

Exhibit Number: 3

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EXHIBIT 3
DATE 1-19-05
HB 14B121

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

**Standardizing Generator Interconnection
Agreements and Procedures**

Docket No. RM02-1-000

COMMENTS ON THE INTERCONNECTION NOPR

Submitted by BERGEY WINDPOWER CO.

June 17, 2002

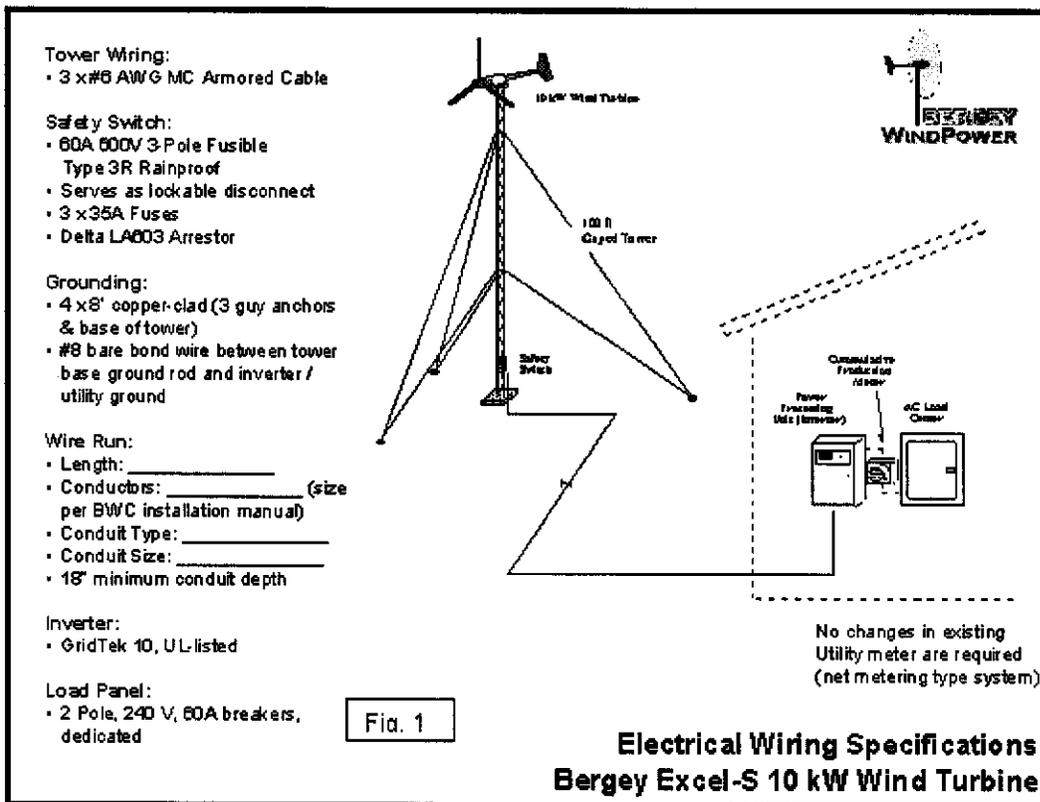
Background

Bergey Windpower Co. (Norman, Oklahoma) manufactures and sells small wind energy systems from 1 kW to 10 kW for both on-grid and off-grid applications. We have been in business for 25 years, have ~ 2,500 installed systems covering all 50 States, and we are the world's leading supplier of residential wind energy systems. Homeowners, farmers, and small businesses install our small wind systems to reduce their utility bills. Our first grid-intertied system was installed in 1980. I serve as chair of the Small Wind Turbine Committee of the American Wind Energy Association (AWEA) and have twice served as president of AWEA.

Bergey Windpower now has grid-intertie systems on over 150 investor-owned utilities, rural electric cooperatives, and municipal electric systems. We estimate that our wind systems have accumulated over 400 million hours of interconnected operation. Quite often our customers have had the very first customer-sided generator installed on a utility. As a result we have many, many times had to guide inexperienced utilities and inexperienced customers through the process of establishing a mutually acceptable interconnection agreement, with the associated technical and contractual requirements.

Sometimes this has gone smoothly and efficiently and other times the utility approval process has dragged on for months and consumed more labor hours than were required to manufacture and install the wind system.

Our wind systems operate at variable speed so we use power electronics (inverters) to connect to the grid. As shown in Figure 1, our system installations include a wind turbine, an accessible disconnect switch, an inverter, and a dedicated breaker in the customers circuit breaker panel (load center). The inverters include all of the wind system and utility protection functions, so additional protection equipment is not required.



Introduction

Bergey Windpower supports the February 1, 2002 Small Generator & Public Interest Groups' comments on the ANOPR and the Joint Commenters / Multiple Public Interest Organizations filing today in response to the current NOPR. We also support the NOPR comments and recommendations filed today by the Solar Energy Industries Association, the U.S. Fuel Cell Council, and the American Solar Energy Society and we recommend Commission adoption, following a technical conference to resolve certain issues, of the IPs and IAs proposed in their submission. We share the Joint Commenters concerns that the proposed interconnection rule fails to provide appropriate standard interconnection procedures and agreements for smaller, customer-owned generating units, and we urge Commission adoption of the small generation IPs and IAs in the Final Rule issued in this proceeding.

In addition, we are taking this opportunity to make a few points on interconnection issues stemming from our experience on the "front line" over the last two decades.

Additional Comments

1. Small wind systems, along with other distributed generation technologies, have significant potential to contribute to our national electricity supply portfolio and FERC efforts to streamline their use will lead to greater competition in the marketplace.

Our industry and the US-DOE have just completed a roadmap for small wind turbine technology through 2020. In that study the potential was estimated at 140,000 MW, including over 15 million homes. The industry has set a goal of 50,000 MW by 2020, which would contribute approximately 3% of total electricity sales or approximately 6% of total residential electricity. We see advanced, stealthy small wind systems as a “new age appliance” which has explosive sales growth potential given the right market conditions.

Making interconnection of small customer-owned generation systems a quick, painless, and inexpensive process serves to promote competition in marketplaces where there is a shortage of competition. Consumers need more choices for electricity supply and utilities need to feel more of the hot breath of competition on the necks. The Texas deliberative polling experience shows that there is a substantial pent-up demand for clean energy alternatives and that a significant majority of ratepayers are willing to pay more for it. Our experience, nation-wide, is that homeowners, farmers, and small businesses are intrigued by the prospects of being able to “spin their meter backward” and they dream of the day they can take control of their own electricity supply destiny.

The electricity supply marketplace discriminates against higher-cost, but more price-stable renewable resources because utility management and shareholders are insulated from fuel cost risks by the ubiquitous “fuel adjustment charge”. Consumers, on the other hand, can and do get hammered by price spikes. Distributed generation systems using wind and solar energy provide an alternative. Brent Alderfer, a past Commissioner of the Colorado PUC, has also made the point that for load centers that are effectively