



To: Chris Kelley, Office of Tax Legislative Counsel, U.S. Treasury
José Zayas, Director, Wind & Water Power Technologies Office, U.S. Department of Energy

Date: May 30, 2014

Re: Update of DWEA Recommended Wind Turbine Certification Criteria

From: Heather Rhoads-Weaver, DWEA Secretary on behalf of DWEA Executive Committee

Thanks again for your efforts to promote quality assurance for public investments in distributed wind turbines, a critical and timely issue for ensuring the health of the distributed wind market.

Based on further discussions with staff at the Wind & Water Power Technologies Office, technical experts and affected parties, DWEA has updated our recommendations for certification requirement language at the national, state and local levels as shown on the attached. This position statement reflects substantial stakeholder review and debate, and has been approved by DWEA's Executive Committee.

DWEA requests your support to keep pushing forward as quickly as possible toward requiring robust certification for eligibility for the federal ITC and other taxpayer funds.

Rationales behind several recent clarifications include:

- What constitutes accreditation for organizations providing certifications is specified to clarify that self-certification does not meet the intended threshold.
- Public release of certification summary reports and government-issued listings with ratings of wind turbines in compliance with the criteria along with status of designs under evaluation is critical to help protect consumers from false claims and for consumer comparison of test results.
- DWEA supports moving away from allowing fleet hours to substitute for a full Design Evaluation, with a short notification period to ensure such a requirement does not disrupt expected 2014 sales.
- Additional minor edits reflect improvements suggested by technical reviewers.

We look forward to discussing these recommendations and urge your offices to continue prioritizing rapid establishment of explicit certification regulations for distributed wind funding.



DWEA Position Statement: Recommended Certification Criteria

May 30, 2014

DWEA recommends that funding assistance be provided and permits be issued only to the highest quality distributed wind turbines, namely those that demonstrate compliance with national and international standards according to the following criteria.

DWEA urges for these certification requirements to be enacted immediately, with documentation of compliance provided no later than April 15, 2015.

In order to be designated as eligible:

1. Distributed wind turbines with rotor swept areas of up to 200 m² shall carry and publicly release certificates and certification summary reports conforming to the *AWEA Small Wind Turbine Performance and Safety Standard* (AWEA Standard 9.1-2009 or future version), issued by an organization accredited to ISO/IEC 17065 with a scope that includes AWEA Standard 9.1-2009.
2. Distributed wind turbines with rotor swept areas greater than 200 m² shall carry and publicly release:
 - 2.1 Up-to-date test summary reports conforming to IEC 61400-12-1 (2005 or future versions) and IEC 61400-11 (2006 or future versions), with conformity of the testing assessed by an organization accredited to ISO/IEC 17065 with a scope that includes the specified IEC Standards; and
 - 2.2 A Design Evaluation Conformity Statement attesting compliance with IEC 61400-1 (2005 or future version), issued by an organization accredited to ISO/IEC 17065 with a scope that includes the specified IEC Standard.

DWEA also recommends that a federal government web listing be maintained with power, energy, and sound ratings of wind turbine designs that are in compliance with these criteria, along with a status listing tracking the progress of designs under evaluation.