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April 29, 2021

U.S. Department of Agriculture
Office of Energy and Environmental Policy
Attn: William Hohenstein, Director
CCPOOCE@usda.gov

RE: Docket No. USDA-2021-0003, Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad

The Combined Heat and Power Alliance ("CHP Alliance") is the leading national voice for the deployment of combined heat and power ("CHP"). We are a diverse coalition of business, labor, contractor, non-profit organizations, and educational institutions with the common purpose to educate all about CHP, and how CHP can make manufacturers and other businesses more competitive, reduce energy costs, enhance grid and customer reliability, and reduce emissions.

The CHP Alliance appreciates the opportunity to submit comments to the U.S. Department of Agriculture ("USDA") on Docket No. USDA-2021-0003 regarding USDA's climate strategy on tackling the climate crisis at home and abroad. In particular, the CHP Alliance submits comments on question 2—Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions—outlining how there is ample potential for CHP systems to utilize biofuels, bioproducts, and other forms of renewable energy sources.

2. Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions:

A. How should USDA utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy?

B. How can incorporating climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems support rural economies and green jobs?

C. How can USDA support adoption and production of other renewable energy technologies in rural America, such as renewable natural gas from livestock, biomass power, solar, and wind?

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In response to the biofuels, wood and other bioproducts, and renewable energy questions, the CHP Alliance recommends that the USDA explore the significant opportunities for the use of CHP in food processing, renewable fuels plants, and other facilities within the agricultural and industrial sectors, in order to encourage greater deployment of biofuels, sustainable bioproducts, and renewable energy.

CHP is a well establish technology being used by the agricultural community for decades. In the U.S., there are nearly 500 CHP systems totaling 5.7 gigawatts of power in the agriculture and food processing industries.[1] However, the potential is far greater. A 2016 Department of Energy ("DOE") technical potential report noted that there are over 9,600 sites and more than 9 gigawatts of potential for CHP in the food processing sector alone.[2]

Additionally, it is proven that CHP systems can be powered by a variety of clean fuels—agricultural biomass, digester gas, landfill gas, liquid biofuel, solid biomass, and wood. The same DOE report states that nearly 1.5 gigawatts of industrial CHP capacity in America is powered by biomass and biofuels, most frequently used in industries such as food processing where viable and reliable on-site biogas and biomass resources can be utilized to produce power.[3] Moreover, the number of CHP installations using renewable fuel types has increased substantially in recent years, nearly doubling since 2010, with over 770 CHP systems providing more than 4 gigawatts of clean power across industrial and commercial applications.[4]

Not enough attention has been paid to these opportunities and benefits CHP can provide. There is a growing, imminent need to deliver renewable and decarbonized sources of heat, especially in industrial and agricultural sectors. When pairing CHP with low carbon fuels such as renewable natural gas and green hydrogen, its efficient use of those fuels can significantly lower greenhouse gas emissions. There are large industrial customers forming coalitions[5] seeking renewable heat, and CHP can act as a tangible solution for both the heat demand and carbon commitments of those industrial and agricultural customers.

USDA should use all of its financing and regulatory tools to advance CHP applications in the agriculture community and in combination with renewable fuels. We specifically recommend partnering with DOE's Advanced Manufacturing Office, the CHP Technical Assistance

[1] Department of Energy. "Combined Heat and Power Installation Database." February 21, 2021. https://doe.icfwebservices.com/chp
[2] Department of Energy. "Combined Heat and Power (CHP) Technical Potential in the United States." March 2016. Appendix C. https://www.energy.gov/sites/default/files/2016/04/f30/CHP%20Technical%20Potential%20Study%203-31-2016%20Final.pdf
[3] Department of Energy. "Combined Heat and Power (CHP) Technical Potential in the United States." March 2016. Page 12. https://www.energy.gov/sites/default/files/2016/04/f30/CHP%20Technical%20Potential%20Study%203-31-2016%20Final.pdf
[4] Department of Energy. "Combined Heat and Power Installation Database." February 21, 2021. https://doe.icfwebservices.com/chp
[5] The Renewable Thermal Collaborative. https://www.renewablethermal.org/

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Partnerships (TAPs), and the Federal Energy Management Program to fully identify the best opportunities to advance CHP and its combinations with decarbonized and renewable fuels.

The CHP Alliance respectfully asks the USDA to consider the recommendations put forth in these comments and realize the potential CHP has to offer in the promotion of clean, renewable fuels in the agricultural community.

Kindest Regards,

David Gardiner
Executive Director