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

RE: Docket L-2014-2404361

Dear PUC and Mr. Chris Brown,

As you make updates and revisions to regulations to comply with Act 129 of 2008, and Act 35 of 2007 I ask that you consider our story and how our anaerobic digester (AD) has positively impacted our farm, community, and environment.

In 2008 we installed an anaerobic digester in central Pennsylvania. We were one of the first to use this relatively old technology. Our main reason for installing the AD was to reduce odors which we hoped would reduce neighborhood smell complaints. What we discovered was that AD not only reduces odors and produces electricity, but it is a great way to make our farm more sustainable. In fact, many of the things that we are now doing with AD, we only discovered after we had installed it. We now capture the vast amount of heat the generator produces to heat our house, water, work shop, and barns, virtually eliminating the need for fuel oil on our farm. We use the heat to dry our corn which saves us money on feed costs. Our calves are healthier because we feed them a milk that is pasteurized with the heat from the AD. We did not realize all the sustainability benefits that the AD provided for our farm, but are able to use it to pursue more sustainable farming practices.

The AD may not have made financial sense to install had it not been for the current regulation that was enacted that required electric companies to purchase electricity back from our farm. For many on-farm Anaerobic Digesters, electric sales are their greatest source of AD income. Without the current regulations, many of those digesters would cease to exist because the other sources of revenue would not be enough to cover the upkeep and maintenance costs.

If there were a low cap on the amount of electricity our digester was able to produce it would diminish the financial viability of our AD. Our digester is designed to generate 140kWh of electricity which is much more than our farm uses on a daily basis. If our farm was capped at 60kWh, depending on what the current market rate per kWh, the excess electricity being sold back to the grid may not be enough to cover the cost of operating the AD. With a high kWh cap it is much easier to afford the AD and consequently benefit the farm, community, and environment.

With that being said, I understand why in the future there may be some sort of cap to the amount of electricity produced by alternative energy sources. When the sun is not shining and the wind is not blowing, someone somewhere needs to produce enough power to make up the energy deficit from wind and solar farms. It is hard for power companies to predict this and therefore very challenging for them to constantly balance the energy output if they cannot control the energy sources. However, unlike wind and solar,

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digesters are not depended on weather to make energy. Our digester is running at full to near full capacity 99% of the time. Thus it should not be considered as unreliable as wind and solar.

I ask that as you do make changes to the current regulations, you carefully consider how the changes will affect on-farm anaerobic digestion. Each alternative energy source works and functions differently, and what may seem fair and reasonable for one alternative energy source could negatively affect another. An AD is the only alternative energy source that I know of that takes something that would be considered harmful to our environment (methane) and turn it into something good – electricity.

If our goal as a nation and state is to become energy independent, limiting the amount of energy that alternative energy source create would be contrary to what we are trying to accomplish. Perhaps instead of looking to cap alternative energy sources we should be looking to bolster and improve infrastructure to allow for Anaerobic Digester technology, solar, and wind to help drive us to energy independence.

Sincerely,

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**Brett Reinford** 

**Reinford Farms Inc.**