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July 24, 2014

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Pennsylvania Public Utilities Commission
Commonwealth Keystone Building
400 North Street
PO Box 3265
Harrisburg, PA 17105-3265
Attention: Secretary

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JUL 25 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Commissioners:

A number of our Pennsylvania Dairy clients have installed farm waste anaerobic digester systems are participants in the Commonwealth's net metering program. We are concerned that recent proposed net metering changes published on Saturday, July 5th 2014 in the Pennsylvania Bulletin will damage current and prevent future farm energy projects.

Existing and future 'on-farm' anaerobic digester systems need to be able to sell kWhs well in excess of site load requirements in order to pay back the capital investment on these projects.

Should the proposed net-metering changes go into effect, no new Farm digester system would be constructed in the State of Pennsylvania. Without the ability to produce power in excess of site requirements these projects are not and will not be financially viable; this technology will not have the opportunity to gain widespread implementation.

The rules as proposed are a "catch-all" encompassing all net-metering participants regardless of technology used for producing renewable energy. The solar, wind, waste coal, landfill gas and farm waste digester systems are each different technologies with separate impacts on the economy, environment and local grid. We ask that the PUC revise their proposed ruling to allow different considerations for different technologies.

We would like to suggest that the PUC follow the State of New York by setting different net metering rules for different classes of Renewal Energy Technologies. The classes suggested are as follows: Solar, Farm Waste Anaerobic Digestion, Landfill Gas, Waste Coal, and Wind Power. We ask the PUC to review and revise the AEPS to reflect separate rules and considerations for these different Renewable Energy Technologies

Farm anaerobic digestion has a number of benefits for the greater public good. These systems take manure and convert it into fuel and fertilizer. In addition to manure, many farm owners are receiving food waste that would otherwise go into a landfill as trash. Landfill diverted food

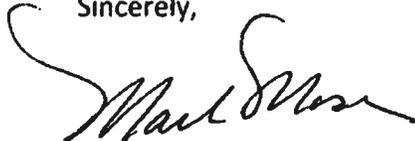
wastes are converted into fuel and fertilizer by on-farm anaerobic digester systems; this "waste" material is brought back to the farm where it is returned to the soil where it originated.

A byproduct of this process is increased biogas and electricity production. A limitation on engine size or output would put an end to diversion of landfill food waste in this manner.

In this light, RCM proposes that the proposed set of conditions for net-metering be waived for Farm Based Anaerobic Digester systems. Specifically we would like to suggest that the size and site load limitations be waived for anaerobic digester systems on farms. A maximum size limitation for these systems, if set at 2.0 MW, regardless of site electric load, would be an acceptable compromise.

If the PUC intends increase Renewable Energy supplies for the state, they must allow Renewable Energy Producers to produce and sell the maximum amount of electricity that can be produced. Putting any kind of limitation of the production of Renewable Energy is at its root an act directed against the greater public good and Pennsylvania's Energy Future.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Moser". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mark Moser

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