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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Comments Of
Pennsylvania Farm Bureau

Regarding
Docket No. L-00050175/M-00051865
Proposed Rulemaking Re Alternative Energy Portfolio Standards;
Interconnection Standards for Customer-Generators

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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April 24, 2006

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Secretary McNulty:

On behalf of the more than 38,000 rural and farm family members of Pennsylvania's largest general farm organization, thank you for the opportunity to submit the following comments regarding proposed rulemaking regarding the Alternative Energy Portfolio Standards, specifically the Interconnection Standards for Customer-Generators.

Pennsylvania Farm Bureau commends the Public Utility Commission and its staff for positively addressing interconnection allowing for the agricultural community to participate in clean distributed generation which will benefit our economy and environment. Unfortunately, while existing rulemaking is positively addressing issues related to our ability to interconnect to these resources, several barriers remain that will hamper agriculture's ability to participate. Allow me to discuss these matters in more detail.

The Commission's proposed rulemaking does not adequately encourage the development of alternative energy resources as originally intended by Act 213. We believe that the proposed rulemaking still includes several factors that will impede the development of renewable energy resources on farms in the state.

Insurance requirements are an issue of particular concern to the Pennsylvania Farm Bureau. Many rural landowners lack the necessary capital to invest in additional forms of insurance – and if the current proposed regulations requiring farmers to do so stand, it will become very difficult for farmers to invest in clean energy projects. We would like the Commission to note that the net metering regulations state that 'insurance may not be required by an EDC.' Therefore, the Pennsylvania Farm Bureau recommends that the Commission follow New Jersey's interconnection standards which do not permit additional insurance requirements.

The Pennsylvania Public Utility Commission

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Moreover, the Commission should allow for Level 2 review for non-inverter based equipment under appropriate conditions. Pennsylvania should not adopt interconnection rules that automatically require a more extensive, timely and expensive Level 3 review on non inverter based interconnection applications. Automatically requiring such a review creates a barrier for many types of systems such as farm based methane digesters that Act 213 is explicitly designed to support. We believe that this would create an unwarranted and unfair burden to the farming community and should be removed from the proposed rule.

Pennsylvania Farm Bureau urges the Public Utility Commission to revise these regulations so that they fully encourage the installation of distributed generation and do not discriminate against the customer-generator.

Thank you for the opportunity to submit these comments for the public record.

Sincerely,

A handwritten signature in black ink that reads "Carl T. Shaffer". The signature is written in a cursive, slightly slanted style.

Carl T. Shaffer