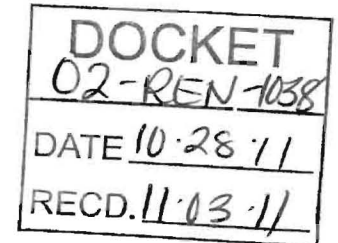




Small Wind Certification Council
56 Clifton Country Road, Suite 202
Clifton Park, NY 12065
info@smallwindcertification.org

October 28, 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: SWCC Comments on Revisions to Emerging Renewables Program Guidebook

Dear Commissioners,

This letter encompasses comments from the Small Wind Certification Council (SWCC) concerning the November 2011 *Emerging Renewables Program Guidebook, Eleventh Edition*, including recommendations for incentive eligibility.

SWCC applauds the CEC in establishing strong, immediate requirements for small wind turbines to be certified by SWCC or a Nationally Recognized Testing Laboratory (NRTL) in order to receive ERP funding, and in affirming the Energy Commission's right to deny eligibility due to poor performance, concerns about equipment design or safety, concerns about the quality of data presented for purposes of equipment listing, or lack of manufacturer support for equipment maintenance and warranties.

These important changes will promote confidence that small wind turbines installed under the ERP have been tested for safety, function, performance and durability, and will ensure consistency in ratings.

However, to ensure timely progress of all eligible wind turbines to full certification, we reiterate our recommendation to accelerate the requirement for full certification, so any turbine model that has not submitted a complete certification by SWCC or a NRTL satisfying the AWEA 9.1-2009 or IEC 61400-2 standard within 9 months from the date the Guidebook is adopted will be removed from the list of eligible equipment.

In addition to the requirements established by Wisconsin's Focus on Energy and the Energy Trust of Oregon for independent certification for small wind turbines to qualify for incentives beginning January 1, 2012, the New York State Energy Research & Development Authority has recently announced it will require full certification to the AWEA 9.1 standard as of September 30, 2012, for all small wind turbines to remain eligible for funding. As explained in our previous comments, a grace period of 9 months is ample for converting power performance certifications to full certification status.

We would also like to clarify that in order for SWCC to confirm certified power curves for turbine models that have achieved SWCC "Conditional Temporary Certification" based on testing and analysis pursuant to the IEC 61400 Standards or the BWEA Standard, including those certified under the UK's Microgeneration Certification Scheme, those turbine models would also need to achieve SWCC "Limited Power Performance Certification."

The link between the small wind market and state and utility incentives and rebates is more apparent than ever, and SWCC appreciates the Commission's recognition of the urgency of requiring certification to safety and performance standards.

Please feel free to contact us with any questions or for further information. We are happy to continue working with CEC staff to ensure that certification requirements for the ERP are appropriate, independent and rigorous and to aid the timely relaunch of the program. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent Summerville", with a stylized flourish at the end.

Brent Summerville
Technical Director