

Feb. 5, 2018

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

RE: Implementation of Act 40 of 2017 (Docket #M-2017-2631527)

Dear Members of the Commission:

Pennsylvania Farm Bureau (PFB) is pleased to offer its comments on the Pennsylvania Public Utility Commission's (PUC) Tentative Implementation Order (TIO) regarding the implementation of Act 40 of 2017, which amends the Pennsylvania Administrative Code to establish geographical limits on solar photovoltaic (solar PV) systems that qualify for the solar PV share requirement of the state's Alternative Energy Portfolio Standards (AEPS) Act, as well as the accompanying Joint Statement by PUC Chair Gladys Brown and Vice Chair Andrew Place.

PFB is a general farm organization, made up of more than 60,000 members. Since 1950, PFB has provided support, advocacy and informational and professional services for agriculture and farm families, including those who have invested in and operate solar energy systems on their property. These systems are very often operated on more concentrated farming operations, and are developed and operated as an integral part of the farm's plan to meet the environmental standards imposed under state and federal law.

At the same time, it is important to note that farmers must incur high input and operation costs to viably engage their farms in agricultural production, and development and maintenance of solar energy systems can require farmers to make significant capital outlays and incur debt. Therefore, while the income derived from solar energy systems is merely part of the income and cost factors faced by a farmer in managing his farm as a single business unit, continuing to allow the sale of solar renewal energy credits (SRECs) into Pennsylvania from other states (whether via "grandfathering" of existing out-of-state certified facilities or through the ongoing sale of "banked" out-of-state SRECs) undermines the economic viability of projects that have already been developed; discourages future investment by farmers (and others) in additional Pennsylvania solar facilities; and consequently limits farmers' options for compliance with ever-increasing environmental protection standards.

Pennsylvania's farmers take pride in being good stewards of their land and seek to leave a legacy of environmental improvement for future generations. We respectfully request that the PUC, in moving forward with its decision on the implementation of Act 40, assist PFB's members as they endeavor to meet that worthy goal by closing the Commonwealth's borders to outside SRECs. Thank you very much for the opportunity to comment on this important issue.

Sincerely,



Grant R. Gulibon,  
Director, Regulatory Affairs