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# REINFORD FARMS

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Dear PA Public Utility Commission,

I am writing this letter in response to the Docket No. L-2014-2404361 in reference to the Alternative Energy Portfolio Standards Act of 2004. Please consider my comments and suggestions as you make a final ruling.

First, I would like to say thank you for considering my previous comments and concerns regarding this ruling. Anaerobic digesters (AD) are great assets to many farms in this state and they are a great asset to the state of Pennsylvania for their environmental benefits and job generating capabilities. Without having regulation that supports ADs, these projects will not work. I am satisfied with the direction that the PUC is moving by allowing farmers to generate more than the 110 percent of their annual electric consumption. However, I do think that there needs to be clarification in the on current wording of the document.

My biggest concern with the current draft is the wording of 75.13 (a) (3) (IV). I think there needs to be more clarity on this statement. I suggest the statement should be change to read like this:

**(IV) THE 200% OF THE CUSTOMER-GENERATOR'S ANNUAL ELECTRIC CONSUMPTION LIMITATION ~~MAY~~ shall NOT APPLY TO ALTERNATIVE ENERGY SYSTEMS WHEN THE DEPARTMENT PROVIDES CONFIRMATION TO THE COMMISSION THAT A CUSTOMER-GENERATOR'S ALTERNATIVE ENERGY SYSTEM ~~IS USED TO~~ complies WITH THE DEPARTMENT'S PENNSYLVANIA CHESAPEAKE WATERSHED IMPLEMENTATION PLAN IN COMPLIANCE WITH SECTION 303 OF THE FEDERAL CLEAN WATER ACT AT 33 USC § 1313 OR IS AN INTEGRAL ELEMENT of a farm's approved Nutrient Management Plan in compliance FOR COMPLIANCE WITH THE NUTRIENT MANAGEMENT ACT AT 3 PA. C.S. §§ 501, ET SEQ.**

By writing the statement as suggested, it gives clarity to a subjective statement and would give farmers piece of mind when they are about to make a significant investment into an AD project.

Finally, I truly wonder why we would even want to cap any AD project at 200% of the customer-generators annual electric consumption regardless if the farm is in the Chesapeake watershed region or outside the region. AD projects are one of the most environmental friendly tools that farmers are now using. To put a cap on the amount of electricity they are able to sell back to the grid will most certainly discourage farmers in Pennsylvania that are out of the Chesapeake watershed region from installing an AD.

Again, thank you PA Public Utility Commission for drafting a resolution that is more favorable to AD projects. There is still room for improvement noting my suggestions above, but I feel that we are most certainly taking a step in the right direction that will ensure that AD projects will continue to be a part of Pennsylvania's bright energy independence future.

Sincerely,

  
Brett Reinford

Reinford Farms Inc.

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