



**Black & Veatch, SC Resource Study
CCL Comments
2.28.2012**

General

While the Black & Veatch report does an adequate job of outlining the renewable resources available in South Carolina, as well as highlighting a number of the challenges associated with developing these resources, there remains a dearth of information on the benefits of renewable energy and the policy options that could increase utilization of these resources in South Carolina.

A final report on renewable resource potential in South Carolina by the PURC Energy Advisory Council should include the following:

- Catalogue of viable renewable resources available in South Carolina
- The average cost range associated with developing these resources
- Policy impediments to investment, e.g.
 - o Inadequate net metering/interconnection standards
 - o Lack of adequate incentives
 - o Lack of cost recovery mechanisms for utilities
- Potential benefits of developing these resources, e.g.
 - o Efficiency and grid advantages of distributed generation
 - o Economic development and job creation potential
 - o Human health improvements
 - o Environmental protection
- Additional policy options that have been successfully implemented in other states, e.g.
 - o Portfolio standards
 - o Improved incentives
 - o Updated net metering/interconnection standards
 - o 3rd party energy sales
 - o Cost recovery mechanisms for utilities
 - o Decoupling
 - o Sustainability standards for the sourcing of biomass resources
- Background memorandums from the Nicholas Institute, e.g.
 - o Addressing intermittency
 - o Price decline of renewables

- Coupling energy efficiency with renewables
- Model net metering and interconnection standards
- Economic development and job creation opportunities and estimates
- Sustainable harvesting guidelines for biomass

Wind

- No justification of viewshed limitations has been provided by B&V, and therefore the reduction in constrained potential appears to have been arbitrary
- An update of currently installed land based turbines is needed
- Some mention should be included of the newly formed SC Offshore Wind Task Force and their work related to identifying potential offshore wind locations
- An additional barrier for wind investment in the state that should be mentioned is the prohibition of 3rd party sales of electricity

Solar

- Need to update the solar installations count to include Boeing and other recent projects
- An additional barrier for solar investment in the state that should be mentioned is the prohibition of 3rd party sales of electricity

Biomass

- Combined heat and power (CHP) systems, discussed in Section 9.1 of the B&V report, can improve the performance of biomass projects by 25% or more, i.e. the amount of wood needed for traditional boilers to produce 1000MW is the same amount needed for CHP systems to generate the equivalent of 1250MW
- If the B&V study restricts its focus to waste streams, thus avoiding contentious issues such as burning whole trees to generate electricity, then a deeper discussion of the necessary policy changes required to limit increased wood demand to these waste streams is needed
- The current 3-year exemption of biomass facilities from federal Maximum Achievable Control Technology (MACT) regulations should be pointed out as a future cost escalator for biomass resources
- An additional barrier for biomass investment in the state that should be mentioned is the prohibition of 3rd party sales of electricity