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3/9/06

Philip E Niel  
Keech Farm Service, LTD  
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The Pennsylvania Public Utility Commission  
Attention: Secretary  
P.O. Box 3265  
Harrisburg, PA 17105-3265

L-00050174  
M-00051862  
INDEPENDENT REGULATORY  
COMMISSION

2006 APR -7 PM 1:47

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Comments Of  
Keech Farm Service, LTD  
Philip E Niel

Dear Sir or Madam,

Thank you, for hearing us. We commend the Commission and staff for positively addressing net metering, to allow for the benefits of renewable energy generated on the farm to flow to the operation. Clearly the existing rules benefit the utility, not the farm, which was not the original intent of the legislation. This is a big next step to correct that problem.

All of the barns, buildings and residences that are part of farming operations should be included in net metering so that full economic benefits are applied. Typically, these structures all have their own meters, some with residential rate schedules and others with commercial schedules.

The proposed regulations deal with the issue of multiple meters through physical and virtual "meter aggregation". This is defined as:

"the combination of readings and billing for all meters *in a particular rate class* on contiguous and adjacent properties owned and operated by customer-generator"

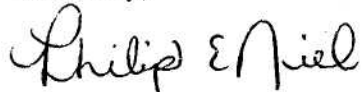
The language needs to be changed for both physical and virtual meter aggregation so it reads "*regardless of rate class*", so that all buildings and demand load are included. In order to deal with multiple rate classes, we recommend that onsite generation is first applied to the meter through which the 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.

Also, insurance companies that the individual has currently, such as homeowner insurance, should be accepted as insurance coverage. That should be allowed into this proposed regulation, allowing them, to co-generate power back into the grid.

Again thank you for your time and for hearing us.

Sincerely,

A handwritten signature in cursive script that reads "Philip E Niel".

Philip E Niel  
Keech Farm Service, LTD

Regarding

Docket # 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.