

Ownership Matters:



Community-Based Wind Development in Colorado





Keynote speaker Dale Osborn talks with participants at a community wind seminar in Lamar.

This handbook grew out of workshops held in May 2008 titled: Ownership Matters: Community-Based Wind Development in Colorado.

Sponsored by the Governor's Energy Office, Colorado Harvesting Energy Network, Rocky Mountain Farmers Union and the U.S. Department of Energy, the workshops brought national and state experts in community wind to spend a day educating participants in Lamar and again in Wray.

Much of the information contained in this handbook is based on information presented at the workshop and we thank the presenters for sharing their knowledge. Presentations from the workshop are available at the Colorado Harvesting Energy Network website: <http://www.harvestenergy.org/colorado/index.html>

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Introduction

Colorado is at an exciting turning point in the development of its energy resources. While home to traditional energy sources, the state is now recognized as a leader in the “New Energy Economy” focusing on clean, renewable resources, thanks to the leadership of Gov. Bill Ritter, the Colorado General Assembly, the Colorado Public Utilities Commission and the Governor’s Energy Office.

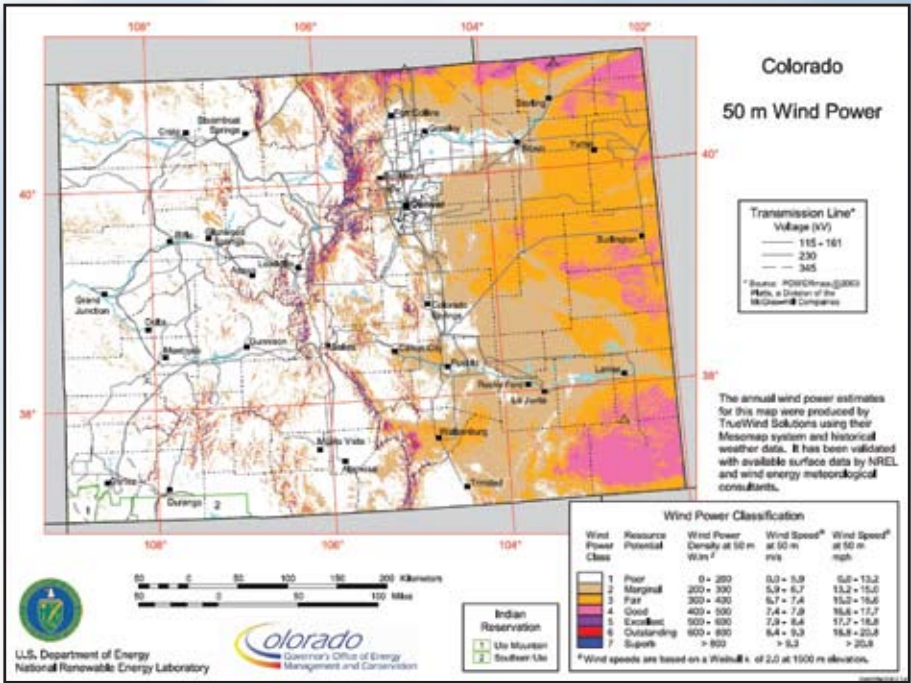
State leaders want to ensure that all parts of our state benefit from the exciting opportunities to develop Colorado’s wind, solar, geothermal, hydro-electric and biomass resources.

Our leaders also want to make sure that communities, including economically challenged rural communities, have a chance to benefit from the New Energy Economy. The legislature has established incentives for community-based development of renewable resources in order to keep energy dollars circulating in local economies. New state policies that aim to steer more energy development towards community projects increase the opportunities for local project developers. Community-based wind energy projects have strong potential in Colorado to provide renewable power.

Wind turbines are a mature technology that can compete favorably with other sources of electricity in many markets. One of the strengths of the technology is that the cost is all up front. After the initial capital investment, the wind continues to blow for free and the equipment will keep running for many years if properly maintained. In an era when fuel costs are rising dramatically and future potential carbon taxes are increasingly likely, wind’s virtually guaranteed price makes it an attractive investment.

Recent studies suggest that wind power has the potential to play a far bigger role in our nation’s energy future. A U.S. Department of Energy Report in May 2008 estimated that wind energy could contribute 20 percent of the U.S. electricity supply by 2030. That would require new turbines capable of generating 16,000 megawatts every year by 2018 and in subsequent years. To reach the goal would take more than three times as many turbines as were installed in 2007. And the 5,249 MW of turbines installed in 2007 broke all previous growth records and represented a 45 percent one year increase.

Colorado, which ranks sixth in the nation in installed wind generation, faces increased power demand in the future. The Colorado Energy Forum forecast that Colorado will need nearly 5,000 MW of new generation or conservation by 2025. Wind could contribute a major portion of that electricity.



Community Wind Development in Colorado: How to get started

A new icon is rising in Colorado beside the Rocky Mountains: tall, graceful wind turbines that spin clean power using the abundant wind on the eastern plains.

Wind power has a bright future in Colorado for many reasons.

- The state has a world-class wind resource in many of its rural areas, with parts of southeastern Colorado rated among the nation's top five wind areas.
- Wind projects bring valuable economic development to hard-pressed rural areas, adding taxes that support schools, roads and community projects.
- And urban marketplaces are ready for the clean electricity that wind power provides as we realize the importance of developing alternatives to fossil fuels for environmental, economic and national security reasons.

Most of the wind projects developed so far in Colorado are owned by large corporations which have the ability to use tax credits and the economies of scale to make purchasing and installing the turbines profitable. But this guide is oriented towards another type of project called community wind which includes local

owners. Community wind projects are generally of commercial scale, and the term often refers to projects between 1 megawatt and 30 megawatts of capacity.

To bring a community project to fruition, a broad range of community leaders need to get involved: county commissioners, landowners, , community banks, local investors, entrepreneurs and electric service providers. Their mission is to figure out how to maximize the value of their wind resource for the benefit of their community, and then work to overcome barriers to success.

We hope to help local decision makers start down that path by answering five basic questions:

- 1. What is community wind?**
- 2. Is my site suitable for development?**
- 3. What are the options available to landowners?**
- 4. What are the key steps to a successful project?**
- 5. How do I secure a power purchase agreement for my project?**

At the end of this booklet, resources are listed that provide greater detail on all these topics.



1. WHAT IS COMMUNITY WIND AND WHY IS IT IMPORTANT?

Community wind projects are locally owned by farmers, investors, businesses, schools, utilities, or other public or private groups. These projects can bring added financial benefit to their communities because members of the community have a significant, direct financial stake in the project beyond land lease payments and tax revenue.

The U.S. General Accounting Office reported that owning the wind turbine can double or triple the income

to landowners, compared to just receiving lease payments. Iowa consultant Tom Wind found that locally-owned wind generation creates about 10 times the local economic benefit as projects owned by entities from outside the area. Other studies have also found major economic benefits to local ownership of wind projects.

Community wind projects are generally of commercial scale and may include one or more turbines. The term often refers to projects between 1 megawatt and 30 megawatts of capacity.

Gov. Bill Ritter and the Colorado legislature have encouraged local ownership of renewable energy production, including wind projects, in recent years. Under Colorado law, "It is the policy of this state to encourage local ownership of renewable energy generation facilities to improve the financial stability of rural communities."



Many rural areas of Colorado need an economic boost.

2. IS MY SITE SUITABLE FOR WIND DEVELOPMENT?

The quality of your wind resource and access to transmission lines are critical factors in determining whether your site is suitable for wind development. If your site has quality wind but, as with many areas, lacks access to transmission, then you need to track current plans for transmission expansion and upgrades.

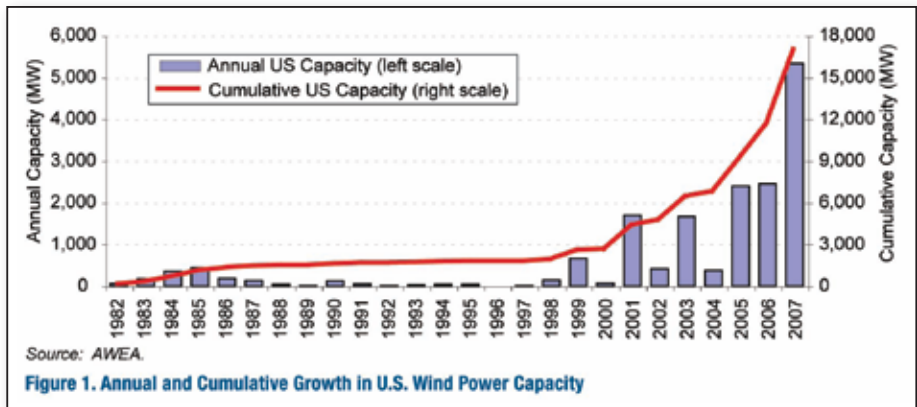
WIND QUALITY

The quality of your wind resource will determine the potential economic value of your site for power generation. Seemingly small differences in wind speed will translate into major changes in output from your wind turbines. Thus, when a utility is evaluating multiple projects from which to select winning bids, economics will tend to favor the project with the best wind resource.

To generate commercial wind power, you need an average annual wind speed of 15 to 18 miles an hour. The steadiness is as important as the speed. A great deal of meteorological data already exists. The National Renewable Energy Laboratory (NREL) has produced maps showing wind resources and ranking them by classes, covering the entire United States. These maps identify excellent wind resources in much of eastern Colorado. But accurate data specific to your site is imperative before project development can proceed. At least one year of wind data specific to your site is required for calculating how much energy your project can generate. The quality of your data is critical to the evaluation of your project by investors, vendors, and utilities.

To measure the wind on your site, you will need an anemometer. These are wind-speed/direction measuring devices that collect specific wind data from a site over a period of time. Mounting the measuring device at the same height as the planned wind turbine and collecting data over time is the best way to determine if the site has adequate wind power- enough of the time- to make a wind turbine practical. Companies that specialize in providing wind studies of specific sites can help you determine what you need. You may want to take advantage of the free Colorado anemometer loan program being administered by Colorado State University. Site specific wind data can also be secured from companies that use sophisticated computer models with historic meteorological data.





TRANSMISSION ACCESS

Wind developers are continuously looking for “sweet spots” that have both excellent wind and access to transmission that can accommodate additional power flows. The fact that most windy sites do not have adequate existing transmission creates a major bottleneck to increasing the installed wind energy. Transmission is the “farm to market” highway for electricity, the high voltage lines that form the backbone of the electrical system.

Constrained and limited transmission lines have been a key limiting factor in getting wind power from Colorado areas with the greatest resource, the Eastern Plains, to the areas with market demand: the populous Front Range. Tri-State Generation and Transmission Association, for example, recently reported that it has 42 proposed projects seeking transmission access.

Colorado lawmakers passed SB 100 in 2007, requiring Xcel Energy to designate energy resource zones, develop detailed transmission plans serving each zone, and consider local ownership of renewable energy facilities in the zones. The law also will allow Xcel to recover costs of new transmission from its ratepayers before the renewable energy at the other end is up and running.

Utility, governmental, and private interests from Wyoming, Colorado, and New Mexico are making plans to export wind energy to Arizona along a high-voltage system called the High Plains Express Transmission Project. The project is based on the view that if wind development potential in Colorado and other windy areas is to be met, there needs to be a way to move it to large markets in other states.

While transmission planning is ramping up, it will take years before major new lines are built. That is one reason that community wind projects might look first at selling their power to a local buyer such as a municipal utility or rural electric association. In many parts of the state, the distribution network can absorb

new supplies. Only now are these public power utilities gearing up to purchase renewable generation, largely due to 2007 legislation requiring 10 percent of their power to come from renewable resources.

3. WHAT ARE THE OPTIONS AVAILABLE TO LANDOWNERS?

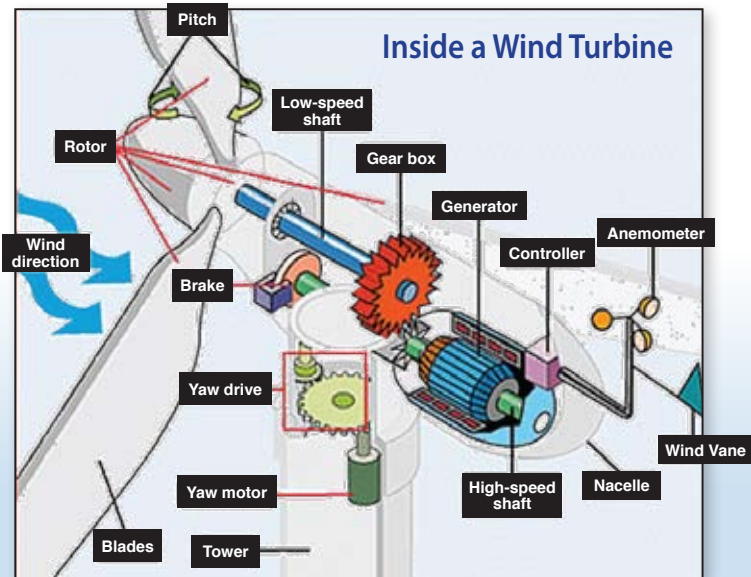
Before making any legal or financial commitment for wind development, landowners need to understand the strategic options available. These options include outright leasing of “wind rights” to a wind developer, forming a landowner association with your neighbors to arrive at the best deal from among several developers, or pursuing local ownership of a wind farm. Each option is quite different in terms of time, complexity, return on investment and risk.

Leasing your land to a developer

Wind developers or their representatives are active in much of the rich wind resource areas of Colorado. If you are approached about leasing your wind rights, it’s a good idea to study your options. Consult an attorney and perhaps contact an organization such as the Rocky Mountain Farmers Union which can provide good advice on issues to consider.

Landowner Associations

One model that has been pioneered in Wyoming may offer helpful guidance to interested Colorado land owners. Farmers and ranchers near Slater, Wyoming, were approached by multiple wind developers offering to lease their land. Some worried



that the developers were trying to set neighbor against neighbor and get land as cheaply as possible. The land owners decided to work together and from that effort grew the Slater Wind Energy Association, LLC, which represents the interests of 45 landowners controlling 28,000 acres of land. They agreed that all landowners—whether they host a wind turbine or not—would benefit from wind development in their community. The association issued a request for proposals from wind developers and eight submitted proposals. From those, the Slater group selected the developer its members decided would provide the best deal for their area.

Similar LLCs have been organized elsewhere in the “Wind Corridor” that stretches from eastern Wyoming into eastern Colorado.

Co-development

Community wind projects can be successfully developed in conjunction with larger corporate projects. In

Colorado, for example, the state’s first major wind farm near Lamar was built with a community project that “piggybacked” on the Colorado Green project. The municipal utilities of Lamar and Springfield, along with their wholesale supplier, the Arkansas River Power Authority, were interested in taking advantage of their excellent wind resource but the local leaders doubt they alone would have had the technical expertise and financial muscle to get it built without the big Colorado Green project nearby. As it was, the public power agencies were able to acquire and bring online five turbines, each 1.5 MW in capacity, to supply a portion of their power and benefit their towns. The presence of the larger project encouraged the turbine maker and project developer to sell the equipment and agree to maintain it, key ingredients in a successful wind project.

Co-Development of community and corporate wind projects also helps create economies of scale in the costs of installing the huge turbines which require renting enormous cranes, and in the costs of electrical infrastructure required to add the new power to the grid.

Discussion of co-development opportunities should occur with developers of large projects soon after they enter a local community and begin dialog with community leaders. County commissioners can play a critical role in seeking co-development as these large developments begin the permitting process.

A cooperative model

The Colorado Harvesting Energy Network, (CHEN), an association of rural



Colorado Agriculture Commissioner John Stulp was involved with the Lamar wind project.

interests seeking opportunities to maximize rural benefits from the New Energy Economy, is exploring a slightly different model. CHEN partners are investigating the formation of a Clean Energy Cooperative. Such a legal entity could establish mechanisms to connect multiple community-based projects with wholesale buyers to facilitate their development. The ability to aggregate small projects so that utility buyers wouldn't need to negotiate individual deals with each one could be a benefit of the cooperative. So could a shared pooling of resources to provide legal, communications, marketing, negotiations, interconnection and other services to the community projects.

4. WHAT ARE THE KEY STEPS TO A SUCCESSFUL PROJECT

GETTING ORGANIZED

Successful community wind projects generally require community leaders to get involved. Local bankers, elected officials, farm organization leaders and others are important players to communicate with early on. A number of farmer-led groups in Colorado have been working for years to develop community wind projects and their leaders may be willing to share their expertise. The more the project is truly a reflection of your community's desires, the more likely you are to be able to overcome the barriers between you and success.

Early investors may become the core group making decisions. As your group gets organized, consider setting goals through a participatory process and decide what you want to accomplish. Consider developing your goals into a work plan and determine your initial budget. Part of your planning will need to include fundraising; for example, you may want to apply for a USDA grant or seek other feasibility study funding from other sources.

As you proceed, you may want to hire an experienced consultant to guide you through succeeding steps of the project development process.



PROJECT DEVELOPMENT



Tony Frank of the Rocky Mountain Farmers Union talks with Kay Lynn Hefley of Baca Green Energy in Lamar.

Resources listed at the back of this handbook can help you find the experts you may need for each of these steps.

Business Plan: The business plan is a road map identifying points along the project development path that will lead to success. Typically, the plan will include a financial model indicating projected cash flow during the contractual life of the project, typically twenty years. As project development

progresses, the model will be adjusted to reflect a more accurate picture of financial performance. Your business plan becomes a vital tool for project-related communication.

One of the key reasons wind power has taken off in the U.S. in the past 15 years is the federal Production Tax Credit. Created by a federal energy law in 1992, it provides an income tax credit of 2 cents per kilowatt hour of electricity produced by qualified wind energy facilities.

The credit provides a strong incentive for large developers that need the tax credit— and is a major reason why a handful of large utilities and other corporations own most of the wind power being generated in the U.S. Only about 200 entities in the U.S. have the ability to fully utilize the production tax credit.

The credit offers no benefits for tax-exempt entities such as municipal utilities or rural electric associations, and is not transferable. Thus, a tax investor needs to be in the ownership structure of a wind project for the benefits to accrue. The tax credit has enormous financial power in wind energy transactions and has led many experts to suggest that community groups find ways to partner with developers who can use the tax credit.

Another key part of the economics of some wind projects is an opportunity to sell the Renewable Energy Credits, or the benefits of avoiding greenhouse gas emissions by building a wind farm instead of a coal-fired power plant, for



Developer Dale Osborn and Attorney Brad Haight talk about community wind in Wray.

example. While Xcel Energy generally offers a bundled price for power and the credits, there is an opportunity in some projects – such as the new Wray school turbine—to sell RECs separately.

Because the use of the Production Tax Credit is such an important part of wind project finance, a “flip” structure of ownership allows an investor who can take advantage of the credit to be primary owner at the beginning of the project. Once the ten-year tax-credit period is over, ownership “flips” to a community developer. Typically, the tax-credit investor finances much of the project by both arranging debt and contributing equity.

Obtaining wind turbines: Unless co-development is anticipated, you should research wind turbines and their availability early in your planning.

The price and availability of wind turbines has been a major limiting factor for community wind projects in recent years. In the last five years, turbines have increased up to 100 percent in cost and have been all but unavailable except to the largest wind developers. With the huge surge in demand and supply that has not kept pace, wind turbines have occupied a sellers’ market.

Turbines have been getting bigger and bigger: whereas a decade ago a 550 kilowatt turbine was a typical commercial size, today’s turbines are often 1.6 megawatts each – or roughly three times as big and powerful. These have been too big, too expensive, and too difficult for most community wind developers to obtain. By mid-2008, costs had risen to more than \$2 million per installed megawatt of wind power.

However, there are signs that smaller, less expensive turbines will be growing more available soon. Some experts predict that a new generation of smaller, cheaper turbines ideal for community wind projects will start to become available by 2010. At roughly half the cost and half the size, such relatively simple pieces of equipment would be easier to acquire, install and operate.

Site Selection: The location of the wind turbines as they relate to the electricity grid and transmission lines, if needed, are key to the financial viability of a community wind project.

Landowner Agreements: Legally binding agreements fair to all the parties involved are a critical part of a successful community wind project.



Windustry founder Lisa Daniels, Mona Newton of the Energy Office and Attorney Brad Haight discuss community wind in Lamar.

Wind Assessment Quality: Detailed wind studies will be required to secure financing and demonstrate probable rates and time of generation. A variety of companies specialize in measuring wind resources.

Environmental Assessment: You will need to satisfy wildlife managers that your wind turbine will not interfere with endangered species or get in the way of bird migrations.

Interconnection Studies: The most important job of any utility is to provide reliable energy. Utilities thus need to maintain the integrity of their power supplies and must be very careful about interconnecting with new sources of electricity. Satisfying technical and procedural requirements needed to safely, reliably and efficiently interconnect with the electric grid will require professional assistance. Studies will determine interconnection costs that will be borne by the project developer including transmission and equipment upgrades, land rights of way, meters, and the like.

Permitting: Most counties have land use regulations that specify requirements for filing proposals and criteria for decision makers to judge whether or not a permit should be granted. You will need to check with your county planning office on the rules that apply to your wind project. It is very important to work with local elected officials and other permitting authorities early in the development process.

5. HOW DO I SECURE A POWER PURCHASE AGREEMENT FOR MY PROJECT?

Wind turbines produce electrical power that can be fed directly onto the electricity grid, but you need a utility committed to buying the power before proceeding.

Obtaining a firm commitment from a utility to buy your power – called a Power Purchase Agreement—is a key step to obtaining financing and turbines for a community wind project. Typically twenty years in duration, the agreement becomes an asset for which a wind project can obtain bank financing.

Most utilities in Colorado are now covered by requirements to acquire renewable energy and they see wind energy as an important part of their future. In addition, Colorado law specifically encourages “community-based development” of renewable energy.

The law says that each kilowatt hour generated from a new community-based renewable resource will be credited with 1.5 kilowatt hours toward the overall utility requirement. Community-based projects are defined both in state statute and Public Utilities Commission rules as projects “located in Colorado” and (a) owned by individual residents or local entities, (b) not larger than 30 megawatts, and (c) supported by the local governmental board.

There are very different methods by which utilities make decisions on power purchases. Following is a very brief overview of potential buyers of electricity produced by your community wind project and the policies they abide by.

Investor-owned utilities (Xcel Energy and Black Hills Energy) are subject to regulation by the Colorado PUC and its rules for acquiring new resources. The legislature has adopted statutes, and the three-member Public Utilities Commission has adopted conforming rules that encourage community-based development.

Regulatory innovation is providing much needed flexibility for smaller projects. Previous requirements were that all resources must be selected based only on the narrow assessment of least cost. The current PUC has defined cost and benefit in a broader way. Secondly, projects under 30 megawatts in size are not subject to competitive bidding. Community wind projects can enter into direct negotiations with the utility at any time whereas larger projects must respond to requests for proposals issued in accordance with the lengthy resource planning process.

Xcel Energy is seeking innovative business arrangements based on a desire to own a major portion of new resources. This suggests an opportunity to joint venture with Xcel Energy to develop projects. These innovations open the door for community wind developers to have a shot at winning a power purchase agreement from an investor-owned utility.



Tri-State Generation and Transmission Association, the wholesale power supplier to 44 rural electric cooperatives in four states, operates under different rules. Unlike investor-owned utilities, cooperatives are regulated by their member-owners through an elected board of directors. Cooperatives are also subject to policies contained in their “all-service agreement” with Tri-State. The agreement allows member coops to obtain up to 5 percent of their power locally which means small community projects could potentially find buyers at the local co-op level.

In 2007 the legislature required each Colorado cooperative to secure ten percent of its energy from renewable resources by the year 2020. Tri-State took the first step in helping its member cooperatives meet this requirement by issuing a request for proposals in January 2008 to supply up to 100 megawatts of renewable energy. Tri-State later launched a financial incentive program for member cooperatives to initiate projects within their own service territories. Tri-State’s local renewable project policy will make available performance payments to member coops to support a variety of community-based renewable energy projects. The payments will be based on each megawatt hour of energy production. Contact your co-op for more information.

Municipal Electric Utilities operate by yet another set of rules. Of the state’s 29 municipal utilities, 17 get their power from MEAN: the Municipal Electric Association of Nebraska. A handful of others get their power from other “joint action agencies” including Platte River Power Authority and Arkansas River Power Authority. The groups of utilities tend to purchase their power together. The largest municipal utility in the state, Colorado Springs Utilities, is a vertically-integrated full service utility similar to Xcel Energy. All of these public utilities have their own rules and policies regarding wind power purchases.

CONCLUSION

Despite a favorable policy climate, community wind projects have still faced financial, technical and procurement obstacles that have prevented wide-scale adoption of these renewable energy generators in Colorado. Many experts believe Colorado needs some additional policy changes, perhaps based on incentives such as other states have adopted, to improve the economics for community wind projects.

Despite the difficulty of making it through the complex process of community wind development, most observers believe that the climate will grow more and more favorable as policy makers feel increasing urgency about developing renewable energy. Wind offers virtually free electricity once the project is completed and can play a major role in our energy future.

Additional Resources

Community Wind: Important Terms and Frequently Asked Questions

What is Community Wind?

“Community wind projects are locally owned by farmers, investors, businesses, schools, utilities, or other public or private entities and they optimize local benefits. The key feature is that local community members have a significant, direct financial stake in the project beyond land lease payments and tax revenue.” – Windustry

A community wind project is generally a locally owned, commercial-scale wind project too large to qualify for net metering.

Benefits of Community Wind

- **Stimulates the local economy** by creating new jobs, new business opportunities, and bringing new investment to the community.
- **Strengthens rural communities** by broadening the tax base and generating new income for farmers.
- **Keeps energy investment dollars local.**
- **Ushers in more renewable energy** and support for wind by getting local people involved.

What are Megawatts (MW) and Kilowatts (KW)?

The power capacity of a large utility-scale wind turbine is generally measured in megawatts or MW. One MW of wind power capacity will provide enough energy for 250-300 homes on average each day.

The power capacity of a small wind turbine is measured in kilowatts or kW. A typical home will need a wind turbine with a capacity of 2-10 kW to meet its energy demands.

Energy from both large utility-scale and small wind turbines are measured in kilowatt hours or kWh.

Wind Resource Assessment

Wind resource maps are available for no cost at the U.S. Department of Energy website, www.windpoweringamerica.gov. Maps at this site will provide a rough estimate of the wind class or average annual wind speed for your site. The higher your wind class, the higher your annual wind speed. If your site is wind class 3 or higher then you should look further into your wind project. Additional steps will include site-specific meteorological studies to determine the economic feasibility of the project.

Production Tax Credit (PTC)

The Renewable Electricity Production Credit (PTC) is a per kilowatt-hour tax credit for electricity generated by qualified energy resources which includes wind energy. The production tax credit (PTC) provides a 2.0-cent per kilowatt-hour (kWh) benefit for the first ten years of a wind energy facility's operation.

Power Purchase Agreement (PPA)

A Power Purchase Agreement ("PPA") is a long-term agreement between the seller of wind energy and the purchaser. The length of a wind energy PPA is normally 20 years and the purchaser is a utility. The terms will express the amount of energy and the price the utility will purchase energy from the seller (e.g. 6 cents per kilowatt hour).

C-BED – Community-Based Energy Development

Community-Based Energy Development (C-BED) represents an initiative designed to optimize local, regional, and state economic development benefits from renewable energy, and to facilitate widespread development of community-based renewable energy projects. Key elements that define C-BED include:

- Local owners must benefit.
- No single owner may be allowed to own more than a specified percent of a project.
- Each C-BED project must have a local resolution of support.
- Partnerships and aggregation of projects are encouraged.
- Utilities are encouraged to look to C-BED sources of energy first.

Colorado's Renewable Energy Standard (RES), HB07-1281

In 2007 Colorado Governor Ritter signed HB07-1281 requiring investor owned utilities (e.g. Xcel Energy) to purchase 20% of their energy from renewable sources by 2020 and requiring rural electric associations to purchase 10% of their energy from renewable sources by 2020. Energy from locally owned, community-based renewable projects can be multiplied by 1.5 toward meeting the RES.



Where To Find More Information

The Colorado Harvesting Energy Network :

Follow links on this page to two important resources: <http://www.harvestenergy.org/colorado/index.html>

- **Power Point presentations** from the May workshops presented in Lamar and Wray on community wind
- **Colorado Community Wind Project Development Considerations**
A detailed paper sponsored by the Independent Bankers of Colorado Education Foundation, the Rocky Mountain Farmers Union and the Colorado Harvesting Energy Network written by Brad Haight of Hackstaff Gessler.

The Governor's Energy Office:

<http://www.colorado.gov/energy/>
Offers information on not only wind, but a full range of programs to advance the New Energy Economy

WINDUSTRY: A national non-profit leader in promoting community wind.

A community wind "toolbox" is available at this site: <http://www.windustry.org/communitywind>

The U.S. Department of Energy:

<http://www.windpoweringamerica.gov>
Offers a variety of resources to promote the expansion of wind energy.

Farmers Legal Action Group:

Follow this link to find a report on Community Wind incentives and other policies: <http://www.flaginc.org/>

Ontario Sustainable Energy Association:

This Canadian Province has one of the most supportive policies around for community wind:
<http://www.ontario-sea.org/>

Wind-Works

A resource of information about wind: <http://www.wind-works.org/>

American Wind Energy Association

The major national organization promoting wind power: www.awea.org/

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