

**BEFORE THE  
LOUISIANA PUBLIC SERVICES COMMISSION**

<b>LOUISIANA PUBLIC SERVICE COMMISSION</b>	)	
<b>EX PARTE</b>	)	
	)	<b>DOCKET R-28271</b>
<b>IN RE: IMPLEMENTATION PLAN OF A</b>	)	<b>SUBDOCKET B</b>
<b>RENEWABLE PORTFOLIO STANDARD FOR THE</b>	)	
<b>STATE OF LOUISIANA</b>	)	
	)	

**COMMENTS OF THE  
GULF COAST CLEAN ENERGY APPLICATION CENTER**

The Gulf Coast Clean Energy Application Center respectfully offers these comments in response to the Louisiana Public Service Commission (“LPSC” or the “Commission”) Staff’s request for position statements on September 10, 2010 on the above referenced Renewable Energy Efficiency Goal considered in Docket No. R-28271, Subdocket B.

The Gulf Coast Clean Energy Application Center (“GC RAC”) facilitates greater deployment of clean energy technologies like combined heat and power (“CHP”), district energy, and waste heat recovery in Louisiana, Texas, and Oklahoma. The GC RAC, which is hosted by the Houston Advance Research Center, a non-profit scientific organization, provides education and outreach programs, project-specific support services, and policy development initiatives supportive of clean energy.

GC RAC applauds the inclusion of combined heat and power (CHP) and waste heat recovery (WHR) under the Pilot Renewable Portfolio Standard (RPS) as recommended in Staff’s Proposed Implementation Plan. GC RAC further offers the following comments in support of Staff’s recommendations.

Waste heat recovery is a large and important resource for Louisiana. Whether the source of waste heat is from naturally occurring geothermal processes in the Earth or from manmade sources, waste heat is a valuable resource that the PSC should incentivize it within the RPS program. Waste heat recovery projects are equivalent to wind or solar power in cleanliness, but provide firm, baseload power that is generated in close proximity to where it is needed. Power production close to loads reduces the need for transmission lines to carry power from remote renewable energy resources and increases energy security for adopters. Waste heat available at prime movers used to generate electricity is no less valuable than waste heat from industrial processes or from prime movers performing in alternative applications, such as compressing natural gas along pipelines. Energy captured and used from so-called CHP facilities are rightly included in the program, although the Gulf Coast Clean Energy Application Center sees no reason to arbitrarily limit energy conservation to projects less than 30 MW in nameplate capacity and so would encourage the Commission to reconsider this limitation.

The Commission should also reconsider the benefits to the State of Louisiana of incentivizing the use of waste heat for non-electric purposes, such as offsetting boiler operations and producing chilled water, mechanical work, and dehumidification, as these uses of waste heat produce air quality and resource conservation benefits that are often equivalent to or greater than those created through the generation of electricity. Preferential treatment of electricity production for inclusion in the program could result in less optimal project configuration and operation.

The GC RAC appreciates the opportunity to file these comments.

Respectfully submitted,

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