BEFORE THE

PUBLIC UTILITY COMMISSION OF TEXAS

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EX PARTE	)	
	)	**DOCKET 35792**
IN RE: 500 MW RENWEABLE CARVE-OUT	)	
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COMMENTS OF THE
U.S. DEPT. OF ENERGY GULF COAST CLEAN ENERGY APPLICATION CENTER

The U.S. Department of Energy Gulf Coast Clean Energy Application Center respectfully offers these comments on the strawman rule produced by the Texas Public Utility Commission ("PUCT" or the "Commission") Staff on December 21, 2009 on the above referenced goal for renewable energy considered in Docket No. 35792.

The U.S. Department of Energy 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 Texas, Louisiana, 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 PUC's efforts to create a 500 megawatt non-wind renewable energy target in PURA §39.904. A number of renewable energy technologies, including solar thermal, concentrating solar photovoltaic, and biomass projects have potential to achieve greater total energy efficiency by using some available heat for non-electrical uses. The GC RAC

supports the implementation and operation of renewable energy projects in ways that achieve the greatest energy efficiency possible, and so supports the proposal that tradable renewable energy certificates ("RECs") be created by *both* electric and non-electric uses of renewable energy. This proposal would ensure that the generation of RECs does not incent operators of renewable energy projects to sacrifice overall energy efficiency.

The GC RAC appreciates the opportunity to file these comments.

Respectfully submitted,

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