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Submitted electronically via: rggiprograms@nyserda.ny.gov

Re: New York's Regional Greenhouse Gas Initiative Operating Plan Amendment for 2014

Conserval Systems Inc. respectfully submits these comments to the May 2nd draft of New York's RGGI Operating Plan Amendment for 2014.

Our company, Conserval Systems Inc, is a New York State based company that invented and commercialized *solar air heating* around the world. Known as **SolarWall®**, our technology offsets the huge amount of energy used to heat & ventilate large commercial and industrial buildings. The SolarWall® technology has been honored alongside Thomas Edison, Henry Ford, George Westinghouse, Willis Carrier, the steam engine and the Panama Canal by the American Society of Mechanical Engineers (ASME) in a brand new exhibit in NYC that features the best inventions, inventors and engineering feats of the past two centuries. (The other inventions recognized in the "Energy & Power" category are the Steam Engine, the Jet Engine, the Transformer, Incandescent Light Bulbs, the Internal Combustion Engine, Alta Wind Energy Center, the Electric Generator, and the Itaipu Dam.)

http://solarwall.com/posts/solarwallr-honored-along-with-edison-ford-and-the-panama-canal-in-american-society-of-mechanical-engineers-exhibit-230.php

New York is currently home to several large SolarWall projects totaling around **240,000 ft^2 of collector area** producing almost 20 **MW of thermal energy** (**~4500 tons of CO2 displacement / year**). For example, there are over 130,000 ft^2 of SolarWall systems installed at Fort Drum. Other large projects include Griffiss Airport & Plattsburg Airport (a project funded by NYSERDA) & Stewart National Guard. These projects are indicative of the large-scale potential in the commercial/industrial space.

SolarWall air heating systems have been independently proven to reduce up to 50% of the fuel used to heat an industrial building. They are in use by clients on 6-continents and 38-countries for ventilation or process heat applications. They are low cost, maintenance free and last 30+ years. Furthermore, they have up to 80% solar conversion efficiency.

We are pleased to see increased interest in Solar Thermal technologies but unfortunately Solar Thermal-Air heating technologies are not eligible for the Solar Thermal program, despite the fact that space heating is often the largest single usage of building energy in NY State, typically representing up to 50%+ percent of the total energy used by buildings.

Solar air heating technologies offer substantial environmental benefits and need to be incorporated into fuel-neutral Solar Thermal programming in NY State. This is necessary to properly address the large use of conventional energy – and corresponding CO2 emissions – generated via space & ventilation heating in the commercial, industrial and agricultural sector.

Since electricity measures are funded by New York's Renewable Portfolio Standard, Energy Efficiency Portfolio Standard, and Systems Benefit Charge, we believe and strongly advocate that the majority – if not all – of RGGI's funding should go toward reducing carbon emission via deployment of Solar Air & Water Heating Systems. That said, the $963,779 proposed in the current draft budget allocations is too small to significantly impact the market in a lasting positive and productive manner. We believe the Commission should consider a much larger investment in order to develop New York's Solar Thermal market into a leader across the US.

Thank you for the opportunity to comment. We look forward to continuing to participate in the RGGI Stakeholder process.

Respectfully Submitted,

Sincerely,

Victoria Hollick

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Victoria Hollick, President Conserval Systems Inc. -