



March 8<sup>th</sup>, 2010

To: Pennsylvania Public Utilities Commission  
From: Green Energy Capital Partners, LLC  
Attn: Secretary James J. McNulty

Dear Secretary McNulty,

Below are our comments relating to the policy statement dated February 6<sup>th</sup>, 2010

Comment # 1

To date two (2) Solar Renewable Energy Credit RFP's have been approved by the PUC. Both of these RFP's have a (10) year contract term. This firm ten (10) year contract term discriminates against solar projects that have obtained grants from the Alternative Energy Investment Act (AEI) administered by the Department of Community and Economic Development through the Commonwealth Financing Authority (CFA). Under a provision in the CFA Grants, if a Grantee enters into a SREC contract of 10 or more years must forfeit their grant. It is counter-intuitive to have the PA PUC approve RFP contract terms that restrict RFP participation of utility scale projects that have been awarded CFA grants. The CFA grants and long term contracts are necessary to build Utility scale projects that are grid interconnected. Significant additional capital investment in substation and transmission lines are required, which projects that utilize a Power Purchase agreement and or rooftop behind-the-meter systems don't have to make. In addition, Utility scale grid tied systems also sell power generated at wholesale vs. retail rates. CFA Grantees would welcome contracts with a nine (9) year term.

## **Turnkey Renewable Energy Project Development**

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Comment #2

The Electric Distribution Companies (EDC's) should be encouraged to enter into bilateral agreements of utility scale solar projects with flexible contract terms. Additionally, the EDC's should be assured that there is no turning back and that as long as the bilateral agreement is sanctioned by the PUC, there will be rate recovery for the duration of the contract.

Comment #3

RFP's should be considered specifically for Utility Scale Solar plants that are grid interconnected to PJM, due to the long development cycle associated with PJM Interconnection. These RFP's should also have an operational date that is within twenty four (24) months vs. the current twelve (12) month operational deadline.

Best Regards,

John Curtis  
Founder and CEO

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