



**CHESAPEAKE BAY FOUNDATION**  
*Saving a National Treasure*

September 3, 2014

Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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SECRETARY'S BUREAU

**RE: Docket L-2014-2404361; Proposed Net Metering Changes**

Dear Commissioners:

On behalf of the Chesapeake Bay Foundation, Inc. (CBF), please accept our comments regarding the Public Utility Commission's proposed net metering changes detailed in Docket L-2014-2404361.

CBF is a 501(c)(3) Maryland based organization with offices in Annapolis and Easton, Maryland; Harrisburg, Pennsylvania; Richmond and Norfolk Virginia and the District of Columbia. With over 200,000 members, CBF is the largest conservation organization dedicated solely to protecting the Chesapeake Bay watershed, the Chesapeake Bay itself, and its tributaries.

Specifically, we have concerns regarding the requirement that alternative energy system must be sized to generate no more than 110% of the customer-generator's annual electric consumption at the interconnection meter location when combined with all qualifying virtual meter aggregation locations. We believe this requirement, in particular, will limit the amount of energy sold from onsite energy producing projects, such as anaerobic manure digesters, and thus will inhibit further digester implementation on farms needing manure management techniques.

Anaerobic digesters are an important tool that farms use to improve economic viability while reducing water pollution, by concentrating and stabilizing nitrogen and phosphorus so they may be better managed. Because of these water quality benefits, the Commonwealth of Pennsylvania includes increased adoption of anaerobic digesters, amongst a large number other pollution reduction practices, to meet Pennsylvania's Chesapeake Watershed Implementation Plan (WIP) goals to reduce nitrogen and phosphorus pollution to local waters and the Chesapeake Bay.

When designing an anaerobic digester, a farm operation sizes it according to the amount of manure produced currently or with projected expansion, often beyond the energy needs of the

farm operation. The "sale" of this excess energy through net metering offsets some of the financial commitment farms make in the construction and operation of a digestion.

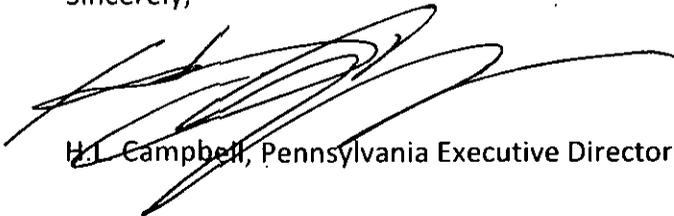
This proposed rulemaking may notably reduce the further development of anaerobic digesters on Pennsylvania farms. This would be detrimental to the farms' ability to manage livestock production *in an environmentally sound and economically feasible manner*.

The environmental benefits from anaerobic digesters are not limited to water quality, digesters also facilitate pathogen destruction, odor control, and greenhouse gas and hydrogen sulfide emission reductions. They also offset the environmental impacts of fossil fuel generation and can provide additional rural electrical benefits, such as renewable energy, distributed generation, and voltage support.

Therefore, the Chesapeake Bay Foundation recommends that the Pennsylvania Utility Commission provide an exemption in Section 75.13(a)(3) for facilities that provide measurable and verifiable environmental benefits, including nutrient reductions to meet water quality goals to meet Pennsylvania's Chesapeake Watershed Implementation Plan.

Thank you for your consideration of these comments. Please feel free to contact us if you have any questions or concerns.

Sincerely,



H.L. Campbell, Pennsylvania Executive Director

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