

Comments on Public Utilities Commission of Ohio Case Nos.**13-651-EL-ORD****13-652-EL-ORD****12-2156-EL-ORD**

The Heat is Power Association is pleased to provide input to the PUCO regarding draft rule changes in case numbers 13-651-EL-ORD, 13-652-EL-ORD, and 12-2156-EL-ORD. These comments primarily focus on the waste energy recovery (WER) provisions. As the national association for companies and stakeholders interested in the conversion of waste heat into fuel-free and emission-free electricity, we appreciate how you have incorporated WER into Ohio's Alternative Energy Resource Standard (AERS) and Energy Efficiency Resource Standard (EERS).

Background on the Heat is Power Association and the Waste Heat to Power / Waste Energy Recovery Industry

The Heat is Power Association is the trade association for the waste heat to power (WHP) industry, called waste energy recovery in Ohio. Our members range in size from large to small manufacturers, technology developers, project developers, component suppliers, and industrial end users throughout the United States. Waste heat to power encompasses a suite of technologies and applications that can improve industrial energy efficiency and reduce emissions anywhere heat is vented or wasted. Cement, paper, steel, and oil and gas are good examples of energy intensive industries where waste heat to power applications have been successful. Two of our member companies are manufacturers based in Ohio, while others conduct business in the state.

Waste heat to power installations capture the heat generated as a by-product from industrial processes and convert that heat into electricity through a process that does not involve burning any additional fuel or emitting any additional pollution or greenhouse gases. The process to convert industrial waste heat to electricity is almost identical to the process used to convert geothermal energy to electricity.

Ohio is in good company in recognizing WER as a renewable resource; a total of fifteen states consider waste heat to power to be renewable. In addition, WHP's zero combustion and zero emissions profile earn it a place in many state energy efficiency resource standards.

The Heat is Power Association is the trade association of the Waste Heat to Power (WHP) industry. The not-for-profit organization is committed to educating decision makers and other stakeholders about the characteristics of waste heat to power as a source for emission-free electricity and an economic driver for global competitiveness. The Heat is Power Association promotes the efficient, industrial use of emission-free electricity generated through WHP processes. To learn more, visit www.heatispower.org.

Support for Waste Energy Recovery in the Proposed Rules

With regard to the proposed treatment of WER in the Alternative Energy Resource Standard, we support the proposal to treat WER as a renewable energy resource that can generate renewable energy credits (RECs). The proposal is straightforward and consistent with SB 315.

With regard to the treatment of WER in the state's mercantile self-direct program for energy efficiency, we would like to highlight two things. First, and most importantly, the entire output of a WER system should qualify as electrical savings as WER systems produce electricity using waste heat and use no incremental fossil fuel and produce no incremental emissions. Second, the proposed maximum incentive payment of \$0.005/KWh is too low to incent WER projects which have higher capital costs compared to fossil-fuel based technologies. We therefore urge serious consideration of a higher incentive in the EERS, even though WER projects would be more likely to opt for the substantially greater compensation expected to be offered from the AERS program.

We thank you for the opportunity to provide input and would be happy to provide additional detail regarding any of these points if and when there are additional opportunities to do so.

Sincerely,



Susan Brodie
Executive Director
The Heat is Power Association
Susan@heatispower.org

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/3/2014 2:02:53 PM

in

Case No(s). 13-0652-EL-ORD, 12-2156-EL-ORD, 13-0651-EL-ORD

Summary: Comments Comments of the Heat is Power Association on draft rule changes to Ohio's Alternative Energy Resource Standard (AERS) and Energy Efficiency Resource Standard (EERS). electronically filed by Ms. Susan Brodie on behalf of Heat is Power Association