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RECD. Apr 15 2011

Dear Anthony, James, and Sarah,

My name is James Kerr, Product Marketing Manager at IdaTech (fuel cell manufacturer). I attended the workshop that you hosted in Sacramento yesterday – thank you for putting this together. Here are comments from IdaTech regarding **02-REN-1038**, changes to the ERP Guidebook:

General Comments

- IdaTech recommends that the Emerging Renewables Program be reinstated immediately for fuel cells
- If this is not possible without separating fuel cells from the wind program, then IdaTech recommends separating the programs

Incentive Structure

- IdaTech recommends keeping the current ERP incentive structure (\$3/watt, upfront rebate)
- IdaTech is against changing the incentive structure to a percentage of a system's total cost and against performance based incentive.
 - Reasons: California's current rebate structure is easy for our customers to understand and changing it to a more complex structure will be perceived negatively by our customers. Our customers are typically large companies with complex organizations and budgets, and a complex rebate incentive structure will dissuade the economic buyer within our customer's company from pursuing this emerging renewables technology.

Program Eligibility Requirements

- In section I, System Performance Meter, please include the following statement, "Backup fuel cell power systems not connected to the local grid are not required to incorporate a system performance meter". This statement was provided to IdaTech by the CEC and we think it would be beneficial to have in the revised guidebook.
- In section V, Payment Process, sub-section 3, Final Building Permit and Final Inspection Sign-Off, please add a statement regarding a building permit not being required if the fuel cell system is not installed in or on a building (most of our installations are not in or on a building but at the base of a cell phone tower).

Please let me know if you have questions – and thank you for reviewing our recommendations.

Best regards,

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