

**Sonia Seda**

---

**From:** Edmonson, Cole <Cole.Edmonson@kimley-horn.com>  
**Sent:** Friday, November 17, 2023 8:28 AM  
**To:** Comentaros  
**Subject:** Comments on Microgrid Development Requirements

Good morning,

I am writing this email to provide comment on a specific requirement in the microgrid development regulations:

Section 3.03 – Combined Heat-and-Power Microgrids

There is a requirement for the thermal energy output to be no less than fifty percent of the total energy output. In short, heat efficiency must exceed electrical efficiency. I believe the spirit and intent of this provision is to require efficient heat capture systems as part of CHP generators. For typical gas fired CHP generators, this is possible; however, for natural gas fuel cell energy systems with CHP, it is not possible to obtain a heat efficiency greater than electrical efficiency. The benefit of a fuel cell CHP system is two fold: 1) the total efficiency of the system (electrical + heat) can exceed that of a traditional system, and 2) the exhaust byproduct contains significantly less harmful emissions.

My request is that there be an exception granted for fuel cell technologies when used for CHP Microgrids.

Thanks,

**Cole Edmonson, P.E., S.E.** | Vice President  
**Kimley-Horn** | 11720 Amber Park Drive, Suite 600, Alpharetta, GA 30009  
Direct: 770-545-6102 | Mobile: 864-787-2180  
[cole.edmonson@kimley-horn.com](mailto:cole.edmonson@kimley-horn.com) | [www.kimley-horn.com](http://www.kimley-horn.com)