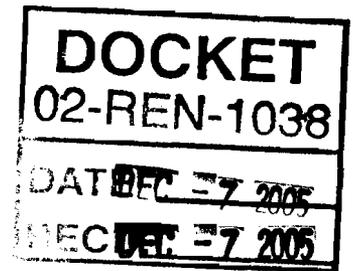


STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION



In the Matter of:)
Implementation of Renewables Investment Plan) Docket No. 02-REN-1038
Legislation (Public Utilities Code Sections) RE: Emerging Renewables Program
381, 383.5, and 445; [SB 1038])¹) Guidebook

Comments of the Union of Concerned Scientists
on the Proposed Changes to the
Emerging Renewables Program Guidebook

The Union of Concerned Scientists (“UCS”) appreciates the opportunity to comment on the California Energy Commission’s (“CEC”) proposed changes to the “Emerging Renewables Program Guidebook.” While the proposed changes generally retain the existing rebate structure, UCS is unclear how this structure comports to the “2006 Renewable Energy Investment Plan Staff Draft,” which recommends the Emerging Renewables Program funds be fully allocated to implementing the Million Solar Roofs Initiative (“MSRI”).² In the most recent language of Senate Bill 1 (Murray), the MSRI would include small wind up to 50 kilowatts.³ However, the Public Utilities Commission (“PUC”) will propose a California Solar Initiative (“CSI”) in a report to be issued by December 15.⁴ While the details of the CSI have yet to be publicly released, a draft decision issued by the PUC on November 15 indicates that the CSI will “[a]pply incentives to photovoltaic projects, solar-thermal electric projects, and solar hot water heaters,”⁵ with no mention of small wind or renewable fuel cells, technologies that are currently funded under both the Emerging Renewables Program and the PUC’s Self-Generation Incentive Program.

Small wind technologies should continue to be funded through the Emerging Renewables Program. UCS has no objection to small wind being included in either the MSRI or CSI when such a program is developed. If the future program, and not the Emerging Renewables Program, becomes the funding vehicle for small wind, UCS hopes this change in funding structure will be made publicly known at the earliest possible opportunity in order to reduce uncertainty to participants.

¹ Amended and recast as Public Resources Code sections 25740 through 25751 pursuant to SB 183 (stats. 2003, Ch. 666)

² California Energy Commission, “2006 Renewable Energy Investment Plan Staff Draft Report,” Publication CEC-300-2005-024-SD, November 2005, pp. 24-25.

³ Proposed Senate Bill 1, California Legislature Session 2005-06, proposed Public Resources Code §25744(b)(3).

⁴ Public Utilities Commission, “Interim Order Adopting Policies and Funding for the California Solar Initiative” (Draft), issued in Rulemaking 04-03-017 on November 15, 2005, p. 13.

⁵ *Id.*, p. 6.

Advances in small wind technology are likely to bring costs down over time, but a cessation of incentives could stifle technology innovation. New small wind manufacturers are currently entering the California market. As California continues to increase its use of renewable resources, small wind should be encouraged to play a role in a clean, balanced, and diversified energy portfolio.

UCS appreciates the opportunity to provide comments on the proposed changes to the Emerging Renewables Program Guidebook.

Respectfully submitted,

/s/

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Dated: December 7, 2005

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Subject: Docket # 02-REN-1038: UCS comments on Emerging Renewables Guidebooks

Attached please find the "Comments of the Union of Concerned Scientists on the Proposed Changes to the Emerging Renewables Program Guidebook" in PDF format, filed in Docket Number 02-REN-1038. A hardcopy of this filing was mailed to the Dockets Unit today. Thank you.

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