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July 22, 2016

Donna Jerry, Health Care Administrator  
Green Mountain Care Board  
89 Main Street, Third Floor, City Center,  
Montpelier, VT 05620

RE: Docket No. GMBC-017-15con  
Certificate of Need for replacement boiler plant at the Southwestern Vermont Medical Center

Dear Ms. Jerry,

Thank you for the opportunity to provide comments on the revised Certificate of Need (CON) application submitted by Southwestern Vermont Medical Center (SVMC) for the replacement of their heating plant.

The Public Service Department (PSD) reviewed the application and was not able to determine from the information submitted if the heating plant SVMC is proposing will allow the hospital to switch efficiently to a wood chip fuel source in the future. The PSD was also unable to verify the energy cost savings presented. To evaluate the SVMC application adequately the PSD needs additional information. Therefore, the PSD suggests presenting the following questions to SVMC:

- 1) Can SVMC provide any cost analysis completed on the installation of a wood chip combustor as part of the proposed construction or as a retrofit? If SVMC is planning a conversion to wood fuel, the capital cost of installing the combustor as part of the boiler plant construction will likely be more cost effective than retrofitting the boiler with a wood chip combustor in the future.
- 2) Can SVMC provide more detail on the design of the boiler plant? Are there more detailed construction documents available than was provided with the application? The current documents provided (3 pdf drawings A-200, M-100, and SITE) do not provide enough detail to verify that there is sufficient access to the plant for wood chip deliveries, or that there is sufficient room for wood fuel storage, fuel handling, an ESP for emission control, or ash handling for a potential future conversion to wood chips.
- 3) Could SVMC provide the energy cost assumptions used to develop the savings of the CNG project? The following is requested:
  - a. most recent #6 fuel oil unit cost (i.e. \$/gallon)
  - b. annual fuel oil input in MMBtu used for developing the cost listed in the application
  - c. annual natural gas input in MMBtu used for developing the cost listed in the application
  - d. natural gas unit cost used for developing the annual fuel cost listed in the application.



- 4) Could SVMC provide the most recent propane price quote used to evaluate whether propane would be a viable fuel? Please note that regional averages for residential pricing is not indicative of commercial pricing. EIA is projecting that propane will have a very low escalation rate going forward, and likely has a current delivered cost that is lower than the delivered cost per MMBtu (\$13.22) listed in the CNG contract submitted.
- 5) What is the pressure rating of the proposed Hurst boiler? If the boiler is rated at 450 psig this would allow for future use with a thermally-led combined heat and power system.

Sincerely,

A handwritten signature in black ink, appearing to read "Asa Hopkins", with a stylized flourish at the end.

Asa Hopkins,  
Director  
Planning & Energy Resource Division