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New York State Energy Research and Development Authority (NYSERDA)
RGGI Programs
17 Columbia Circle
Albany, New York 12203-6399

TSEC applauds New York State for your groundbreaking Regional Greenhouse Gas Initiative (RGGI), the United State's first carbon cap and trade system.

We are also very pleased with your outstanding work in preparing the February 25, 2009 Draft "Operating Plan for Investments in New York under the CO2 Budget Trading Program and the CO2 Allowance Auction Program" - and especially excited to see solar thermal technologies included in the draft plan, with \$7.5 million proposed for residential solar hot water programs; solar air pre-heating included in millions of dollars of commercial programs; and a specific goal of training 700 solar thermal technicians.

There are thousands of Solar Air Heating systems installed in over a thousand facilities worldwide - but virtually no one in the state knows that the largest solar heating system in North America (4 MWs of solar thermal) is installed in Fort Drum, where 100,000 square feet of Solar Air Heating systems annually eliminates 2,000 tons of carbon per year by reducing natural gas burned for heating. Nor that a similar Solar Air Heating system at the Rockland County Co-Compost facility is saving ~14,100 gallons of oil per year.

Currently, over 3 dozen NYS municipalities, authorities, agencies, businesses and colleges are evaluating solar air heating projects; and New York Solar Hot Water sales of ~500 per year is about the same as the PV program - without the state incentives.

While the RGGI goal of 1,833 new solar thermal systems is ground-breaking and laudable, we believe that New York State should and aim for much higher goal of at least 10,000 installations per year by 2011, including a minimum of 20 MWs of Solar Heated Air systems.

To achieve this goal, there are 3 changes that we recommend to the Draft Operating Plan:

1. Provide \$3 million a year for a 3 year statewide "Wake up to Solar" Campaign - instead of only providing incentives. The Campaign would involve all stakeholders in preparing a central message; give the public access to solar thermal information from a central website, toll-free number, and common print materials; and publicize the ground breaking purchases of first adopters, so that others may feel comfortable adopting the technology as well. The Campaign is modeled on European campaigns that increased the number of solar thermal systems from 500 units per year to 10-20,000+ in 3 to five years.

2. Increase Solar Thermal funding. The draft Operations Plan recognizes that Solar Thermal provides the same carbon reduction as PV - at one-third the cost (\$81 per ton). Solar heated air is even more cost effective.

Yet, the Operations Plan calls for only 7.5 million for solar thermal (1/4 of the \$32 million proposed to be spent on PV). The effective promotion and adoption of solar thermal will lead to a broader public acceptance of all solar technologies, including PV.

3. Supplement the PUBLIC TRAINING PROGRAMS (NYSERDA, vocational and community college training) with PRIVATE CERTIFICATIONS by Solar Thermal Manufacturers. Manufacturer trained installers should be allowed to participate in the statewide incentive and marketing campaign - and be held accountable by providing a 5 year manufacturer system warranty, and being ranked by customers on a central statewide internet service.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael DiTullo", is written over a horizontal line.

Michael DiTullo
The Solar Energy Consortium, Managing Director of Business Attraction & Government Relations