

January 10, 2012

RE: Development of a U.S. Heat Meter Standard

Dear Standards Development Organization:

The Biomass Thermal Energy Council (BTEC) wishes to issue its strong support of the combined private- and public-sector stakeholder effort to develop a United States heat meter standard. In addition to defining the operational and accuracy characteristics of heat meter instrumentation, a standard would help ensure the proper attribution of the energy, financial and environmental benefits generated from thermal energy resources and technologies. Defining a national standard for measuring these benefits will ultimately lead to policies that recognize the importance of thermal energy in our nation's energy portfolio.

BTEC is the leading national non-profit association committed to advancing the use of biomass for heat and other thermal applications. According to the Energy Information Administration, approximately one-third of U.S. energy consumption is used in thermal applications, and in 2008, consumption of biomass for thermal applications totaled 2.4 quadrillion BTUs. BTEC believes that by utilizing one of America's most abundant renewable resources —biomass—we can significantly displace fossil fuel-based sources of thermal energy.

Without a nationally accepted standard and instrumentation for measuring heat, thermal energy is too often left out of the discussion for policies such as Renewable Portfolio Standards and tax incentive programs. BTEC supports the development of a technology agnostic heat standard, inclusive of our nation's many renewable thermal resources, such as biomass. The EPA's proposed U.S. Heat Metering Standard will allow utilities, states, and federal programs to measure the many benefits of renewable energy resources and technologies for thermal applications.

BTEC welcomes the opportunity to support the development of this standard and strongly believes it will help further the development and use of thermal energy resources nationwide.

Best regards,



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December 16, 2011

Mr. James Critchfield
U.S. Environmental Protection Agency
Climate Protection Partnerships Division
Climate Technologies and Distributed Generation
Email: critchfield.james@epa.gov

RE: Comments from the Biomass Thermal Energy Council on Development of a U.S. Heat Metering Standard

Dear Mr. Critchfield:

The Biomass Thermal Energy Council (BTEC) supports the Environmental Protection Agency's (EPA) development of a proposed U.S. Heat Metering Standard. Due to the proposal's direct interaction with both end users and the supplier in the biomass thermal community, I would like to take this opportunity to submit comments on the draft proposal.

There are several instances in the proposal in which solar thermal and geothermal are explicitly referenced. Considering the scale of biomass thermal, with consumption of biomass for thermal applications totaling 2.4 quadrillion BTUs in 2008, it would be appropriate to specifically list biomass as well.¹ For example, BTEC recommends the revision of page 1, paragraph 1 of Justifications/Benefits to include following additions (**in bold**):

“The development of a heat meter standard could apply to instrumentation that serves several thermal energy markets, including commercial and residential solar hot water, space heating and cooling, process heating, **biomass for residential, commercial, and industrial heating**, and groundsource thermal energy applications, among others.”

Similar instances within the proposal make reference to solar thermal and geothermal technologies (e.g. page 2, paragraph 4), and these again are opportunities to include the biomass thermal pathway.

In the discussion of state Renewable Portfolio Standards (RPS) on page 2, paragraph 1, there are several states that include biomass thermal in their RPS, including Wisconsin, Arizona, and North Carolina.

- Arizona allows biomass thermal systems to assist in generating RECs based on BTU measurements, and North Carolina includes the thermal output of combined heat and power systems that utilize biomass for RECs.^{2 3}
- North Carolina also allows for RECs derived from thermal energy output of combined heat and power facilities that use poultry waste.⁴
- Vermont, New Hampshire, and Massachusetts are all currently considering including biomass thermal in their RPS's.^{5 6 7}

BTEC recommends that these states be reflected in the proposal in order to accurately portray the current state of thermal energy in RPSs.

Again, BTEC appreciates the EPA's efforts in developing a national heat metering proposal and looks forward to the opportunity to provide comments and feedback throughout the process.

Best regards,



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¹ EIA Renewable Energy Annual 2008. Renewable Energy Consumption for Nonelectric Use by Energy Use Sector and Energy Source (2010) <http://www.eia.gov/cneaf/solar.renewables/page/trends/rentrends.html>

² Arizona Renewable Portfolio Standard (2006) <http://www.azcc.gov/divisions/utilities/electric/res.pdf>

³ North Carolina RPS Bill (2007) <http://www.ncga.state.nc.us/Sessions/2007/Bills/Senate/PDF/S3v6.pdf>

⁴ General Assembly of North Carolina Senate Bill 710 (2011)

<http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2011%20%20&BillID=s710>

⁵ Public Review DRAFT 2011 of the Comprehensive Energy Plan, Vermont department of Public Services (9/2011)

<http://www.vtenergyplan.vermont.gov/sites/cep/files/Vol%20I%20Public%20Review%20Draft%202011%20CEP%201pg%20view.pdf>

⁶ 2011 Renewable Energy Portfolio Standard Review - Report of the New Hampshire Public Utilities Commission to the New Hampshire General Court (11/2011) <http://www.puc.state.nh.us/Sustainable%20Energy/RPS/RPS%20Review%202011.pdf>

⁷ Massachusetts Department of Energy Resources draft RPS biomass regulation <http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/biomass/renewable-portfolio-standard-biomass-policy.html>