

## **Gridnot Docket to CEC**

One of the entrenched wind turbine suppliers is practically claiming responsibility for the ERP program shutdown because of the discussion about the proposed failed Dyocore turbines on the blogs. The chatter seems to imply we need a stringent test standard to prevent bad technology from making it onto the CEC list. These people have vested commercial interest in the program and may be using the possible failure of the Dyocore turbines for their own financial benefit.

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Instead of creating road blocks that will benefit entrenched interests, there is a simple and better way to fix the program and make it honest.

And that is to provide incentives based on proven performance. By using performance-based incentives, if good technology is installed in a low wind area it does not pay or if bad technology is installed it does not pay.

Here are a couple of examples of implementations of a Performance-based Incentive for wind could be accomplished.

### **Simplest solution**

There are 43800 hours in a five year period of time. A 15% resource with a turbine rated at 1kW should produce 6570 kWh. ( $43800 \times .15 \times 1 \text{ kWh}$ )

1kW is worth a \$3000 rebate / 6570 kWh = .45 cent per kilowatt-hour per year for 5 years for systems 30kW and under.

This would rapidly stimulate the growth of the wind economy related jobs and support industries.

### **Another model that provides more bridge capitalization.**

Pay \$1.5/watt rebate up to 30kW.

For turbines 10kW or less pay an additional performance based incentive that pays an equivalent of an additional \$1.5/watt over 5 years.

1kW is worth \$1500 rebate divided 6570 = .23 cent per kWh per year for 5 years.

15% is an arguable number for a good wind resource.

Report the results yearly based on commission day using either the utilities net-metering results or install a utility grade meter visible to the utility meter location which can be read and reported.

### **Performance based incentives will accomplish California's goals**

Installment standards that benefit one technology or class of products would be counter-productive to fostering the wind industry in California. The CEC certification program should not be monopolized and steered by any one interest group. Currently CEC listed turbines, unless proven faulty, should not have to be re-certified. Requiring expensive entry fees will stifle the industry and discourage new ideas from reaching the market place. Performance rebates are much more honest and fix most of the associated problems with poor locations or technology.

## **We need to look at ideas that will provide the most benefits to California**

If a bridge capitalization model is adopted there is a definite need to revamp the current certification standards to keep the system honest. A standardized test needs to be implemented for new entries on the list. Ratings should take into account grid exportable power using the listed inverters. Real world results are more realistic than expensive wind-tunnels tests. Our recommendation would be for the CEC to provide test sites for companies to prove their equipment using listed inverters.

One idea would be to use selected California colleges campuses in wind resource areas to provide certification. Allow companies to install turbines at campuses that agree to participate. Using advanced monitoring equipment to produce real world results could allow the certification process to be shortened to 6 months for participants.

This would provide power to the campuses as well as foster wind and renewable energy curriculum needed for us to be competitive in the world market place. This would lower the obstacles for small companies trying to develop new technology resulting in more ideas coming into the marketplace.

## **Streamlining Rebate Processing**

Currently the Commission appeared to be inundated with a flood of applications to process. This will continue regardless of the decisions on testing and rebates. We would like to see a system similar to the Powerclerk that is currently used to manage the solar rebates. That system moves much of the workload onto the vendors with document scanning and submission and lessens the response time required. This system also has the added benefit of allowing customers and vendors to track the rebate status without having to make the phone calls. The system would save a substantial amount of staff time thereby reducing the costs of administering the program. This kind of system could also simplify performance-based rebates if implemented.

## **Summary**

We are looking at what is best for the environment and for California. Obviously, wind has a roll to play in the goal of distributed electrical production and the reduction of fossil fuels. I believe we all share this as a common cause. California needs jobs. California needs its economy recharged. We can do our part in this through the thousands of households that will use this technology. In our initial calculations, the city of Hesperia will develop a production income of 150,000 and 200,000 dollars per month. This extra income will be used in a variety of ways, and a lot of it will find its way back into local businesses, stimulating the economy and increasing the number of permanent jobs. 1,000 installations will take months of full-time work by numerous local crews. The raw materials, wire, conduit and other electrical necessities will be purchased locally.

The suspension of the program has stifled the development of high paying construction jobs needed in the San Bernardino high desert region. This ratepayer money needs to be spent on its intended purpose not squandered into the general fund. We need to foster this in California to be complete leader in the world market place.

Sincerely,

Eugene Buchanan