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Submitted to: GHG.Guidance@ceq.eop.gov

Council on Environmental Quality
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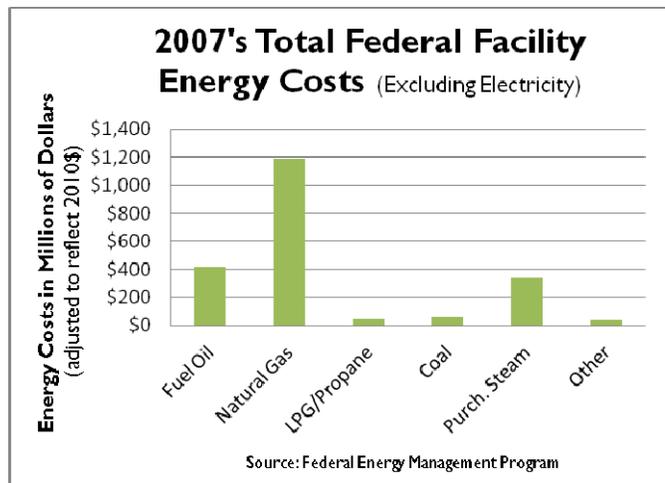
RE: Comments from the Biomass Thermal Energy Council on Draft Federal Greenhouse Gas Accounting and Reporting Guidance and the Inclusion of Non-Electric Renewable Energy

The Biomass Thermal Energy Council (BTEC) appreciates the opportunity to submit comments on the White House Council on Environmental Quality’s (CEQ) Draft Revised Federal Guidance on GHG Emissions. BTEC is a nationwide industry association representing the views of biomass feedstock producers, fuel refiners, appliance manufacturers, vendors, non-profits, and end users. Through consumer education and industry outreach, BTEC seeks to advance the market for biomass thermal energy and promote the use of high efficiency products and locally produced renewable biomass.

Today’s comments to CEQ address the role non-electric renewable energy can play in reducing federal facilities’ greenhouse gas emissions (GHG) while also reducing energy costs.

—Biomass Can Substantially Reduce Federal Facility Energy Costs and Emissions

BTEC welcomes CEQ’s inclusion of thermal energy from biomass in its federal guidance. Heating and combined heat and power (CHP) are the most efficient energy pathways for domestically produced, renewable biomass fuel. And, given the ever escalating cost of fossil fuels, biomass for heating and CHP presents a compelling economic and fiscal alternative for federal facilities of all sizes and types; biomass heating fuels have historically been less expensive per million British Thermal Unit (MMBtu) than fossil fuels like #2 Heating Oil, Propane, and even natural gas.¹ For example, wood pellets (a common biomass fuel) are nearly half the cost per MMBtu when compared to #2 Heating Oil.



There is a tremendous opportunity for the federal government to exert continued leadership in the adoption of renewable energy generation, especially from non-electric renewable energy sources like

¹ Analyses from FutureMetrics, data from U.S. Energy Information Administration and regional Sources, Feb. 2012, available online at <http://www.futuremetrics.net/>. The graph is available in Appendix A.

biomass thermal. The Federal Energy Management Program has reported that in 2007 (the most recent year data are available), the *federal government spent approximately \$2 billion on facility energy costs, excluding electricity.*² This represents significant energy expenditures on non-renewable—and frequently more expensive—fossil fuels. Biomass heating and CHP can provide federal facilities the dual benefits of decreased facility energy costs and real-world greenhouse gas (GHG) reduction progress towards Executive Order 13514. Further, the technology and fuels are proven, scalable, and commercially available nationwide.

—Conclusion

Again, BTEC expresses its support of CEQ for its recognition of non-electric sources of renewable energy in federal GHG reduction guidance. Leadership from entities like CEQ will help move the federal facilities transition to locally produced, renewable, and more affordable fuels. The current fiscal and environmental climates demand reductions in fossil fuel use, and the biomass thermal industry stands ready to meet them with a domestic and secure energy pathway. There are numerous examples of federal facilities already embracing renewable thermal energy:

- U.S. Forest Service – White Mountain National Forest administrative complex in Campton, NH, with a 1 MW wood pellet heating system;
- General Services Administration – Biomass boiler at the Ketchikan Federal Building in Ketchikan, AK, with a projected reduction in fossil fuel use by at least 50% in the first year;
- U.S. Department of Energy – Biomass combined heat and power facility at the Savannah River Site, SC, which is projected to save \$34 million in utility costs in the first year alone;

Despite this progress, much more could be done, and by adopting biomass heating and CHP fuels and technologies, the federal government will address its GHG reduction goals while also saving money on operating costs after the initial capital outlay is paid off by savings. Should CEQ seek additional comments or recommendations on increasing the use renewable biomass at federal facilities, please do not hesitate to contact us with the information provided below.

Best regards,



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² U.S. Department of Energy, Federal Energy Management Program, “Annual Federal Government Energy Use and Costs by Agency, 1975 – 2007,” <https://explore.data.gov/Energy-and-Utilities/Annual-Federal-Government-Energy-Use-and-Costs-by-/pib3-yjd4>, 17 Aug. 2011, April 10, 2012.

Appendix A

Historical Biomass Heating Fuel Costs vs. Selected Fossil Fuels (1995-2011)¹

