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The NYSERDA RGGI concept paper is consistent with IBM's belief in applying technology toward achieving a sustainable planet. We offer the following additional comments and suggestions for your consideration: 1) Incentives to spur investment in new or retrofitted facilities for the manufacture of renewable energy products such as solar-to-electric technology. 2) Research activity aimed at reducing the cost of manufacture as well as improving operating efficiency of solar photovoltaic technology. 3) Research activity to define improved standards of performance and reliability of solar photovoltaic products, particularly as applied in Northeastern US climates. 4) Development and implementation of Smart Grid technology to pilot regions (specific utilities) in New York State, interlocking energy generation optimization with end-user conservation and meter usage decisions. 5) Development and implementation of Smart Transportation technology in pilot cities, such as Albany, to minimize traffic congestion, pollution, and conserve fuel. A successful NYS-based pilot may provide the right environment and learning for rolling out to larger municipalities, such as the borough of Manhattan. 6) IBM supports the concept of creating a Solar Photovoltaic Research and Development Center within NYS. Ideally this would consist of a partnership between industry, academia, and the state. Two models may be considered, and both may occur in parallel. The first model would be similar to the Semiconductor Research Corporation (SRC), in which member companies' fees are used to support basic, pre-competitive research at academic institutions. Because of the nature of the Solar PV industry, government funds would need to provide the bulk of funding in the first few years, just as SRC was launched almost solely with federal funds many years back. The second model would be similar to the advanced semiconductor development partnership IBM has with SUNY Albany, in which IBM brings in development partners to work at a state-owned and academically oriented facility to advance the state of the art and generate a mixture of public and proprietary IP. The latter should help spawn a solar energy technology ecosystem in NYS.