

**Comments to the U.S. Army Engineering and Support Center
FAR 52.215-3
from the
Alliance for Industrial Efficiency, Association of Union Constructors,
Heat is Power Association, Mechanical Contractors Association of America,
Sheet Metal and Air Conditioning Contractors' National Association
and U.S. Clean Heat and Power Association
21 March 2012**

The Alliance for Industrial Efficiency, Association of Union Constructors, Heat is Power Association, Mechanical Contractors Association of America, Sheet Metal and Air Conditioning Contractors' National Association, and U.S. Clean Heat and Power Association commend the U.S. Army for seeking to procure reliable, locally generated renewable and alternative energy. Such energy purchases will enhance military security, lower energy costs, create markets for innovative technologies, and reduce pollution.

Our comments are quite simple – we want to ensure efficient combined-heat-and-power (CHP) and clean waste heat-to-power (WH2P) projects qualify for the acquisition. We're pleased to notice CHP mentioned in the Performance Work Statement, as well as the Statement's recognition of thermal generation and hot water generation. Yet we'd welcome more specificity and hope you will identify WH2P as a renewable resource and list CHP as an alternative energy technology.

Twelve states now classify waste heat-to-power as a renewable resource in their portfolio standards. By capturing vented heat and pressure drop from industrial and commercial applications, WH2P supplies clean power without burning any additional fuel or emitting any additional pollution. Some WH2P facilities also utilize the remaining low-temperature heat to help meet a facility's thermal needs.

The recently introduced Clean Energy Standard Act pays particular attention to fuel-fired CHP's efficient generation of both electricity and thermal energy, and the Senate provision provides credits for each. Compared to the nation's average grid efficiency of just 33 percent, CHP units reach 80 percent efficiencies, saving money and reducing pollution. The act would provide WH2P with one full credit for every megawatt generated, just as with all other sources of emissions-free electricity.

When utilized as part of district energy systems, CHP and WH2P technologies enhance a military facility's security, lower its costs, and reduce its emissions. Such projects also provide a stable, base load supply of clean power. These applications, therefore, help balance the intermittent generation of solar and wind technologies, thereby increasing the grid's reliability and stability.

We appreciate the U.S. Army's leadership and thank you for your consideration of our comments.

The Alliance for Industrial Efficiency (AIE) is a coalition of business, labor, and non-profit organizations who advocate for policies to increase U.S. manufacturing competitiveness through industrial energy efficiency, especially the use of Combined Heat and Power (CHP) and Waste Heat Recovery (WHR). For more information, visit the Alliance website at: <http://www.dgardiner.com/alliance.html>

The Association of Union Constructors (TAUC) occupies a unique space in the nation's capital as the premier national trade association for the union construction industry. TAUC is made up of more than 2,000 contractor companies that utilize union labor for their projects, as well as local contractor associations and vendors in the industrial maintenance and construction fields. More information can be found at www.tauc.org/

The Heat is Power Association is the trade association of the waste heat-to-power (WH2P) industry. Representing businesses everywhere, the not-for-profit association is committed to educating decision makers and the public about the benefits of waste heat as an economic driver and resource for emission-free electricity. For more information, visit www.heatispower.org.

The Mechanical Contractors Association of America (MCAA) serves the unique needs of approximately 2,500 firms involved in heating, air conditioning, refrigeration, plumbing, piping, and mechanical service. We do this by providing our members with high-quality educational materials and programs to help them attain the highest level of managerial and technical expertise. MCAA includes the Mechanical Service Contractors of America, the Plumbing Contractors of America, the Manufacturer/Supplier Council, the Mechanical Contracting Education and Research Foundation and the National Certified Pipe Welding Bureau. For more information, visit www.mcaa.org.

The Sheet Metal and Air Conditioning Contractors' National Association (SMACNA) is an international association of union contractors, has 1,834 members in 101 chapters throughout the United States, Canada, Australia and Brazil. SMACNA members perform work in industrial, commercial, institutional and residential markets. They specialize in heating, ventilating and air conditioning; architectural sheet metal; industrial sheet metal; kitchen equipment; specialty stainless steel work; manufacturing; siding and decking; testing and balancing; service; and energy management and maintenance. More information is at www.smacna.org.

The U.S. Clean Heat and Power Association's (USCHPA's) mission is to increase deployment of combined heat and power systems in the U.S. in the industrial, commercial-institutional and residential sectors. Operating under the principle that "all CHP is good", USCHPA provides superior advocacy, networking, education, and market information to companies in the business of CHP and works to develop sound clean energy policy and marketplace solutions that support investment in combined heat and power. More information can be found at www.uschpa.org.