

Thank you for putting together this workshop for the CEC ERP program.

We appreciate the amount of time your group set aside to have this workshop and the feedback from all participants.

Below are the comments and recommendations we have on the topics discussed.

Incentive Structure:

- Recommend removing the incentive based on "nameplate" generator rating. The manufacturer kW rating of a turbine has nothing to do with actual energy production. If an incentive is based on a kW rating, we agree this should be based on a measured and certified Power Curve at 11m/s wind speed. Then all manufacturers are being incented at the same basis.
- Ultimately, an incentive based on Energy Production is the ideal scenario because a customer would only be paid out on turbines actually producing power at the wind speeds determined at the site. A Feed-in-Tariff proposal, which would also tie in Eligible Equipment (listed below) would allow for a successful long-term program for small wind in California. This would also allow for consumers to have the best type of program long-term. Countries in Europe have adopted this type of program for years successfully, where a Power Purchase Agreement is signed for a 15-20 year period.
- Production based incentives are most favourable and recommended if this causes the CEC ERP program to be delayed for several months until such a program can be adopted, then so-be-it. For the long-run, this would be the most efficient and effective program.

Wind Resource Analysis:

- Require information on each application for wind resource at the specific project site, and how the wind resource was obtained.
- Allow for a variety of accepted methods of obtaining this information, such as the following:
 - o There are a variety of wind maps available for California (NREL, US Wind Energy Resource Atlas, and others)
 - o There are companies who have software for wind measurements (3Tier, Wind Navigator, New Roots)
- Anemometers installed at site for minimum of 12-months, specifying the height of the readings, is the most accurate, but also most costly option for measuring the wind speed...this would delay many projects, and quite possibly de-rail projects.
- We believe the computer models listed above would be sufficient for the measurements of small wind turbines.

Eligible Equipment Listing:

- Remove the option of self-certification, and do not use the existing eligible turbines on the list; wipe this slate clean of the probable turbines which should not be there in the first place. Do this effective immediately.
- Certification required for the program to re-commence. At the outset, we recommend using both the MCS Certification Eligibility turbines (United Kingdom) and/or NYSEDA Eligible Turbines. If a manufacturer wants to participate in the CEC ERP program, they should be on these lists. This would enable the program to be re-instated within a few short months.
- Once SWCC turbines are actually certified (end of 2011), manufacturers can have their turbines added to the list of eligible turbines (perhaps set a date of Jan 2012 to review the SWCC results)
- No rooftop turbines period. No Vertical Axis Turbines period. Both of these technologies have been proven time and again by industry associations that they are not valid solutions for the small wind industry. They produce little to no power, and do not meet with the goals of the CEC ERP.

One final note,

- We strongly recommend not allow the payments to proceed to the companies involved with exploiting the ERP program, which caused the suspension of the program. These so-called "projects" are not fulfilling the essence of the program, and they are not positive for the small wind industry in the long-term.

If you require any clarification or if you have any questions about this information please let me know.
Thank you for the opportunity to participate and provide feedback on the program.

Regards,

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