

DOCKET

02-REN-1038

DATE

RECD.

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To whom it may concern:

Written comments regarding docket number 02-REN-1038.

Possible Changes to the Emerging Renewables Program (ERP).

I am pleased that this topic has reached this level of concern. Unfortunately, I have been involved in a couple of these "less than perfect installations" in which I was hired as a contractor to install poor quality wind turbines on short towers in low wind speed areas, fortunately I was a sub contractor and was not involved in the sales. I learned very fast that there was a wide spread problem. This experience set me on a course of study that has made me very selective about what I sell and where I install. I have also done research on different rebate programs and have concluded that a production based system is the only type that not only encourages the installation of more small wind turbines, but also ensures that those projects are located in places that will allow for sufficient energy production with quality turbines.

With the adaptation of such a system, the economic benefit to the program will be felt immediately. Removal of all of the projects that don't actually produce any power will give the CEC the opportunity to have a financially healthy program for many years to come. I believe that some of these funds should be spent on a third party wind speed verification firm (e.g. 3Tier or AWS Truepower) to analyze locations provided on the applications. They could make adjustments for tower height or the lack thereof. With these accurate wind speed numbers there would not be any need for minimum wind speed thresholds, as this would be redundant. Future technology which lower wind speed can be utilized will qualify without amendment. Verified wind speeds combined with production curves, ideally these production curves should be verified by an independent testing facility, incentives could be paid on an annual total number of kWh that each individual project produces. This would also enable the incentives to be paid up front, which is critically important for the continued growth of small wind in California.

Many of these ideas have been taken from successful programs like New York.

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