rolled Alloys	U-Beams			
Fastco	U-Beams			
Fastco	U-Beams			
Zampell	U-Beams			
Chalmers & Kubeck	U-Beams			
		Totals	$1,352,489.82	

PUBLIC READACTED VERSION

Covanta Jonesboro
Plant Availability Improvements
2006-2013

Vendor	System	Part Description	Cost	Date Received
FASTCO	L-Valves	[redacted]		
FASTCO	L-Valves			
ROLLED ALLOYS	L-Valves			
FW WEBB	L-Valves			
		Totals	$ 76,835.05	

PUBLIC READACTED VERSION

Covanta West Enfield
Plant Availability Improvements
2006-2013

Vendor	System	Part Description	Cost	Date Received
CORROSION MONITORING	Air Heater	[redacted]		
CMS	Air Heater			
		Totals	$ 177,690.55	

PUBLIC READACTED VERSION

Covanta Jonesboro
Plant Availability Improvements
2006-2013

Vendor	System	Part Description	Cost	Date Received
FASTCO	Multiclone	[redacted]		
Multi-tube	Multiclone			
MATRIX	Multiclone			
		Totals	$ 232,887.97	