

Ideal Family Farms, LLC
P.O. Box 215
Schlinsgrove, Pa. 17870
570-374-2337

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July 31, 2014

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
PO Box 3265
Harrisburg, PA 17105-3265

RE: Docket L-2014-2404361
Proposed Net Metering Changes

Dear Commissioners:

Our farm's anaerobic digester system went online in June of 2011. We use it to treat manure from 10,000 finishing hogs. Our genset is rated 180 kW and we are net-metering with PPL on single phase. The maximum sized generator we could interconnect with PPL would be 200 kW unless we paid PPL to upgrade the 3-phase substation and that is not financially feasible for us to do.

The manure from our animal herd produces enough biogas to support a 100-120 kW output. This is about 170% of our annual electric consumption. We receive food waste which enhances the biogas and electricity output of the system. If we were to receive the maximum amount of food waste under DEP permitting regulation, our system could potentially produce up to 300 kW, but our genset will not produce over 180 kW and the lines will not accept more than 200 kW so we are already operating with kWh output limitations.

We sincerely hope that the PUC will reconsider their proposed net-metering regulations and sit down at the table with Renewable Energy project owners to come to a set of net-metering rules that supports Pennsylvania's energy future.

The proposed regulations are extremely restrictive of farm-waste anaerobic digester systems. Not all farm situations have a significant annual electric consumption, but they do have a significant amount of manure waste which can be responsibly and sustainably treated with anaerobic digestion. Limiting farms to a genset sized at 110% of electric consumption would

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not match the amount of "manure generated electricity" and would undersize a majority of farm digester systems.

Anaerobic digesters are the right thing to do. Turning wastes into fuel is in the greatest public interest and should be a major priority of the Public Utility Commission. It is understandable that a publically traded utility may not want to purchase renewable energy at retail, but the PUC should be in support of what's best for the citizens and consumers of Pennsylvania, not the just the Corporations with well paid lobbyists.

How did the proposed rule come about? We'd like to know what individuals or groups were involved and who drafted these net-metering guidelines?

Our operation costs are between \$0.02-\$0.03/kW to operate (\$25,000-\$38,000). These costs are in routine maintenance, oil changes and scheduled repairs. This does not include the need to fix or replace equipment such as manure pumps or digester mixers. If the new net-metering rules are put into place I doubt the project will make enough money from electricity sales to support keeping it in operation.

Would the PUC be willing to 'grandfather in' our Digester System?

Sincerely



Dennis Brubaker
Ideal Family Farms
PO Box 215
Selinsgrove, PA 17870

Cc: Representative Fred Keller