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November 6, 2013

Honorable Kathleen H. Burgess  
Secretary  
Three Empire Plaza  
Albany, NY 12223-1350

Submitted electronically via [secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

**RE: Case 03-E-0188, NYSERDA CST Program Market Evaluation Report**

Dear Secretary Burgess:

Our company, Conserval Systems Inc, is a New York based company that helped to invent and commercialize *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. New York is currently home to several large SolarWall projects totaling around **240,000 ft<sup>2</sup> of collector area** producing almost **20 MW of thermal energy (~4500 tons of CO<sub>2</sub> displacement / year)**. For example, there are over 130,000 ft<sup>2</sup> 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

We are particularly interested in the New York Solar Thermal (ST) program that NYSERDA runs, as part of the Renewable Portfolio Standard (RPS) Customer-Sited Tier (CST) program. Our company sees great growth potential in solar heating, as it addresses the largest use of building energy in the state, and we would like to add our support for NYSERDA's recommended program amendments. NYSERDA's proposed amendments are essential for this program to succeed and for my company, and companies like mine, to:

- a) Create jobs and hire New Yorkers
- b) Provide our SolarWall® technology to a variety of commercial, industrial and municipal clients to help them achieve their environmental objectives
- c) Scale my company to prepare for future growth

Again, we support the program amendments NYSERDA has recommended and additionally we propose some additional changes, including:

**1. Our company supports the proposed change for fuel neutrality within the NYSERDA solar thermal program.**

The lack of participation in the solar thermal program shows that there is a current mismatch between the intent of the policy – to create a sustainable market for SHC systems in NY- and the result of the policy. The existing program only targets domestic water heating systems that displace electricity, however heating in NY State is a *combination of both space and water heating* primarily fuelled by natural gas, heating oil, and propane. With the appropriate program structure the industry will scale as private capital will enter the market to providing third party financing and other solutions.

**2. Our company supports the proposed change of an increased commercial project cap to \$100,000.**

Most commercial and industrial solar heating systems require a cap that is higher than \$25,000. In order for the market to scale and for larger projects to be realized, a minimum cap of \$100,000 is required. Increasing the per project cap will also attract private capital into the market and allow for third party system financing

**3. Our company strongly recommends that solar air heating technologies be incorporated into the program or a solar air heating program should be developed.**

In order to properly address the large use of energy required for space & ventilation heating in the commercial and industrial sector , solar air heating technologies, like SolarWall®, need to become an eligible technology. Solar air heating systems use solar energy to heat indoor spaces in commercial applications, as well as to heat air for manufacturing processes and agricultural crop drying applications. Solar air heating systems also address the largest usage of energy in a building– the ventilation, process, and indoor heating – representing a tremendous opportunity in NY for widespread deployment across the entire building sector.

Sincerely,

A handwritten signature in black ink that reads "Victoria Hollick". The signature is written in a cursive, flowing style.

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Victoria Hollick, President Conserval Systems Inc.