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August 22, 2014

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Pennsylvania Public Utility Commission
Attn: Secretary
P.O. Box 3625
Harrisburg, PA 17105-3265

PA P.U.C.
SECRETARY'S BUREAU

THE
ESTATE
SECURITY
FORMULA™

Re: Doc. No. L-2014-2404361

Gary L. James
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Dear Commission Members:

I write as the owner of a 49.6 kW solar system installed in July 2011 at my farm in Grantville, PA. I am a customer of Met-Ed, not by choice but as mandated by the PUC. I thought you might like the perspective of how electric utilities countenance solar system owners as part of their network.

I won't pretend to understand the substantive provisions of the proposed Regulations but I presume them to usher in further restrictions on the use of solar power in Pennsylvania. While it's no secret that Governor Corbett is a paid apologist for the natural gas and oil industry in Pennsylvania, I do find it alarming that the PUC would assist electric utilities in further restrictions on the use of the only available and viable clean power source (at least the only one affordable to most citizens).

For the first approximately 18 months after installation of my system, Met-Ed sent monthly bills for my house (host account), barn and apartment connected to the barn. Graciously, Met-Ed allowed excess production from the host account to be applied to the subaccounts for the barn and apartment. The record keeping and reporting associated with such production, however, was troubling—each month my host bill was manually edited with white-out and the insertion of hand-written numbers. I found it incredible that in 2011-2013 Met-Ed lacked the electronic capacity to compute and report my net solar production, which in turn led me to question the accuracy of such information (after all, errors are more likely to occur if the entry is made manually instead of electronically). For many of the first 19 months I had to call Met-Ed for an explanation of how the banked solar hours had been computed—this process typically entailed over one hour on the telephone: first waiting for a representative, then being informed that my inquiry had to be transferred to commercial accounts (of course there was no direct dial for commercial accounts), then waiting for a connection with commercial accounts, and then speaking with a commercial representative who, on more than one occasion, informed me that the information provided by the Met-Ed representative in my previous call was incorrect and that I should disregard it. I understand that Met-Ed is a large utility and must address the needs of many customers with varying needs; what I didn't and still don't understand is how Met-Ed and presumably other electric providers operating in PA can so easily dismiss the complaints of solar customers as if the information provided by the utility is flawless and my right to lodge a complaint doesn't exist. This from a company that used white-out and hand-written entries on its bills!!

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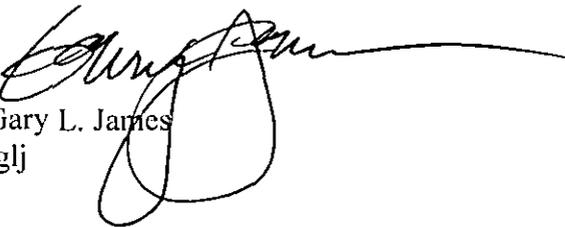
Of greater concern to me was the first mandatory “truing-up” of my solar account in June 2012 and each June thereafter, the process by which Met-Ed pays for all of my accrued and banked hours of production. Part of my objective in installing a solar system was to create a hedge against rising electric rates by banking the maximum number of hours and using them throughout the year. When I inquired at Met-Ed, I was informed that the PUC authorized electric companies to wipe off banked solar hours each year by paying the customer for them. Once again, the game was rigged by the electric companies acting through the PUC long before anyone experienced the consequences of highly technical regulations such as the one that is the subject of this letter.

Will the PUC ever stand up to the electric utilities and do something to promote solar production? I find it troubling that while extolling the efficacy of solar power the electric companies act through the PUC to regulate installation and operation of systems in a way that causes no economic harm to the utilities but imposes further restrictions and costs on the consumer. Translation: it is the consumer who pays the price for being socially responsible and seeking sources of clean energy.

I doubt that this letter will be read, much less considered in the process of the PUC rubber-stamping regulations produced by lobbyists for the utilities. I recognize that’s the political process in the United States, one that results in consumers, notwithstanding a consumer representative at the PUC whose duty it is to see that utilities impose rate increases equitably among all users, usually getting the short end of the stick. Nonetheless, I thought you might like to know what dealing with utilities is like out here in the trenches. Thank you.

Sincerely,

JSDC LAW OFFICES



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