



# DOCKET

02-REN-1038

DATE	April 15 2011
RECD.	April 15 2011

April 15, 2011

To Whom it May Concern:

I would like to respond to the April 14<sup>th</sup> workshop, as it related to the suspension of the ERP.

I thank you for giving us an opportunity to continue our negotiations with our existing clients by extending the existing rebate level 30 days after the suspension is lifted.

### **Incentive Structure**

1) As manufacturers like DyoCore have presented an anomaly for the present ERP. It would be Aero Wind Energy's position that you would try and keep the system in tact where possible. Our marketing program has focused on the agriculture element here in California. As such, we are making great inroads as it relates to giving the farmer and rancher an opportunity to offset their huge utility bills by implementing the renewable power of our 25kw wind turbines.

2) We would further hope that rebating the total amount "up front" would gratefully help the agriculture sector on their start up costs of purchase. Unlike the smaller units that are causing the existing problems with the ERP, the Aero Wind Energy AWE25's are a very large investment for most of our clients. Because they provide 20,000Kwh - 40,000Kwh per year, depending on the wind resource, we feel that the amount rebated is of importance to the bottom line of the clients business, and very useful to the utility company that they are connected to.

### **Wind Resource Analysis**

3) It would be our hope that the software available today is sufficient for your needs. There are a number of excellent government and private firms that have data collection available to us for the required locations needed. This would expedite the time factor of recording long term data that is already available.

4) By having a "one size fits all" look at the wind resources is not equitable for the many styles of turbines on the market. We have designed our blades to the Class 1 and Class 2 wind zones that are predominantly in California. Many wind turbines don't synchronize until 9-10 mph. Our design of blades will start to produce power at 6.7 mph. Therefore, the expected performance of the varied wind turbines produce very differently at different wind speeds. Our Weibull Curve studies show that the typical Class 1 wind zone here in California, our 25kw wind turbine will produce one-half of it's harvest from 12mph or less.

Cont.

### **Eligible Equipment Listing**

5) While one of the proposed requirements is to have reported data for 12 months of continuous collection at 12 mph, the vast majority of California is in the 11.7 range or lower. As such our blade development was intended to perform very well below 12mph. At a 12mph class of wind we would have to “de-pitch” our blades, which is counter productive as to its design. We would hope that the ERP would have consideration as to the performance and over-all productivity of the wind turbines, and not have to be specific as to the upper level of wind. This could be accommodated by demonstrating the power produced at the meter, and proven by the utility company’s billing and data on a monthly basis, as the CEC could require.

6) To presently certify the intended eligible equipment to the IEC 61400-2 standards, SWCC, NREL or the many other non-profits, the costs are initially high for the small manufacturer. The approximate price of \$65,000.00 per model hopefully can be transferred over a longer period. The performance of the wind turbines can presently be verified by the data collected by the utility company. The civil and structural engineers are presently specifying the foundations and towers. It was obvious at the workshop that the equipment that is presently certified, and represented by their agents present, want the “slate wiped clean” so the small manufacturers would have to comply with the \$65,000.00 price tag. As a company with an emerging product, this would be a barrier to the on going success of Aero Wind Energy. Hopefully another option can be forthcoming as to how we can certify without the up front costs. While our product is certified to the ISO and CE standards, and the inverters are UL1741 certified, it is our hope to “buy” some time to coordinate with the ERP to come into compliance. We already have the R-3, (5 year warranty), applied, and as such will keep the product improving, which is not the requirement of the ERP, but the intention of a successful company. There are presently complaints against ReDriven, DyoCor and Zhejiang Huaying Wind Power Generator Co. It is our opinion that these are the companies that should be scrutinized and made to come into compliance, as they have evident short coming. That is the danger.

Thank you for your time and consideration.

Sincerely;  
D. Scott Jackson  
President/Founder  
Aero Wind Energy, Inc