

The Honorable Lisa Murkowski, Chairman
U.S. Senate Committee on Energy and Natural
Resources
304 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Maria Cantwell, Ranking Member
U.S. Senate Committee on Energy and Natural
Resources
304 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Fred Upton, Chairman
U.S. House Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr., Ranking Member
U.S. House Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Rob Bishop, Chairman
U.S. House Committee on Natural Resources
1324 Longworth House Office Building
Washington, DC 20515

The Honorable Raúl Grijalva, Ranking Member
U.S. House Committee on Natural Resources
1324 Longworth House Office Building
Washington, DC 20515

August 11, 2016

Dear Chairman Murkowski, Chairman Upton, Chairman Bishop, Ranking Member Cantwell, Ranking Member Pallone, and Ranking Member Grijalva:

The Heat is Power Association (HiP) appreciates this opportunity to provide comment as you work together to develop a bipartisan energy policy bill that can be signed into law. HiP is the U.S. trade association for the waste heat to power (WHP) industry. WHP captures heat that would otherwise be vented into the atmosphere from industrial processes and uses it to generate electricity with no additional fuel, combustion, or emissions. As such, WHP turns waste heat into a resource for clean electricity generation and an economic driver for global competitiveness. WHP can help address critical public policy objectives related to increasing industrial efficiency and reducing emissions of greenhouse gases and criteria pollutants.

We support the House and Senate energy bills under consideration that encourage the deployment of WHP resources as part of the U.S. clean energy mix. We hope you will include the following measures, also recommended in a letter to you from the Alliance for Industrial Efficiency, in the conference report:

Defining Renewables to Include WHP: The Energy Policy Act of 2005 requires at least 7.5 percent of electric energy the federal government consumes come from renewable energy sources. Section 3801 of the Energy Policy Modernization Act (S. 2012) and section 3115 of the House Amendment to S. 2012, amend section 203(b) of the Energy Policy Act of 2005 to include qualified waste heat resources within the definition of renewable energy that is applicable to these purchases. WHP produces electricity without creating any incremental emissions, and is included in 17 of the 29 state Renewable Portfolio Standards (RPS), and three state Energy Efficiency Resource Standards, goals or targets.

The Heat is Power Association (HiP) is the trade association for the waste heat to power (WHP) industry. WHP uses waste heat from industrial processes to generate electricity with no additional fuel, no combustion, and no incremental emissions. HiP educates decision makers about clean energy from waste heat and lobbies for policies that provide parity for WHP with other sources of emission-free power like wind, solar and geothermal.

Model Guidance for WHP and combined heat and power (CHP) Systems: The Department of Energy (DOE) has long recognized that interconnection, standby fees and tariffs, and environmental permitting are barriers to the deployment of WHP and CHP. Section 2311 of the Energy Policy Modernization Act (S. 2012) would require the DOE, in consultation with the Federal Energy Regulatory Commission, review existing rules on interconnection and additional utility services throughout the United States to identify barriers to the deployment of WHP and CHP, and create model guidance for states on reducing these barriers. This guidance would help states address a few of the key regulatory barriers preventing the deployment of WHP and CHP systems.

Recognition of WHP and CHP Resiliency & Reliability Benefits: We also support provisions that incorporate WHP and CHP into programs seeking to enhance the resilience of the nation's electric infrastructure. Section 1107 of the House Amendment to the Energy Policy Modernization Act (S. 2012) directs states and electric utilities to consider developing resiliency plans that include the use of technologies such as WHP and CHP to improve the resilience of electric infrastructure, prevent outages, and maintain critical public services.

Manufacturing Energy Efficiency: Subtitle C, the Energy Policy Modernization Act (S. 2012) expands the reach of the DOE's programs that assist the industrial sector. In particular, section 1201 adds the "Future of Industry Program" and the "Sustainable Manufacturing Initiative," which would direct coordination of DOE's manufacturing programs and direct the DOE to provide onsite technical assessments to manufacturers seeking energy efficiency opportunities. Sec. 1201 also adds wastewater treatment to the list of industrial activities to be served by the energy-intensive industries program. WHP systems, like the one at the Albany County Sewer District - North Plant, use waste gas vented from wastewater treatment processes to generate electricity they can then use on-site to power their processes or sell back to the grid.¹ According to the Clean Watersheds Needs Survey 2012 Report to Congress, there were 14,748 publicly owned wastewater treatment plants serving 238.2 million Americans, or 76 percent of the population in 2012.² WHP systems installed at these plants, as well as at privately owned treatment plants, provide a huge opportunity for the U.S. to generate clean electricity.

Please let me know if we can provide additional background information about WHP and policies to support its deployment. We look forward to working with you to bring the many benefits of WHP to the Nation's clean power generation mix.

Sincerely,



Susan Brodie, Executive Director

cc: Representatives Joe Barton, Ed Whitfield, John Shimkus, Robert Latta, Cathy McMorris Rodgers, Pete Olson, David Mckinley, Mike Pompeo, Morgan Griffith, Bill Johnson, Bill Flores, Markwayne Mullin, Don Young, Cynthia Lummis, Jeff Denham, Bruce Westerman, Lamar Smith, Randy Weber, Mike Conaway, Glenn Thompson, Cresent Hardy, Lee Zeldin, Collin Peterson, Eddie Bernice Johnson, Peter DeFazio, Bobby Rush, Lois Capps, Doris Matsui, John Sarbanes, Peter Welch, Ben Ray Luján, Paul Tonko, Jared Huffman, Debbie Dingell; Senators John Barrasso, Jim Risch, John Cornyn, Ron Wyden, Bernie Sanders

¹ <http://www.heatispower.org/wp-content/uploads/2014/03/HiP-Albany-WWTP-WHP-Project-Profile.pdf>

² https://www.epa.gov/sites/production/files/2015-12/documents/cwns_2012_report_to_congress-508-opt.pdf, page 25