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<b>DOCKET</b>	
<b>02-REN-1038</b>	
DATE	AUG 01 2011
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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](mailto:docket@energy.state.ca.us)

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

Dear Commission,

As an early adopter of the emerging Small Wind industry eight years ago, CaGreenTeam fully supports consistent, fair testing standards applied to all small wind generation products from all manufacturers. We believe that the results of such testing should be communicated to distributors, retailers, and consumers in a clear, simple rating system so that meaningful comparisons can be made between products and informed choices can be made with confidence.

We do not agree with many of the changes being proposed to the rebate process and the manner being proposed of controlling pricing and business practices of the industry. We strongly object to CaGreenTeam and Dyocore being singled out by the Commission and being publicly defamed on the CEC website when no wrong-doing has even been established. It is unconscionable that the Commission proposes to remove the most promising new product in the industry from the approved list of products for rebates when all rebate applications have been based upon test results from the Commission's approved third party testing facility.

The devastation to the emerging small wind industry caused by the recent suspension of the Rebate program is unbelievable. The CaGreenTeam has invested large amounts of money to get an honest and reliable business going. We started with PAC-Wind, a company that was fraudulent in every possible way, which is why we left them behind. We lost a huge amount of money and know first-hand the problems resulting from over-stated performance specifications. Solid test results are critical to the success of the small wind industry on all levels.

Five years ago we joined Mariah power (Windspire energy), a startup company with cutting edge technology with their 30 ft vertical axis turbine. They have had humps and bumps for the past 5 years and we have stood by them through it all, absorbing enormous equipment and labor costs. We have kept two trained technicians working full time for two years just doing warranty work on

this product. Windspire Energy has continued to improve their product and today is the best VAWT on the market. They did not meet their stated and approved rating for 5 years due to design problems. Their product has qualified for rebates under this program throughout the process of field testing and improvement.

Now comes DYOCORE with their very innovative small turbine that can mount on roof tops, something that has never been possible before due to all the problems Mr. Burgy has stated; vibration, low wind and noise. The cutting edge technology has come through again, and with an American company right here in California! Isn't this the reason for the rebate program in the first place?

We need to support and encourage American companies to invest the huge Research and Development costs necessary to develop a new way of generating power in this country to reduce our dependence on foreign oil. However, the changes being proposed to the rebate program in many cases have the impact of restraining trade, over-controlling independent businesses, and undermining the confidence of consumers. This appears to be the opposite effect of what was intended by the program.

Before getting involved with Dyocore, we were skeptical about the product and spent a lot of time investigating, and seeing demonstrations. The company (DYOCORE) bought a wind tunnel and proved to us it could produce the power it was rated for in a wind tunnel. We understand, as I am sure you do, that real life experience is not going to be as good as the wind tunnel. However, a prudent manufacturer will continue to make improvements based on data from installations in the field, and as Windspire has demonstrated, can become the "new best thing" out there.

Now to the point of our history and comment: CaGreenTeam, as well as many other dealers, has a product they can trust from DYOCORE. We believe it will continue to grow and continue to improve. The solar and wind combination provide a much lower starting wind speed, something needed on small wind generators located close to the ground. The light weight units can be mounted on poles, roofs or even fences, making it an easy install and in the case of warranty work, easy to replace or repair. This product will in time be "The next best thing in HAWT technology".

We don't believe DYOCORE or CaGreenTeam has misled anyone with this product or our applications for rebates under this program. We hear things like "with those small blades it just can't extract that much from the wind". While this is a valid concern, let's give Dyocore a chance to do just that. Just a few short years ago, we didn't think we could make power from anything that was not 300 feet in the air, that was noisy and needed a crew to maintain. Remember 25 years ago the computer that took a building to house is now less powerful than your cell phone. If there are current indications that they were over rated by legitimate miscalculations then let's have them retested and rerated a year from now, just as with any other new technology, let's not jump back in time and penalize those very people who are doing their best to bring new technology to the

people. Don't take the "wind out of our sail", cause unemployment of our trained installers and bankrupt multiple companies just as they are doing some great good for our neighbors.

The CaGreenTeam has invested everything in these products and will be bankrupt without the rebates already applied for in good faith and promised to consumers. We, as well as our customers, followed the rules as they were published. We have a warehouse full of products purchased by us and waiting for the rebate to be re-instated so we can put them in their new homes. We have done and paid for the engineering and permit work and have customers waiting. Most of them have borrowed money for a down payment as required by the current process, and have been making payments on that money while the program is shut down. Besides being unethical, it may even be illegal to change the rules retroactively. Let's not go down that road or jump to some radical decision. Why not look for better product testing that is the same standard for all small wind, allow probation periods for real life testing, provide rebates that continue to encourage innovation in the US once again to be the thing to do and move forward towards energy independence. If there are, as Mr Burgy stated in his comments to CEC, 114 CEC Listed Chinese wind products that "just don't work", how about testing them with the same standard as everybody in the wind industry? If they don't perform, place them on probationary status with a realistic time frame to remedy their performance.

The following are major topics I would like to address at the CEC meeting on Wednesday 8/3/2011

- \*Restraint of trade
- \*Loss of revenue for CaGreenteam
- \*Loss of employment in California
- \*Damage to the wind industry/CaGreenTeam/Dyocore reputation
- \*Damage to the product names we sell and install
- \*Damage to current and potential client's belief in wind power and CaGreenteam
- \*Loss of trained employee's since we can't keep them working. We will have to hire and train new employee's at additional costs

Respectfully,

Ray Walp - CEO

CaGreenTeam