

**Mark J. Connolly PE**  
50 Broadwater Lane Phoenixville, PA 19460  
610-952-1285  
[markjconnolly@gmail.com](mailto:markjconnolly@gmail.com)

---

Pennsylvania Public Utility Commission,  
Post Office Box 3265  
Harrisburg, PA 17105-3265

Subject: Referencing docket number M-2017-2631527  
Interpretation to actually close the border and support solar projects located in PA

Dear PUC:

I am a PA resident, a Professional Engineer and NABCEP Certified Solar PV Installation Professional. I have been working in the PA energy industry and installing solar since 2006. This industry needs the AEPS and SREC market to work as intended. Recently the Pennsylvania General Assembly and Governor Wolf enacted into law the solar provisions of Act 40 that essentially "closed the border" of the solar renewable energy credit (SREC) market to allow only Pennsylvania-located solar systems to qualify and to sell SRECs into the Pennsylvania market.

Now we need the Pennsylvania Public Utility Commission to correctly interpret the law so that the borders are really closed and the AEPS works as intended like in other states. The oversupply of SRECS has caused the solar market to collapse and the incentives, paid with PA customer dollars, have been paid to projects outside the State. Act 40 intended to "close" the solar renewable energy credit (SREC) "border" by permitting only in-state solar systems to qualify for Pennsylvania's SRECs.

The interpretation Section 2804(2)(i) of Act 40 set forth in the Commission's Tentative Implementation Order (TIO) is contrary to the Act's intent, and would renders the Act ineffective. The interpretation of Act 40 by Chairman Gladys Brown and VP Andrew Place, correctly prohibits the sale of all banked Pennsylvania SRECs from out-of-state solar systems after October 30, 2017 to meet AEPS compliance.

This interpretation implementing Act 40 as intended needs to include the following:

- Require the certification to have certification mean in state locations.
- Disallowing banking of SRECS from out of state projects.
- Binding Written contract to mean with the purchaser of the SRECS only.

Thank you for correctly for interpreting the intent of Act 40 to make the SREC market working to support the PA in-state solar market.

Sincerely,



Mark J. Connolly PE