



California Wind Energy Association

April 21, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 02-REN-1038
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

RE: CalWEA Comments on Proposed Changes to the Emerging Renewables Program

Dear Commission,

The California Wind Energy Association (CalWEA) has worked for the past decade to encourage and support the production of electricity through the use of wind generators. We appreciate the Commission's recent actions to halt small wind rebate payments and hold a *Staff Workshop on Proposed Changes to the Emerging Renewables Program Guidebook*. However, as pointed out by testimony offered by the Distributed Wind Energy Association (DWEA), we are dismayed by the approvals of reservations that appear to be based on substantially inflated claims for an estimated \$6.7 million in ratepayer funding.¹

We agree with DWEA that the program's loopholes should be firmly closed by requiring all wind turbines eligible for incentives to be certified by the Small Wind Certification Council (SWCC), allowing a grace period through December 31, 2011 only for turbine models with power performance tests conforming to AWEA 9.1 – 2009 or IEC 61400-12-1 that have been verified by the SWCC.

Incentive payments should be based on the standardized "AWEA Rated Power" in accordance with the SWCC-verified power curve, with rebate levels capped at no more than 40% installed cost and adjusted so that the portion available reduces gradually. CEC staff would benefit from entering into a technical support contract with the SWCC for approvals, reviews, guidance, and advice.

Moreover, the Guidebook's Audits and Inspections section should be strengthened to allow periodic reviews of operational performance, reliability, and warranty support, and removal of program eligibility for those with poor track records for cause. It is counterproductive for staff to have no ability to delist products that are substantially underperforming or failing in the field. These products reflect poorly on the entire wind industry and we believe they have no place receiving ERP funds.

¹ www.greentechmedia.com/articles/print/have-small-wind-manufacturers-exploited-loopholes-in-california-rebates/

Finally, CalWEA joins DWEA in strongly urging the CEC not to pay erroneously and fraudulently reserved ERP rebates, and to pursue recapture of the unearned portions of rebates paid to date.

Thank you for your attention to this important matter to ensure that confidence that small wind turbines assisted by ratepayer funds are rated consistently and tested for safety, function, performance and durability.

Sincerely,

/s/

Nancy Rader
Executive Director