

AMERICAN MUSHROOM INSTITUTE



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February 27, 2006

The Pennsylvania Public Utility Commission
Attn: Secretary
P.O. Box 3265
Harrisburg, PA 17105-3265

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Comments of the American Mushroom Institute

Regarding Docket No. L-00050174/M-00051865

Proposed Rulemaking Re: Net Metering for Customer-generators pursuant to Section 5 of the Alternative Energy Portfolio Standards Act, 73 P.S. § 1648.5

The American Mushroom Institute (AMI) is a national trade association that represents all segments of the mushroom farm community – growers, packers and processors, as well as providers of services, supplies and equipment. The Commonwealth of Pennsylvania is the largest producer of mushrooms in the United States, with 76 mushroom farms contributing 59 percent of the pounds grown, with a value of more than \$420 million. Utility expenses represent up to 20 percent of the cost of producing a mushroom crop.

Therefore, on behalf of our Pennsylvania members, we appreciate the attention that the Commission and staff have given to net metering, allowing for the benefits of renewable energy generated on the farm to flow to the operation. The existing rules benefit the utility, not the farm, which was the original intent of the legislation.

At a mushroom farm, there are typically several buildings, and sometimes residences, with their own meters, some with residential rate schedules and others with commercial schedules. All of the buildings that are part of the farming operation should be included in net metering so that the full economic benefits are applied.

The regulations should be changed for both physical and virtual meter aggregation so it reads, "*regardless of rate class*," so that all buildings and demand load are included. In order to deal with multiple rate classes, we recommend that onsite generation is first applied to the meter through which the system feeds. Then all excess should be applied equally to other meters in the farm operation, allowing each meter to maintain its current rate class.

The mushroom farm community is actively pursuing on-farm renewable energy options. Changes to the net metering regulations will make this more economically viable. We appreciate your attention to our concerns.

Sincerely,

Laura Phelps
President

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