



Robert Altenburg  
Citizens for Pennsylvania's Future  
610 N. Third St.  
Harrisburg, PA 17101-1113

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Please accept these comments submitted on behalf of energy professionals, business entities that own solar, and concerned representatives of Pennsylvania's non-profit sector.

Sincerely,

A handwritten signature in black ink that reads "Robert C. Altenburg".

Robert C. Altenburg (ID #: 209540)  
Citizens for Pennsylvania's Future  
Ph: 717.214.7933  
altenburg@pennfuture.org

Michael Lebo  
Electrical Designer/Solar Installer  
Edwin L. Heim Co.  
1918 Greenwood St  
Harrisburg, PA 17104

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

1. We oppose the changes in §75.13(k) that would give the Commission authority to allow utilities to charge any new fees that aren't also levied upon non-net metered customers. We believe levying these fees would violate the AEPS guarantee that net metered customers receive the full retail rate for all generation of their solar installation up to their annual usage. Moreover, the proposed change fails to provide any basis for determining this fee. If there is to be a fee, it should be based on a full cost of service study that evaluates both the costs and the benefits of each specific net metered system.
2. We believe the proposed new definition for "utility" §75.1 continues to be overly broad and threaten the third-party ownership model for solar and other distributed generation which the Commission has approved in prior dockets. While the discussion section of the Final Rulemaking Order (page 8) indicates that changes have been proposed intended to exclude persons or entities that own or operate alternative energy systems that are clearly not merchant generators, the proposed changes do not go far enough to explicitly allow for third party owned systems. In the case of solar energy there are models that have been explicitly approved by the PUC [ See Use of Third Party Operators, Final Order at Docket No. M 2011 2249441 (entered March 29, 2012)], that broker leasing or power purchase agreements to host customers. Via this proposed definition revision, those entities do provide electric generation services, and could be considered a utility under this rule.
3. We disagree with the proposed change in §75.13(a)(3) for the new system size limit of 200% of the customer-generator's annual electric consumption. While the original proposed limit was lower at 110% of annual electric consumption, there is no statutory authority in the AEPS Act for any percentage limit. There is already an existing system capacity limit of 50 kW for residential systems and 3 (or 5) MW for nonresidential systems. The additional size limit is redundant and only adds more uncertainty and regulatory compliance costs, which will ultimately be paid by all ratepayers. The AEPS statute

creates an environment where there is no incentive to over-size systems since any annual surplus of production does not receive net metering treatment and is compensated at the lower price-to-compare rate. Thus, sizing a system to overproduce on an annual basis does not make economic sense which further shows that additional system size restrictions are simply unnecessary.

This proposed rule change is offered as a method to prevent merchant generators from masquerading as net metered customer generators. The coalition views the incidences of net metered customers generators masquerading as customer generators as extremely rare. Those few cases where there is clear intent in the project proposal to take advantage of net metering rights as a means to provide merchant generator services at greater profit, can be dealt with on a case by case basis with greater efficiency for all parties. Applying these burdensome and costly limitations to the entire distributed energy industry remains an unnecessary step.

4. We oppose the proposed change in §75.12 to the definition of “virtual meter aggregation” that adds a requirement that all service locations must have separate existing measurable load. It should be sufficient that the customer-generator have measurable electric load, not that each meter of the customer-generator have measurable load. This proposed change would prevent appropriate sighting for virtual net metered systems as it requires systems to be installed in proximity to customer-generator’s existing meters that have a measurable load. This violates the AEPS legislation’s intent to promote new clean distributed generation.

5. We do not support the proposed deletion in 75.51(c) of the Commission ability to appoint a technical master to assist in the resolution of any disputes under the interconnection application/review process. We understand the Commission has not made use of its power to appoint a technical master, but nevertheless see no reason to cancel this authority. We are particularly concerned that residential customers and small business are already at a disadvantage when faced with disputes regarding the technical application of the regulations and, with increasing complexity, this is expected to continue. For this reason, it is premature to delete the provisions.

/s/

Michael Lebo

Anthony Cotton  
Founder  
Energy Conscious LLC  
410 Sumner Way  
West Chester, PA 19382

May 29, 2015

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Dear Ms. Chiavetta

If trying to promote electric vehicles, they need to be considered in the rule making. There are already self-correcting measures against generation not targeted at specific customer load such as 50kW cap and pricing of excess production. The latter can accommodate the addition of an EV without any extra process. For the 200% limit it will be challenge to get copies of customers current bills let alone prior years to look for highest consumption. For new properties the justification of projected load is that much more difficult.

/s/

Anthony Cotton

Michael Shadow  
Pres  
sundirected  
136 E High St  
Bellefonte, PA 16823

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The 200% rule would increase the time it takes us to assess a customer's electric bills by an estimated 700%. We also have many residential customers that do not keep their utility bills past the previous month. This would require additional time and resources spent by both us and our prospects to do an accurate analysis of their utility bills for systems. A net metering fee would be a detriment to existing customers as well as prospective customers. I also feel that enabling fees like this would place an increased burden on our workforce because of people deciding to disconnect from the grid entirely and rely on battery based systems for their electricity needs.

/s/

Michael Shadow

Brent Groce  
Operations Manager  
Solar States  
1400 N. American St., Suite 401  
Philadelphia, PA 19122

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Please support the \*expansion\* of renewable energy development through actions that show that we care about the environment and energy independence. Do not hamper\* RE deployment through additional hurdles in cost and paperwork that will continue the trend of PA falling behind other states, especially neighboring states that are embracing RE. In Pennsylvania we, as solar installers, are already faced with a challenging environment. There are no state-level incentives, the RPS for solar is quite low, Renewable Energy Certificate prices are low, etc. There has been little leadership for renewable energy development from the state government to encourage clean energy deployment. While we hope this is changing, the additional burden of explaining to potential customers that there are limits on the amount of solar they can install is going to be difficult. At a minimum it will add time explaining to customers and more effort in determining and proving current use in interconnection application filings. While this 200% limit will change little in terms of the size systems we sell – most people only want to cover what they are using – it will add time and cost because it is an unnecessary step/constraint. Similarly to the above requirement, we are already having to work incredibly hard to sell solar in the PA market. Every additional cost to the customer or application/bureaucracy step for us, will make this job more difficult. And it will result in less renewable energy being installed in PA.

/s/

Brent Groce

Mark Bortman  
owner  
Exact Solar  
1655 Fairfield Rd  
Yardley,, PA 19067

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Additional burdens for paperwork and processing will negatively affect our abilities to provide services for our customers. The PUC should be making things easier for customers to transition to renewable energy, not hindering the process. As an emerging technology, any additional costs would be an obstacle to customers interested in switching to renewable energy. The benefits of solar and other renewable energy sources far outweigh the costs.

/s/

Mark Bortman

Dara Bortman  
VP Marketing/Sales  
Exact Solar  
1655 Fairfield Rd  
Yardley,, PA 19067

May 29, 2015

Pennsylvania Public Utility Commission  
Attn: Secretary  
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Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The proposed rule changes surrounding virtual net metering are extraneous and unnecessary. If a customer has a verified load to offset, and has a property with multiple meters, virtual net metering allows us to place panels in the most advantageous, economical, sometimes centralized space, while offsetting usage across the entire property. There is no justifiable reason to disallow this practice when the customer has a verified load to offset. The existing size limit is already sufficient in limiting size of systems installed. Usage changes from year to year and new residents of existing or new properties may not have an exact idea of upcoming usage. The proposed 200% limit is unnecessary and could add significant time when estimating future usage at new properties or existing properties undergoing renovations or improvements. The addition of fees is the single largest change to the net metering rules that could affect our business. A fee, or even the potential for a fee, would make it difficult, if not impossible for us to estimate future savings or ROI for proposed solar projects of all sizes. It would make selling solar projects of all sizes and for all markets, residential and commercial, much more difficult, ensuring that PA will not be a leader in moving us toward an “all of the above” energy future.

/s/

Dara Bortman

Joel Plotkin  
Energy coordinator, Hundredfold Farm Cohousing  
Hundredfold Farm Community Owners Association  
1400 Evergreen Way  
Orrtanna,, PA 17353

May 29, 2015

Pennsylvania Public Utility Commission  
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Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The Core Coalition comments are ones we endorse. Raising the required percentage of renewable sources for PA would also assist us and the nation in drastically reducing our climate impact. We are ten homeowners in south Central PA with an average of 3.3kW Solar PV systems. It is unlikely any of us would exceed the 200% limit, but we object to this kind of restriction that discourages the use of residential solar generation. We endorse the PennFuture statement on this matter. All our homeowners pay a monthly connection fee to our REA Coop, Adams Electric. We have paid to install expensive equipment to protect line workers during power outages. We are saving money for our fellow coop members who have to purchase less power generation because of our modest contribution (2.5–4.5 mWH per month) to the grid

/s/

Joel Plotkin

Christopher Mejia  
President  
Consolidated Solar LLC  
PO Box 72  
East Petersburg, PA 17520

May 29, 2015

Pennsylvania Public Utility Commission  
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P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

This rule (200%) would add time to the sales process, costing us more money. If a fee was added we would expect to see a decline in business, to the extent we may have to cut staff.

/s/

Christopher Mejia

peter Mayes  
Research Scientist  
Slaton Solar  
418 anthwyn road  
Narberth., PA 19072

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/s/

peter Mayes

William Fitch  
owner  
fitch consulting  
1072 fowlersville rd  
Berwick, PA 18603

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

General comment. Any additions/changes that “target” solar customers through whatever mechanism for higher fees should be banned. Solar PV generation is just a way for a customer to reduce his/her electric bill. The transformer on a customers pole cannot distinguish electrons generated by PV vs any other source, and is ubiquitous regarding direction on transformer wear and tear. Utilities are faced with ever increasing demand destruction. However they have benefited from putting off infrastructure upgrades due to production being delivered at the load through distributed generation. That off loading has avoided cost value for them. New models must be created that do not inhibit RE production, allowing the carbon to stay in the ground where IT NEEDS TO BE KEPT!! The core comments below are fair concerns. Expand RE generation. DO not inhibit. Again, fees targeted towards RE generators is backwards to where we need to go as a world. All changes that trend in this direction are there only to feed the entrenched interests that feel protected by their wealth from planetary changes. Is this direction really the way we want to subscribe too?? Any fees targeted at end customers of RE generation is not moving in a direction that spawns growth for RE.

/s/

William Fitch

Ben Fetrow  
Senior Field Energy Consultant  
Solar  
336 Clubhouse Road  
Hunt Valley, MD 21031

May 29, 2015

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Dear Ms. Chiavetta

As long as ALL utility customers were charged a fee, not just solar. The market should be fair across the board and not discriminate for solar usage.

/s/

Ben Fetrow

Deborah Rush  
President  
Two Disters' Farm  
400 Fairview Rd.  
Coatesville, PA 19320

May 29, 2015

Pennsylvania Public Utility Commission  
Attn: Secretary  
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Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Both the added expense and paperwork would put an unwanted and unfair burden on my farm. We installed solar not only to make a difference but to cut costs. As yet, we have not recouped the money spent on the system and further costs are going to make that repayment almost impossible. Furthermore, the utilities extra charges are unwarranted, especially as my solar power gives them green energy that they can use to meet their requirements. The cost of doing buisness in this state and especially this school district are very high. As stated previously, the solar system is meant to repay the installation costs, yet more fees will delay this further. The fees proposed would also diminish the fiscal benefit of haveing my solar system and add a further financial burden that customers outside the solar producers do not have.

/s/

Deborah Rush

Douglas Nadel  
none  
1648 Cloverly Lane  
Rydal, PA 19046

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We need to encourage MORE use of renewable energies, not less. Homeowners who have installed solar panels are putting their money where their mouths are and should be rewarded, not penalized. We all need to do our share to protect the planet.

/s/

Douglas Nadel

Judith Kenney  
Martin Kenney  
150 Grubb Rd  
Malvern,, Pa 19355

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

We installed solar in doing our part for the environment. In Pennsylvania we have been thrown around and taken advantage of. Peco is not happy with us supplying extra power and to add additional fees would be disastrous. Unless you want people to stop conserving and contributing to helping the planet then help us to install more solar not discourage us from doing so. We installed solar in doing our part for the environment. In Pennsylvania we have been thrown around and taken advantage of. Peco is not happy with us supplying extra power and to add additional fees would be disastrous. Unless you want people to stop conserving and contributing to helping the planet then help us to install more solar not discourage us from doing so.

/s/

Judith Kenney

charles reichner  
consultant  
Evoke Solar  
Leithsville road  
Hellertown, PA 18055

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

Solar is one form of energy production that is in its beginning stages and needs to be encouraged not punished so it can contribute to the mix of energy production already in place. There is already a 50 KW limit on Residential and a 3-4 MW limit on commercial. There is no economic incentive to go larger than your usage as you only get the price to compare. People might want to go larger to accommodate future expansions of electrical usage such as heat AC and electric cars. A fee would add to an already negative message of cost and benefits. Decentralized power generation save making new power lines(always opposed) and only send excess to your neighbors demand for power. Also many of the electric power lines were constructed through Rural Electrification because the utilities would not make the investment in new power lines.

/s/

charles reichner

Greg Winks  
President  
Clean Energy Resources, LLC  
2400 Oxford Drive, Box 113  
Bethel Park, PA 15102

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The proposed new definition of “utility” is way too broad and discourages third party investment and ownership for solar. This will seriously impact municipal and institutional growth in solar as these groups regularly turn to third party investment to fund solar, in lieu of passing on development costs to taxpayers or students.

Net-metering rules should also be changed to allow for multiple owners with shared solar projects, thus providing the opportunity for those currently unable to participate in solar energy to enjoy the benefits of the cost reduction on their electric bill derived from participating in a shared solar installation. The 200% rule would pose as a serious threat to my client base, which is primarily municipal, institutional, and commercial. The proposed rule would discourage any future energy efficiency initiatives.

It would also impact any forward planning with a solar installation that might be temporarily over-sized, but economically the right strategy to implement in anticipation of new energy loads coming on line.

/s/

Greg Winks

Fred Kraybill  
Manager  
Thomas Blvd Group  
7211 Thomas Blvd  
, PA 15208

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

I believe that electric utilities can both make a reasonable profit and at the same time provide affordable, reliable, and clean energy. The PUC can help immensely with this endeavor. If solar homeowners use the grid then they should pay the same base rate everyone else pays. If someone helps the environment by cutting their electrical consumption by efficiency or by installing solar we should not try to charge them extra for doing the right thing in cutting carbon pollution. Make one fair monthly price that everyone pays for using the grid but also leave plenty of financial incentive for people to reduce their electric consumption so that we can make progress on reducing carbon pollution. Let's make clean energy a priority at the PUC instead of discouraging it by constantly changing the rules! If properly managed the utility would be able to absorb the limited amount of solar and wind energy coming on line without any additional fees being imposed.

Adding additional costs to my clients electricity bills is counterproductive and discouraging for initiatives to reduce energy consumption from the grid.

As someone who works primarily in the larger scale solar installation customer market, any efforts to discourage efforts to reduce energy demand adds a burden to management of the PJM grid.

/s/

Fred Kraybill

Joe Morinville  
President  
Energy Independent Solutions  
535 Clever Road  
McKees Rocks, PA 15136

May 29, 2015

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

Re: Docket No. L-2014-2404361

Dear Ms. Chiavetta

The 200% rule is unenforceable in most cases as there is no way to determine how moving from gas heat to electric heat, or the addition of an electric car, or the reduction in energy consumption from efficiency improvements etc, will affect the bill or consumption over the long term. This leaves a wide are of ambiguity in the enforcement of this provision which will be impossible for any company to comply with. We feel this will lead to excessive compliance paperwork, increasing the cost of doing business and ultimately costing tax payers and rate payers more money. Net metering fees would have a dramatic negative impact on my business.

Energy Independent Solutions (EIS Solar) employs 15 full time PA employees all of which are directly involved in the sales, construction or support of solar installations within the state of PA. All of which make 2-5X the minimum wage, have full benefits and year round employment.

As a company, we have barely survived the Corbett administrations war on solar energy in PA and though we are still standing, the industry is less than half what it was when he took office. Adding additional fees to net metering would further slow our sales and likely force us to lay off additional workers.

These fees are unnecessary as solar does not cost the utilities money, it saves them money by giving them peak energy during the heat of the day in exchange for off peak night time energy. Adding a fee to give the utilities the benefit of the power makes no sense.

I recommend you implement Time of Use (TOU) pricing on all traditional and Net meters, charging everyone based on the real market cost of the energy they consume based on the time they consume it and paying them based on when they produce it. This would protect the utility, allowing them to recover from peak costs more easily while adequately compensating solar generators for the high value peak energy they now give free to the

utility.

/s/

Joe Morinville

Jack Barnett  
President  
Clean Energy Co-op Inc.  
1030 Main Street  
Honesdale, PA 18431

May 29, 2015

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P.O. Box 3265  
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Dear Ms. Chiavetta

The limitations being imposed on virtual net-metering are also potentially detrimental to our business. If anything, we need to expand virtual net-metering so that more people (e.g. apartment dwellers, those with shading or orientation siting issues) can access renewable and clean energy for themselves, by investing in a common community generation system. The 200% limitation is not unreasonable, but the procedures by which this is implemented are the most concerning, as the generating system owner may be changing their load in the future (e.g. buying an EV) and therefore this should not be used to prevent owners from buying renewable energy systems. Perhaps a better way instead is to limit the amount of cash that can be returned to the owner when credits are refunded in the spring?

/s/

Jack Barnett