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Robert Altenburg
Citizens for Pennsylvania's Future
610 N. Third St.
Harrisburg, PA 17101-1113

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Please accept these comments submitted on behalf of energy professionals, business entities that own solar, and concerned representatives of Pennsylvania's non-profit sector.

In addition to their attached individual comments, they have also expressed support for the following core comments

Sincerely,

A handwritten signature in black ink that reads "Robert C. Altenburg".

Robert C. Altenburg (ID #: 209540)
Citizens for Pennsylvania's Future
Ph: 717.214.7933
altenburg@pennfuture.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Implementation of the Alternative
Energy Portfolio Standards Act of 2004**

Docket No. L-2014-2404361

JOINT COMMENTS OF ENERGY INDUSTRY PROFESSIONALS

1. We oppose the changes in §75.13(k) that would give the Commission authority to allow utilities to charge a new special monthly fee to customers with solar. We believe this new fee would violate the AEPS guarantee that net metered customers receive the full retail rate for all generation of their solar installation up to their annual usage. A fee would erode that right to receive credit at the full retail rate. Moreover, the proposed change fails to provide any basis for determining this fee. If there is to be a fee, it should be based on a full cost of service study that evaluates both the costs and the benefits of each specific net metered system.

2. We believe the proposed new definition for “utility” §75.1 is overly broad and threatens the third-party ownership model for solar and other distributed generation which the Commission has approved in prior dockets. While the discussion section of the Proposed Rulemaking Order (page 7) indicate the new definition of “utility” is designed to allow non-electric utilities such as water and wastewater utilities to qualify as a customer-generator, the “utility” definition could be interpreted to apply to solar and other alternative energy developers who build and own systems and sell the output to the host customer through a long-term power purchase agreement. We urge the Commission to amend the definition of “utility” so the ability to use a third-party ownership business model is preserved.

3. We disagree with the proposed change in §75.13(a)(3) for the new system size limit of 110% of the customer-generators annual electric consumption. This new limit is added to the existing system capacity limits of 50 kW for residential systems and 3 (or 5) MW for nonresidential systems. We believe this additional size limit is unnecessary and only adds additional uncertainty and regulatory cost, which is ultimately paid by all ratepayers. The AEPS statute creates an environment where there is no incentive to over-size systems since any annual surplus production does not receive net metering treatment and is compensated at the lower price-to-compare rate. Sizing a system to overproduce on an annual basis does not make economic sense and additional system size restrictions are simply not necessary. We also believe the new size limit would be difficult to apply (especially in new construction or gut rehab projects) and could present additional time and expense for customers. And the language of the proposed change does not prevent the 110% limit from being applied repeatedly each year, which could mean a system that once qualified may not qualify in future years as a customers load shrinks over time through energy conservation or changed electric usage of the building, such as from less occupants in the building.

4. We oppose the proposed change in §75.12 to the definition of “virtual meter

aggregation” that adds a requirement that all service locations must have separate existing measurable load. It should be sufficient that the customer-generator have measurable electric load, not that each meter of the customer-generator have measurable load. This proposed change would prevent appropriate siting for virtual net metered systems as it requires systems to be installed in proximity to customer-generators existing meters that have a measurable load. This violates the AEPS legislations intent to promote new clean distributed generation. In the case of new construction, we do not believe that it was the intent of the legislature to mandate a measurable load to exist before the new construction and the net metered energy system is built. We believe it is reasonable to allow generation installed before a measurable load is established to be carried forward within the year in accordance with existing regulations.

5. We do not support the proposed deletion in §75.51(c) of the Commission ability to appoint a technical master to assist in the resolution of any disputes under the interconnection application/review process. We understand the Commission has not made use of its power to appoint a technical master, but nevertheless see no reason to cancel this authority. We are particularly concerned that residential customers and small business are already at a disadvantage when faced with disputes regarding the technical application of the regulations and, with increasing complexity, this is expected to continue. For this reason, it is premature to delete the provisions.

6. We support the Commissions effort to clarify the confusion around “Year and Yearly.” While we support revising the definition of Year and Yearly, we recommend using the calendar year rather than May, 1 through April, 30 as proposed. A reporting year ending December 31 would end when solar production is at its lowest, whereas solar output is only a bit lower on April 30 than it is on May 31. We thank the Commission for consideration of these views as they relate to the proposed changes to net metering.

Mrs. Joan Alexander
5 Buttonwood Avenue
Frazer, PA 19355

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I installed solar power on my home last year. It would be a great disservice to allow utilities to assess special charges to persons like me who made an investment in the environment and the future by installing solar panels on their home. I do not make a big profit on my panels, instead, I am contributing towards a cleaner environment for our citizens and future generations.

/s/

Mrs. Joan Alexander

Mr. William Armor
535 University Drive
Biglerville, PA 17307

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I am a residential customer who has invested a substantial amount of retirement savings to build a 10k solar system to take care of future energy needs. I was encouraged to do this through federal and state incentives. Met Ed currently buys back excess kw at a rate lower than that charged to customers and rarely reads the meter. I feel that a charge on net metered customers would unfairly penalize me for investing limited retirement funds to help alleviate the problem of "dirty" energy which the state is obviously still dealing with. I have 3 retired neighbors who did the same. I also feel that the charge is unwarranted. Gas companies may operate in Pa and earn millions while not paying certain taxes or fees but we want to discourage investment in clean solar energy? I hope that the little guy isn't forgotten !!

/s/

Mr. William Armor

Mr. Jack Berger
2001 North Front Street
Harrisburg, PA 17102

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I am vehemently opposed to proposed changes to the net-metering policies of the PUC. In a world that is rapidly overheating due, in part, to the burning of fossil fuels to generate electricity, the PUC (and other public-policy makers) should be doing all they can to promote the generation of electricity via photovoltaics (and wind, etc.) rather than dissuade it. The concept of imposing a fee on individuals simply for generating their own electricity (thereby reducing the strain on public electrical generators) is absolutely ludicrous. Furthermore, limiting private-power generation to 110% of the generator's use is self-defeating; while it is true the utility must pay the consumer for the surplus electricity generated, it turns around and sells it again to another customer, thereby at least breaking even (and possibly making a profit). I also oppose the proposed broadening of the term "utility", as it could be construed to include single-family homeowners, which could over-burden individual families who are simply trying to do the right thing by reducing the strain on the Grid with unnecessary regulations. And lastly, I oppose eliminating the Commission's authority to appoint a technical master to assist in the resolution of disputes. As more and more individual co-generation sites emerge, so will disputes. Individual families who are simply attempting to reduce their electric bills should be able to contact one specific individual to address grievances with rather than to have to deal with, and get lost within, a major bureaucracy.

/s/

Mr. Jack Berger

Mrs. Dara Bortman
Exact Solar
1655 Fairfield Rd
Yardley, PA 19067

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We believe any changes should make it easier for residential consumers in PA to install solar energy systems on their homes. There should be no limitations that make it more difficult for new owners to get systems (i.e., no history of electricity usage in that home shouldn't be a problem), and accommodations should be made for future increased electricity usage (i.e., purchase of electric vehicles, installation on electric heat pump, etc). Further, customers with detached structures on their property (i.e., garages or barns) should not have issues installing solar panels on any of their structures to generate electricity for the entire property.

/s/

Mrs. Dara Bortman

Mr. Mark Bortman
Exact Solar
1655 Fairfield Rd
Yardley, PA 19067

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Solar energy makes sense – it makes sense financially and environmentally. It has also shown to be beneficial to the electric grid. The PUC should be encouraging more solar energy.

/s/

Mr. Mark Bortman

Dr. Kristine Boward
The Center, LLC
133 Ivy Lane
King of Prussia, PA 19406

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We are solar powered and have worked hard to reduce our carbon foot print to the benefit of everyone. We have paid for electric cars for our team as well. It seems shameful to charge us more for being conscientious and reward a power company for the excessive rates which partially encouraged our switch to solar power.

/s/

Dr. Kristine Boward

Mr. Patrick Brooks
Daylight Power Company LLC
PO Box 393
Chester Heights, PA 19017

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Please listen to the PASEIA, my business needs your help and they have my best interests, and everyone else's, in mind. I strongly support the following coalition comments. Thank you. - We oppose the changes in 75.13(k) that would give the Commission authority to allow utilities to charge a new special monthly fee to customers with solar. - We do not support the proposed deletion in 75.51(c) of the Commission ability to appoint a technical master to assist in the resolution of any disputes under the interconnection application/review process. - We disagree with the proposed change in 75.13(a)(3) for the new system size limit of 110% of the customer-generator's annual electric consumption.

/s/

Mr. Patrick Brooks

Mr. Dave Closterman
4206 York Dr
Doylestown, PA 18902

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Any changes to the net metering that allow utilities to charge extra to customers with solar would greatly effect the feasibility of residential solar PV! I would anticipate a reduction in my company sales of at least 10%. Interest in Solar PV is high people want it and believe in it. Total installation costs of lowered by almost 50% in the last 4 years! Please do not allow any changes that will slow down the momentum. Thank you.

/s/

Mr. Dave Closterman

Mr. Robert Cohen
Frog Hallow Tennis and Raquet Club
2115 Weber Road
Lansdale, PA 19446

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I thought that PA was trying to encourage not discourage the use of solar. Proposed changes would add cost to my business which installed solar panels to save money and help the environment. We took advantage of federal and state credits and rebates which effectively encouraged us to install the solar. It makes no sense to propose legislation to add to the cost of solar installations rather than maintain or reduce costs for solar.

/s/

Mr. Robert Cohen

Mr. Anthony Cotton
410 Sumner Way
West Chester, PA 19382

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The changes in 75.13(k) that would give the Commission authority to allow utilities to charge a new special monthly fee to customers with solar should be based on a full cost of service study that evaluates both the costs and the benefits of any specific net metered configuration. To the extent that such a configuration (with local storage) can provide a stable load profile with high power factor (approaching 1.0), that this configuration be compensated in excess of retail rates as it precludes a proportionate amount of grid regulation that would otherwise be compensated by the utility thru the regulation markets.

/s/

Mr. Anthony Cotton

Mr. Tim Cox
1522 Penn Ave
Wyomissing, PA 19610

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Proposed changes to net metering is the wrong direction to go for the long term sustainability of our state and our country. It is time to stand up for the individual home owner and not for the big utilities. We need to decrease our dependence on fossil fuel sources for energy generation. Renewable energy is the only solution for the future. Encourage it and promote it.

/s/

Mr. Tim Cox

Mr. Joseph Coyle
Open Sky Energy
6 Park Ave
Swarthmore, PA 19081

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Open Sky Energy support the efforts of PennFuture, MSEIA, and the Net Metering Coalition to protect solar and net metering in Pennsylvania. As a small solar company who primarily focus on Pennsylvania installations, we feel anything geared towards slowing the growth of solar energy would be devastating to our company and continued operations here in Pennsylvania. We specifically oppose the monthly fee for solar customers, the 110% limit on installation size and the required on-site electrical load for virtual net metering. We are in favor of amending the term "utility" to protect 3rd party solar owners as well as changing the calendar year to January through December. We have come so far as an industry and hope the PUC works on rules that will continue solar growth.

/s/

Mr. Joseph Coyle

Mr. Donald Dale, AIBD
2086 New Dalville Pike
Lancaster, PA 17603

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I agree 100% with the core coalition comments below, as it would negatively affect my clients ability to become energy efficient and independent with the new house (or additions) designs I provide them. I urge you to consider the comments below on behalf of all my clients and myself.

/s/

Mr. Donald Dale, AIBD

Mr. John Daubner
226 Spruce ST
Canonsburg, PA 15317

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I think we need to be supporting alternative energy sources, to allow them to develop, instead of making it more expensive.

/s/

Mr. John Daubner

Mr. Thomas DelVecchio
Affordable Associates Inc.
2930 Concord Road
Aston, PA 19014

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As a solar installer, this would put me out of business. Period.

/s/

Mr. Thomas DelVecchio

Mr. Mike Drei
ESI Power
2632 State Rt. 72
Jonestown, PA 17038

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We are employer with over 60 people. If these rules change, it could force us to reduce our workforce. It will also make PA uncompetitive with nearby states that have a robust net-metering policy for solar and other renewables.

/s/

Mr. Mike Drei

Ms. Denise Duryea
419 West St
Pittsburgh, PA 15221

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Any impingement on the rights of solar panel owners offsets the benefits, making it harder to justify the initial expense. Solar energy generation is irrefutably cleaner than the natural gas generation that has been supported by the Commission, and defended despite overwhelming evidence that it is detrimental to the health of Pennsylvania's citizens. Sustainable sources of energy should be embraced as the future of energy production.

/s/

Ms. Denise Duryea

Mr. Mike Duus
Solar Innovations, Inc
31 Roberts Road
Pine Grove, PA 17963

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We oppose any special monthly fees, prohibition of third-party ownership, limits to system size and virtual meter aggregation.

/s/

Mr. Mike Duus

Ms. Jennifer Engle
1845 Brubaker Run Rd.
Lancaster, PA 17603

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

These proposed changes are unnecessary and ill advised steps back in moving PA toward a more sustainable future. Clarity is needed , not change.

/s/

Ms. Jennifer Engle

Mr. Ben Fetrow
9000 Virginia Manor Road
Suite 250
Beltsville, MD 20705

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

It should be ILLEGAL to tax or charge a fee for people who go solar!!! The point of solar is that is it free power from the sun! Customers should also continue to gain credits for excess energy produced. SolarCity will be expanding to Pennsylvania in the coming years and these rules would keep PA in the STONE AGE. States that adopt solar have better economies, improved property values, cheaper utility bills, and happier customers.

/s/

Mr. Ben Fetrow

Dr. Michael Finewood
1 Woodland Road
Pittsburgh, PA 15232

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I oppose the changes in 75.13(k) that would give the Commission authority to allow utilities to charge a fee to customers with solar. I believe the proposed new definition for “utility” 75.1 is overly broad and threatens the third-party ownership model for solar and other distributed generation which the Commission has approved in prior dockets. I disagree with the proposed change in 75.13(a)(3) for the new system size limit of 110% of the customer-generator’s annual electric consumption. I oppose the proposed change in 75.12 to the definition of “virtual meter aggregation” that adds a requirement that all service locations must have separate existing measurable load. I do not support the proposed deletion in 75.51(c) of the Commission ability to appoint a technical master to assist in the resolution of any disputes under the interconnection application/review process.

/s/

Dr. Michael Finewood

Mr. William Fitch
1072 Fowlersville rd
berwick, PA 18603

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

From a general perspective, all regulations should be crafted in such a way as to promote solar growth and reduce initial and ongoing costs for adopters. Special fees to the utilities are a result of shallow thinking into the areas of Utility model adaptation and government revenue seeking. The utility model has to change in a direction that PROMOTES Renewable Energy, not penalize it. Finding creative ways to enable revenue for all WITHOUT making Renewable Energy more expensive is the real bureaucrats challenge.

/s/

Mr. William Fitch

Dr. John Flohr
Solar Way Energy
230 european dr
fleetwood, PA 19522

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Solar business in Pennsylvania was funded by state and federal initiatives. Unfortunately, the policy on RECs was not in the best interest of the state. PA is open to any person in any state to sell their RECs. In Ohio, they protected the state investment by holding two monthly auctions; one for in-state producers and the second for anyone. Ohio legislation and policy helped Ohio residents recapture their investments more quickly through higher REC state prices for residents. The changes for net metering also destroys clean energy production and new builds in the state. Home solar generation helps companies such as MET ED to help generate clean energy for PA citizens. Thank you.

/s/

Dr. John Flohr

Mr. Robert Franks
875 Liberty Valley Rd
Danville, PA 17821

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I believe these proposed changes go against what should be PA's goal of encouraging the smart development of alternative energies into the future and back the core coalition comments as stated below. Sincerely, Robert S. Franks

/s/

Mr. Robert Franks

Mr. Joe Fucci
535 Clever Road
McKee's Rocks, PA 15136

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Enacting your proposed changes seriously jeopardize my own job stability as well as my co-workers. It also undermines all the hard work put forth over the past 5 years in growing the renewable energy sector in PA. You should be working on ways to expand the growth, not strangle it. Please seriously consider the comments below.

/s/

Mr. Joe Fucci

Mr. Melvin Gehman
6151 Valley Glen Rd
Annville, PA 17003

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I oppose changes that change economics that effect units that are in operation . I am concerned because Met-Ed is already giving billing item line increases as of June. I am opposed to the proposed 75.13 changes that increase cost and make changes away from the original intent of the AEPS Legislation . Thank you Melvin Gehman

/s/

Mr. Melvin Gehman

Mr. William Geyer
1980 Fairview Rd.
Montoursville, PA 17754

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Please add my name to those strongly opposed to the proposed changes to net metering.

/s/

Mr. William Geyer

Mr. Micah Gold-Markel
Solar States
1400 N. American St.
Suite 401
Philadelphia, PA 19122

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

/s/

Mr. Micah Gold-Markel

Ms. Sharon Gross
3926 Landis Road
Collegeville, PA 19426

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I oppose changes to PA's net metering laws that would allow utilities to charge fees to customers that are providing solar energy. Additional regulatory costs are also debatable.

/s/

Ms. Sharon Gross

Mr. David Hammes
527 Creek road
Doylestown, PA 18901

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I agree with the Core coalition comments below and this anti solar energy/ net metering docket will continue to erode hundreds and hundreds of more jobs from Pennsylvania. Please don't put me and hundreds of others out of business for the purpose of monopolies for utilities. We want to coexist. David

/s/

Mr. David Hammes

Dr. Nicholas Hanchak
820 Bainbridge Drive
West Chester, PA 19382

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The proposed changes would add costs to being green and provide a diminished incentive for consumers and businesses alike to take up the capital costs of green initiatives.

/s/

Dr. Nicholas Hanchak

Mr. Paul Hartley
Equinox Engineering
2628 Kutztown Road
Pennsburg, PA 18073

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Dear PA PUC, Please take seriously the comments submitted by the referenced Energy Coalition. All of us in this Commonwealth will benefit from strong Net Metering rules that preserve the real benefits of Solar Energy generation. My office will soon be powered by clean solar energy, and I believe that the proposed changes to the Net Metering rules will have a negative impact on the value of this investment. The Energy "year" should follow the Calendar year so that energy harvested in the spring can be utilized and given its full value during that same year. This, to me, is just common sense. Thank you for your careful consideration of these comments, Respectfully, Paul R. Hartley, PE Owner, Equinox Engineering

/s/

Mr. Paul Hartley

Mr. Brandon Igdalsky
Pocono Raceway
PO BOX 500
1234 Long Pond Rd
Long Pond, PA 18334

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

IN addition to the stated Coalition's comments, I would like to add that Pocono Raceway set long term goals for our 3MW solar farm. The farm was the largest at a sports venue in the world until just a few weeks ago when Indianapolis Motor Speedway fired up their 9MW system. We are a privately funded \$15.6 million dollar project and since the AEPS has yet to be changed to close our borders to our site projects that have decimated our SREC market and made the ROI on such a system tremendously more expensive, such a rule change will once again hurt a potentially huge market for the commonwealth. Such a move would hinder growth, job creation and new business to evolve in the changing economic and social climate.

/s/

Mr. Brandon Igdalsky

Ms. Diane Isett
1001 Antonio Drive
Reading, PA 19605

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

This should not be allowed! This will violate the renewable energy investment agreement that was implemented to protect Solar Generation in Pennsylvania. The Pennsylvania Chamber of Commerce was founded by the Utility Companies of Pennsylvania And clearly have only the utility companies profits in mind with try to promote these disgraceful proposals. I think The PUC should increase the amount of Solar energy required to be used by the utility companies, thus increasing the value of the AEP credits to the Solar Generation investors! We need to PROMOTE RENEWABLE ENERGY not DEMOTE IT!

/s/

Ms. Diane Isett

Dr. Peter Jansson
124 Meixell Circle
Lewisburg, PA 17837

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I personally believe a change to the net metering regulations would seriously undermine a sound and balanced energy strategy in Pennsylvania - The special interests that are lobbying for the elimination of net metering are not doing so in the broader public interest. Individuals who make investments in renewable energy are saving utilities billions in added capacity costs and net metering is one policy that helps to compensate individual investors for benefits they provide to the larger society.

/s/

Dr. Peter Jansson

Mr. Tom Johnson
Motor Meadows, LLc
Ambler, PA 19002

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I am 100% oppose to the changes in 75.13(k) that would give the Commission authority to allow utilities to charge a new special monthly fee to customers with solar. In discussions with one of the key personnel in PECO, they said they only have 2500 Solar Clients with solar and that it was insignificant to their structure. But they still were going to pursue this recourse anyway. On installations that the residential or commercial customer impacted the local integrity of the utilities lines the customer were charged for upgrading to the utilities systems. Why should they, the customer, be impacted any further?

/s/

Mr. Tom Johnson

Mr. & Mrs. Tim and Brenda Kauffman
804 New Holland Av
Lancaster, PA 17602

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We totally oppose the idea of allowing the utilities to charge a tax for alternative energy sources. We installed the first PV system in the PPL district in 2004. For 10 years they have had the wrong meter installed and they refuse to install a net-meter at our office. We changed suppliers and the new company has ignored our PV system. Humankind must move from fossil fuels in order to survive but that will not happen as long as utilities are permitted to tax the sun. Please keep the public at large in mind when you vote. Utilities are important but so are people. When the sun stops shining we have no life on earth.

/s/

Mr. & Mrs. Tim and Brenda
Kauffman

Mr. & Mrs. Martin Kenney
150 Grubb Rd
Malvern, PA 19355

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Unbelievable that this is going on.

/s/

Mr. & Mrs. Martin Kenney

Mr. Steven Knaub
207 Senate Avenue
Camp Hill, PA 17011

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The proposed rule-changes would negatively impact project designs, value to clients, and environmental impact improvements. They also negatively impact me as a homeowner invested in solar. I oppose the proposed changes. They will take us backward. It is the job of government, in part, to prepare for the future. Do not let us down by promulgating these changes. Thank you.

/s/

Mr. Steven Knaub

Mr. Fred Kraybill
Thomas Blvd Group
Pittsburgh, PA 15208

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I support the comments of the Pennsylvania Net Metering Working Group. I am a 60% owner of Thomas Blvd Group LLC, a business which rents 6 apartments in Pittsburgh. We installed solar and oversized our system for future expansion to allow for electric cars and geothermal or mini splits which will increase our electric consumption. It seems to be a burden that I am discouraged from planning for the future to cut carbon emissions by using cleaner methods of transport and house cooling (electric cars & geothermal). My solar helps to cut peak demand on the grid by generating most of its power during the peak of demand on the grid. Solar is very valuable in cutting peak demand and shifting it to off peak hours. It seems like I am being penalized for planning for future expansion of my electric use. I am stuck in your 110% box. I even pay a lower rate for generation over 100% and I have to wait a year to get that money back. Please take steps to encourage solar and clean energy. We really need it to slow climate change. Thanks!

/s/

Mr. Fred Kraybill

Mr. Michael Lebo
1918 Greenwood Street
Harrisburg, PA 17105

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Future solar projects are difficult enough without the PA Sunshine Rebate. Take away net metering, and the oil and gas companies have won. All sources of energy need to be considered for use. Conserve the fossil fuels. Someday they will expire. Let the solar owners get the benefit from their solar installations. Keep net metering intact.

/s/

Mr. Michael Lebo

Ms. Linda Listing
PO Box 105
Canonsburg, PA 15317

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Although I haven't put in Solar Panels yet, I would like the right to do so with net metering in the future.

/s/

Ms. Linda Listing

Mr. Akil Marsh
Solar States
1400 N. American St
Suite 401
Philadelphia, PA 19107

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I co-own a small solar installation business based in Philadelphia. Our mission is to not only improve the environment with clean, solar electricity but to also create jobs for at risk youth in Philadelphia. I wholeheartedly support the comments made by the Pennsylvania Net Metering Working Group. I hope that the PA PUC considers how the proposed rule changes for net metering could inhibit the solar industry's ability to create good paying jobs in Pennsylvania communities. Studies in Minnesota and other jurisdictions have proven that solar provides considerable economic and societal benefits. Pennsylvania should be at the forefront of the green jobs movement. Lets make sure that the proposed changes to net metering don't stop progress in its tracks. Thanks for your time.

/s/

Mr. Akil Marsh

Mr. Frank Marshall
2001 N. Front St.
Harrisburg, PA 17102

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I personally do not support making more disincentives for solar in PA. My understanding is that solar energy earns \$500 in Washington DC compared to \$16 in PA with the current Energy Recs. As communities experience more and more random power outages. Solar is important to keep businesses running without interruption.

/s/

Mr. Frank Marshall

Mr. James Mascaro
100 Front Street
Suite 265
West Conshohocken, PA 19428

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Changing the rules will harm many good Pennsylvania companies trying to survive.

/s/

Mr. James Mascaro

Mr. Joseph F McLaughlin
213 Grant Avenue
Pittsburgh, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I oppose regulations to limit the amount of electricity that can be fed back into the system by a small business or private home owner. This is totally in violation of what we need- exactly more of that type of micro-grid generation if we are to deal with infrastructure and greenhouse gas problems.

/s/

Mr. Joseph F McLaughlin

Dr. Diane McMahon
5129 Penn Avenue
Pittsburgh, PA 15224

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Dear Commissioners - The time to act for our children is now! Please help promote the use of solar energy, a clean source of power that will not harm the health and well being of PA residents and future generations. Do not buckle to the selfish monetary greed of dirty corporate polluters.

/s/

Dr. Diane McMahon

Mr. Christopher Mejia
Consolidated Solar LLC
PO Box 72
East Petersburg, PA 17520

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

These proposed changes will negatively impact our business, creating uncertainty in the market and damaging our industry.

/s/

Mr. Christopher Mejia

Mr. Robert Monk
Robert Monk Electric
4811 Springfield Ave.
Philadelphia, PA 19143

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I am an electrician and proponent of solar PV in both utility/grid-scale and distributed building-by-building applications. PA has missed an economic opportunity in allowing out-of-state energy consumers to gobble up our SRECs, destroying an emerging economy in small and mid-scale PV installations around the state. We should be talking about a statewide feed-in tariff mandate, not curtailment of net metering. Distributed generation makes the public more independent of grid operators, secure against disruptions in the global fuel supplies, and helps reduce grid operation costs by providing stabilization vs. concentration of renewable sources in grid-scale projects where wind or solar variability can start and stop all production at once. Solar PV installations are expensive, almost always require financing of some kind, and the economy for small installers like me benefits when we have access to 3rd-party owners. As materials costs continue to slope into the area where I can install an unsubsidized PV system, this will be critical in allowing me and other electricians to launch a PV division and double or triple my current employees.

/s/

Mr. Robert Monk

Mr. Pasquale Noto
Pennsylvania Renewables Inc.
1107 Old School Road
Quakertown, PA 18951

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As a solar installer, company owner and solar generator I agree with the comments made by the coalition to the PUC of Pennsylvania. Our business supports the public utilities in meeting their clean energy mandates and the proposed changes would make things more uncertain in an already difficult business environment. Regards, Pat Noto President Pennsylvania Renewables Inc.

/s/

Mr. Pasquale Noto

Mr. Daniel O'Brien
SolarDock
PO Box 711
201 W. 14th Street
Wilmington, DE 19899

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We oppose the changes in 75.13(k) that would give the Commission authority to allow utilities to charge a new special monthly fee to customers with solar. We believe this new fee would violate the AEPS guarantee that net metered customers receive the full retail rate for all generation of their solar installation up to their annual usage. A fee would erode that right to receive credit at the full retail rate. Moreover, the proposed change fails to provide any basis for determining this fee. If there is to be a fee, it should be based on a full cost of service study that evaluates both the costs and the benefits of each specific net metered system.

/s/

Mr. Daniel O'Brien

Mr. Steven Peebles
All Good Energy
1505 Hilltop Road
Leesport, PA 19533

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We have a very poor solar market as it is? Why make it even poorer with fees?

/s/

Mr. Steven Peebles

Mr. Bret Peters
234 Liberty Street
Harrisburg, PA 17101

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Pennsylvania is benefiting from an unusual period of cheap energy due to gas production; we all know a strong, resilient Pennsylvania required a variety of power supplies. The sun is an inexhaustible source that must be developed as a responsible part of the energy matrix serving Pennsylvania. Legislation that raises the cost of solar power production are short sighted and best and truly foolish in the long run. Please block these competition-reducing measures.

/s/

Mr. Bret Peters

Mr. & Mrs. Joel Plotkin
Hundredfold Farm Co-housing community
1400 Evergreen Way
Orrtanna, PA 17353

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We particularly oppose the new monthly fee proposal. We are happy to pay the regular access fee but should not be penalized for our efforts to produce alternative energy. As members of Adams Co. Electric coop, we feel our solar panel generation helps members to keep prices competitive. We see no reason to limit the size of the panels. The market can and should absorb more solar power. Other states have successfully created equitable markets for solar generation and PA can too. The proposed changes penalize the homes and businesses that wish to produce solar energy.

/s/

Mr. & Mrs. Joel Plotkin

Mr. Charles Reichner
HeatShed
Heat Shed Inc
PO Box 336
Revere, PA 18953

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Our business installed over 250 solar systems. These proposed rule changes would effect the investments made by these clients. there is no basis for a monthly fee. Many transmission lines were installed under rural electrification at no cost to the utilities. Solar produces the most at peak power demands thus reducing the need for utilities to purchase expensive KWH on the spot market. Solar is distributed power and the more installed the less need for new transmission lines. There is no economic reason for making a solar system larger than the customers usage other than plans for greater power usage such as electric cars/trucks or use of splits for heating and cooling. Setting an arbitrary(110%) limits the future choices of the public contrary to the PUC's purpose. The precedent has already been set for virtual net metering in that utilities have approved virtual net metering w/o a measurable load and in fact have set power new power lines to accomplish this. It would be to everybody's advantage to have the net metering on a calendar year basis. The current model for the power grid will have to change to accommodate more renewable energy . There is a study by Steven Nadel published on ACEEE that addresses the unfounded fears of the utilities regarding renewable energy

/s/

Mr. Charles Reichner

Ms. Stacy Richards
SEDA-COG's Energy Resource Center
201 Furnace Road
Lewisburg, PA 17837

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

SEDA-COG's Energy Resource Center (ERC) strongly concurs with the PA Net Metering Working Group's core comments to the PUC regarding proposed changes to net metering regulations. For several years the ERC has been assisting our public and private facility owners through 11 counties in central Pennsylvania to install and own solar PV if appropriate and possible following implementation of cost-saving energy reduction measures. The current net metering regulations are well-suited to promoting local ownership of solar, which serve to reduce annual and cumulative energy costs as prices increase over time, and promote the myriad of opportunities to develop community-solar projects. When combined with future solar storage, local ownership of solar arrays paves the way for reduced reliance on the electric grid, increased energy supply security, greatly enhanced emergency response capability, and other benefits including enhanced local economic resiliency through job retention and creation.

/s/

Ms. Stacy Richards

Mr. Dennis Rittenhouse
Brook Ledge Horse Transportation Inc
PO Box 56
Oley, PA 19547

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We have invested in a solar array and oppose any attempts to change the net metering functionality. As a company, we philosophically support the net metering concept as well as opposing receiving a reduced payment for our investment. We need to support "green" technologies for a better environmental, not inhibit them with additional costs.

/s/

Mr. Dennis Rittenhouse

Ms. Anna Rosenblum
5530 Penn Ave.
Pittsburgh, PA 15206

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The proposed changes will make PA very unfriendly to renewable energy sources and will cause us to take a step back on our journey towards clean energy. Additionally, these changes would greatly affect the Millvale Library, who is able to afford their current solar array in part due to the net metering they engage in. Please reconsider and allow net metering to continue without a limit. Thank you!

/s/

Ms. Anna Rosenblum

Mr. Adam Rossi
Adam Solar Resources
1912 Mayview Road
Bridgeville, PA 15017

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As an owner of a Pennsylvania solar installation company and electric bicycle dealer I urge you to reconsider the proposed changes to PA Net Metering rules. My biggest complaint would be the 110% rule, as the logistics of enforcing and measuring it would be extremely difficult. The changes a home or business can go through over the years would obviously make their usage swing (example: bigger family, electric car etc). In addition, since there is already a cap for both residential and commercial, those should simply be the maximums anyone can install to be net metered on their property. We need to increase renewable generation and any new legislation or rulings that hamper more renewable energy development is a huge negative for our state. Thank you for your consideration.

/s/

Mr. Adam Rossi

Mrs. Denise Rudar
244 Maryland Ave
Pgh, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The solar energy produced by our library helps offset the operating costs. The changes that are proposed would seriously hamper sustainability practices everywhere!

/s/

Mrs. Denise Rudar

Mrs. Starr Scorsone
5 Great Valley Parkway
Suite 210
Malvern, PA 19355

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Net metering is the key to solar energy model in the state. Without it we are doomed to continue the burning of fossil fuels.

/s/

Mrs. Starr Scorsone

Mr. Scott Searer
4101 N 6th Street
Harrisburg, PA 17110

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We oppose the proposed change in 75.12 to the definition of “virtual meter aggregation” that adds a requirement that all service locations must have separate existing measurable load. It should be sufficient that the customer-generator have measurable electric load, not that each meter of the customer-generator have measurable load. This proposed change would prevent appropriate sighting for virtual net metered systems as it requires systems to be installed in proximity to customer-generator’s existing meters that have a measurable load. This violates the AEPS legislation’s intent to promote new clean distributed generation. In the case of new construction, we do not believe that it was the intent of the legislature to mandate a measurable load to exist before the new construction and the net metered energy system is built. We believe it is reasonable to allow generation installed before a measurable load is established to be carried forward within the year in accordance with existing regulations.

/s/

Mr. Scott Searer

Mrs. Lisa Seel
213 Grant Avenue
Millvale, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

This policy will make Pennsylvania and even less welcoming place for solar energy, our library will not be able to sell as much electricity as it currently does, and ultimately these costs would take away from the services we are able to provide. The Millvale Community Library (MCL) is an independent, non-profit library that is not a recipient of state or county library funding. As such, we depend heavily on the sustainability plan we have implemented, in which our energy sell-back plays a huge part. Additionally, the MCL provides much more to the Millvale area than basic library services. As a social service organization in our small, underserved borough, we provide literacy and educational programs and assistance, and facilitate the access for many to other social service agencies. By reducing the amount of energy we are able to sell back, you put these important programs at risk. Thank you for your consideration of these comments.

/s/

Mrs. Lisa Seel

Mr. Michael Shadow
Sun Directed Solar
PO Box 10118
State College, PA 16805

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I feel that the changes you are proposing will greatly complicate how net metering works and will add to the confusion of understanding it. I also feel that PA needs to rise to the top and become a solar friendly state again. In 2010 investors from all over were flocking to invest money in solar energy in PA. Now you can't find anyone from outside the state that wants to put money into strengthening our electrical grid with distributed generation.

/s/

Mr. Michael Shadow

Mr. Bryan Shallow
5 Great Valley Parkway
Suite 210
Malvern, PA 19355

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The changes will destroy solar in the state of PA.

/s/

Mr. Bryan Shallow

Mr. Gary Sheehan
5 Mesa Lane
Malvern, PA 19355

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Expansion of metering options such as VNM, not restrictions, should be implemented to allow solar PV energy to work. The types of facilities and living situations that exist and will grow, and the needs of those facilities, should dictate how net metering options are designed. Not the other way around.

/s/

Mr. Gary Sheehan

Mr. P H Snyder
1632 LAH
Lake Ariel, PA 18436

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I have invested in solar to help save the earth for my children. If we loose net metering it will reduce the people that invest in home solar. People should rule not business.

/s/

Mr. P H Snyder

Mr. David Strunk
Strunk-Albert Engineering
804 Seven Bridge Road
East Stroudsburg, PA 18301

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Requirements for Net-Zero are coming. Architects want to design to those Net-Zero specifications. Net metering is the key. Don't make it more difficult than it already is.

/s/

Mr. David Strunk

Dr. Tom Tuffey
Community Energy Inc.
Three Corporate Center, Suite 300
100 Matsonford Road
Radnor, PA 19087

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As a PA based solar development company with a 2014 pipeline of 250 MW, we are successfully employing sound net metering rules in several states including NY, MASS, and MD. the proposed changes to the PA net metering regulations would present a substantive policy obstacle to solar development in the Commonwealth. Net metering, including virtual or remote net metering, is a critical means to place a distributed generation resource where it is best suited. Neighboring NYS has a progressive policy that is clearly drawing economic development dollars and jobs that could be in Pennsylvania. Solar energy has progressed from an incentive based to an economic market as seen from the emergence of so called solar "yieldco" Initial Public Offerings that provide investors with higher yield fixed income vehicles than are presently available in the finance markets. Solar Energy has entered a new paradigm with new economic development opportunities for those states with supportive policy. The proposed changes are heading in a direction that is not recognizing the opportunities. Community Energy endorses the comments of the Coalition and thanks them for their fine work.

/s/

Dr. Tom Tuffey

Mr. Jason Vey
213 Grant Avenue
Pittsburgh, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

This attack on sustainable energy in PA is unconscionable. Why is it okay for fracking to take place in our state 100% free of charge, but now you want to levy additional fees on those attempting to use genuine sustainable energy like solar power? In what way is this remotely a good idea, except to line the pockets of the utilities? The Public Utilities Commission is supposed to advocate for the people, not contribute to the coffers of the utilities companies. These changes are absolutely unacceptable and will only serve to ruin small and green businesses attempting to engage in sustainable operating procedures for a green environment.

/s/

Mr. Jason Vey

Ms. Iris Whitworth
211 Grant Ave
Millvale, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As the Executive Director of a community-based organization running on solar power—our office runs on solar, and comprehensive community plans in our member towns include solar production goals— we are strongly opposed to the changes being proposed. The majority of our communities are cash strapped. And in our towns the organizations willing to take on solar are typically non-profits. To continue encouraging the use of solar solutions in our communities' future, it is imperative that these changes NOT be made. Thank you for your consideration.

/s/

Ms. Iris Whitworth

Mr. Gregory Winks
Clean Energy Resources LLC
2400 Oxford Drive
Box 113
Bethel Park, PA 15102

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As a clean energy development consultant I am concerned with the changes being considered to Pennsylvania's Net Metering policy. I do believe there should be oversight with the policy, but in a manner that promotes responsible "growth", with a viable manner to monitor and regulate those participating in net metering. I oppose the changes in 75.13(k) as being arbitrary and punitive to customers that utilize solar. If there are any new fees incorporated it should only be done as a result of a full cost of service study that evaluates both the costs and benefits of each specific net metered system. Allowing utilities to unilaterally charge an additional monthly fee without specific justification could severely impact any potential benefit net metering offers to a customer, thus stunting the growth of our business opportunities in Pennsylvania. The proposed new definition for "utility" in 75.1 is overly broad and threatens the ability of solar and other alternative energy developers to build and own systems and then sell the output to the host customer through a long-term power purchase agreement. The proposed definition of "utility" must be amended and preserve the ability to use a third-party ownership business model. As a primary component of the business model at Clean Energy Resources, third-party ownership is critical to the growth of our business in Pennsylvania. Without this as a viable tool we will be faced to conduct more business outside the state. The proposed change in 75.13(a)(3) will create an administrative nightmare for customers and the P.U.C. There are already maximum system capacity limits, and the AEPS statute creates an environment where there is no incentive to over-size systems since any annual surplus production does not receive net metering treatment. Sizing a system to overproduce on an annual basis does not make economic sense and additional system size restrictions are simply not necessary. Customers and the P.U.C. will be faced with administrative nightmares when monitoring usage after home remodeling, energy efficiency projects, or having fewer occupants. This could mean a system that once qualified may not qualify in future years as a customer's load shrinks over time. I oppose the proposed change in 75.12 to the definition of "virtual meter aggregation" that adds a requirement that all service

locations must have separate existing measurable load. It should be sufficient that the customer have measurable electric load, not that each meter of the customer have measurable load. This proposed change would prevent appropriate siting for virtual net metered systems as it requires systems to be installed in proximity to a customer's existing meters that have a measurable load. This severely impacts the AEPS legislation's intent to promote new clean distributed generation. I thank the Commission for consideration of these views as they relate to the proposed changes to net metering. Respectfully, Greg Winks Owner Clean Energy Resources, LLC

/s/

Mr. Gregory Winks

Mr. Brian Wolovich
Millvale Community Library
213 Grant Avenue
Millvale, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The Millvale Community Library provides library services to the nearly 4,000 residents of the Borough of Millvale. Our community members have an average income that is half of the state average, and a population that is less than half of what it was just a few decades ago. In order to make the library work within our limited tax base, we generate more than enough electricity for our use through roof top solar panels. At times, excess electricity is sold back to Duquesne Light through the net metering process. The funds that we save are used to provide crucial community services in the human services, education, and youth afterschool and summer programming fields. We strongly opposed the proposed changes to the PUC as such raises will limit our ability to generate solar power, and it will cost us money. This money will need to be taken from our ability to provide crucial community services to our small Borough that is certainly in need of this additional support.

Additionally, it is very confusing that in an age of "electricity deregulation" that the state is actually working to regulate the ability of small solar generators like us. This is not only inconsistent with the theories of deregulation, but it also amounts to a scenario where large electricity companies with much larger budgets face less scrutiny than smaller generators like ourselves. In closing, the proposed PA PUC changes are both unfair in their targeting of smaller electric generators like us, and should they pass they will have very real consequences for the brand new library in Millvale - a former Western Pennsylvania mill town that has weathered more than our fair share of economic and environmental disinvestment over the years. We request that you consider not changing the PUC rules. With utmost concern, Brian Wolovich President and Founder Millvale Community Library www.MillvaleLibrary.org

/s/

Mr. Brian Wolovich

Mr. Scott Wolovich
9675 Highland Rd
Pittsburgh, PA 15237

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We oppose the changes to PA's Net Metering rules that would upcharge customers with solar. This new fee would violate the AEPS guarantee that net metered customers receive the full retail rate for generation of their solar installation up to their annual usage. We also disagree with the proposed change in the new system size limit of 110% of the customers annual electric consumption. The proposed changes will effectively work to de-incentivize solar investment and adoption, at a time where it is becoming proven as a clean energy alternative. We appreciate your consideration of these comments as you evaluate your final proposed changes to the PA net metering laws.

/s/

Mr. Scott Wolovich

Mr. Phillip Wu
211 Grant Ave
Pittsburgh, PA 15209

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Putting limits on the amount of electricity that can be created on properties and sold back through the electric utility system from sustainable sources such as photovoltaic (solar) panels is the wrong way to go. This policy will make Pennsylvania an even less welcoming place for solar energy, as it prevents properties using solar power to offset the upfront costs involved with installing solar panels, hurting small businesses and homeowners. Power companies also won't benefit, as they will need to generate more electricity from their own facilities, which costs them money and prevents them from reaching emissions reduction goals. The changes to the Net Metering rules will be a lose-lose for everyone—for consumers, for the renewable energy providers, for the conventional power companies, and for the environment.

/s/

Mr. Phillip Wu

Ms. Jeaneen Zappa
Conservation Consultants Incorporated
64 S. 14th Street
Pittsburgh, PA 15203

August 28, 2014

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

As the Executive Director of a non-profit organization that supports Low Income Usage Reduction Programs (LIURP) for a variety of Western PA utilities, we are committed to energy conservation, responsible energy production of all forms, and smart use of the grid. We own our own building, which has 3 solar photovoltaic arrays plus a solar hot water system. We believe that ours was the first commercial building to net-meter in the Duquesne Light Service territory. We are strongly opposed to the changes in 75.13(k), 75.13(a)(3), and 75.12 that would give the Commission authority to allow utilities to charge a new special monthly fee to customers with solar, limit the size of solar arrays, change the definition of "utility" and –especially the requirement to have separate existing measurable load. The proposed legislation would be harmful to our small non-profit organization, would create a perceived liability to the market value of our largest asset – our 11,500 sf property, would generate an additional operating expense, and would run counter to the benefits of solar. We have worked very hard to benchmark our property using the EPA's Portfolio Manager software tool, which allows us to compare our performance against thousands of other similar commercial buildings across the country. Consistently, our 100+-year old building performs above the 95% efficiency rating. To be clear, the solar arrays only produce a fraction of our total power and only occasionally do we actually "net meter" (primarily on weekends.) As you can see, we have a strong interest in energy efficiency and in solar. We have actively held classes at our site to facilitate NABCEP certification for solar installers. Given our 20 years of experience in using solar and our ongoing, regular involvement with the region's solar market, we can perceive no benefit whatsoever, including the stated "improved clarification" for prospective solar owners. We urge the Public Utility Commission to re-consider this proposed rule and to eliminate the burdensome restrictions that it will introduce. We agree with the comments submitted by the Pennsylvania Net Metering Working Group. Thank you for your

consideration.

/s/

Ms. Jeaneen Zappa