



January 25, 2018

Secretary of PA Public Utility Commission
P O Box 3265
Harrisburg, PA 17105-3265

Re: Docket #M-2017-2631527

Dear Secretary,

I am writing to you concerning the implementation of Act 40 that Gov. Wolf signed into law on October 30, 2017, which included a provision to close the borders to solar systems being certified in PA that are not geographically located within the state borders.

It is clear out-of-state systems have caused a massive over-supply in the PA SREC market and severely depressed their value. Act 40's intent was to correct this issue but apparently it did not completely clarify how systems already constructed outside the state and registered in PA would be handled.

We are asking for the PUC to accurately interpret the new law as the general assembly intended and not to grandfather off of other states systems/SRECs.

It is very important that all out of state systems be excluded from the PA market, no matter when they were constructed. The Chairman and Vice-Chairman of the PUC have issued a Tentative Implementation Order (TIO) recommending that out-of-state systems previously certified as Tier I solar generation facilities would not be grandfathered in under this new law. We applaud this recommendation, since grandfathering in all of the out-of-state systems already certified in PA would result in little, or no effect on the value of SREC's and would render the new law meaningless.

We think this new law could have a very positive impact on renewable energy deployment in PA and the jobs associated with it. Most of our neighboring states have long had closed borders, and as a result have a healthier and more sustainable solar energy market. It really does not make sense for large solar systems being installed in other state, to completely destroy the PA SREC market and limit the opportunities for solar arrays and solar related jobs in PA.

It only makes sense to have PA based systems meeting the requirements of the renewable portfolio standard of PA. In conclusion we ask the PUC to enact the Chairman and Vice-Chairman's TIO as the permanent interpretation and implementation of Act 40.

Thank you for your consideration and for giving us the opportunity to comment.

Respectfully Submitted,

Jeff Kahler

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