



Mid-Atlantic Green Builders, LLC

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May 27, 2014

Commissioners
Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
PO Box 3265
Harrisburg, Pa. 17105-3265

P-2014-2420902

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SECRETARY'S BUREAU

Dear Commissioners:

I am a Pennsylvania small businessman and owner of a PV Solar construction company currently doing business in Central Pa. In the past 5 years we were involved with the installation and operation of a two megawatt PV Solar facility, currently operating in Dauphin County. We worked with the development, construction, and interconnection of the facility to the PPL grid network. We worked in cooperation with PPL to build and operate the facility within all applicable Pennsylvania Electric Codes. We worked equally hard to insure that all interconnection agreements and procedures were followed as directed and engineered by PPL. This project is fiscally designed and installed as a "customer generator, net metering" application. To qualify as a "net metering" facility, the project had to meet criteria. First, it had to be owner operated. Second, it needed to have an onsite offset load that was independent of the required load necessary to operate and monitor the solar field. Following this design, the excess energy was purchased by PPL according to the "net metering tariff program", and the project was able to meet its debt service.

Within the past two years we were able to secure a new PV Solar project. The project, listed as "Lykens project", was designed and presented as a "customer owner generator, net metering facility". When we began working with PPL on the applications for interconnection, net metering, and new service, we designed the facility and the PPL requirements into the project and ultimately into the customer's financial model. First, this project is designed to be owned and operated by our company. Second, it will be individually metered through a new service account. Third, it will have an offset electrical load that is twice the size of previous designs. By following and exceeding the previously documented rules and standards for net metering, we attempted to be more than just accommodating and compliant. I worked with PPL customer service to insure that the non-generating load would be more than adequate for this application.

We had already received PPL work order numbers for the "Lykens project" and a PPL engineer was previously assigned. Until May 10, when I received a copy of the Docket No. P-2014-2420902, regarding the petition from PPL asking to resolve uncertainty as to whether our project met "net metering" qualifications, we were proceeding with funding and pre-engineering and design work.

Commissioners

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The success of this project and any of our future PV Solar projects will hinge financially on your determination regarding the "net metering" policy that was already in place and working. In addition, please understand that the general program for independent PV Solar power generation is also already in place and working. This program encourages businesses, farms, landowners, etc. to make a business decision to help our country, state, county and communities by self-generating PV Solar power - not just for their use, but for the benefit of others. To change this revenue opportunity will push back those efforts.

Please consider the "net metering" criteria already in place as a working model for current and future projects. PPL has asked for a determination on uncertainty that I believe has already been resolved and is already in practice. Please keep our businesses in mind when ruling on this item. To allow PPL or any utility to determine the qualifications for paying earned revenue without agreement from the customer generator would be a great deterrent to small businesses like mine.

Sincerely,

A handwritten signature in black ink that reads "William Napikoski". The signature is written in a cursive style with a large, prominent "W" and "N".

William Napikoski



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P.U.C. BUREAU

2014 MAY 29 AM 10:35

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Attn: Rosemary Chiavetta, Secretary