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To: COMMISSION DE ENERGIA DE PUERTO RICO

RE: Section 3.03 Page 13 Combined Heat- and -Power Microgrids

We are requesting a point of Clarification on the thermal output of 50% as well as the fuel input of no more then 7,000 Btu per kwh.

1. If we understand this correctly the total heat rate of the energy producer can have a 14,000 Heat rate. I.E. (50%) 7000 btu's for electricity and (50%) 7000 btu's for thermal processes. If this is the case, then the commission is ok with inefficient power plants like the ones that PREPA currently operates. It is our understanding that the Island wants to clean up it's air and produce electricity in the most efficient way. Solar is available 5.5 hours a day, meaning that large storage systems will have to be installed or as in the case of 3.02 a Hybrid system. Although using solar in combination with batteries and a prime mover is the best practice, the islands layout will not condone this. There is no adequate land in the cities to do this. I do feel that the commission needs to lower the heat rate allowed on systems totaling more than 1mW to promote cleaner air.

Sincerely

Mike Kennedy