

LCSWMA

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Date: December 18, 2025

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Comments on PPL Electric Rate Case – Docket No. R-2025-3057164
Opposition to Proposed Net Metering Changes**

Dear Commissioners:

I am writing to provide comment on PPL Electric's proposed rate case R-2025-3057164, specifically regarding the proposed changes to net metering compensation that would significantly impact renewable energy customer-generators across Pennsylvania.

Impact on Frey Farm Landfill Project

The Frey Farm landfill renewable energy project in Lancaster County, Pennsylvania, has successfully operated for over a decade under PPL's net metering program. This project exemplifies how landfill gas-to-energy facilities provide substantial environmental and community benefits by capturing methane emissions and converting them into clean, renewable electricity. The proposed rate changes would fundamentally undermine the economics of this project and similar renewable energy facilities throughout PPL's service territory.

Key Concerns with Proposed Changes

1. Compensation Structure

PPL proposes shifting exported electricity compensation from retail net metering rates to wholesale market rates (PJM hourly LMP). This change could reduce project revenues by more than 50%, threatening the financial viability of existing renewable energy investments made in good faith under current tariff rules.

2. Reclassification of Customer-Generators

The proposed redefinition of maximum registered peak load would reclassify most projects above 100 kW as large generators, removing them from retail credit eligibility. This arbitrary threshold lacks technical justification and discriminates against mid-scale renewable projects.

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3. Mandatory AEC Transfer Without Compensation

PPL's proposed tariff language mandates that customer-generators transfer all Alternative Energy Credits (AECs) to PPL without compensation. This provision directly conflicts with Pennsylvania's Alternative Energy Portfolio Standards (AEPS) Act, which establishes that customer-generators retain ownership of their AECs unless they voluntarily transfer them. Requiring uncompensated AEC transfer compounds the revenue erosion from rate reclassification and represents an improper taking of renewable energy attributes.

Request for Commission Action

We respectfully request that the Commission:

- Reject the proposed shift from retail to wholesale compensation for customer-generator exports
- Maintain existing net metering structure for projects operating under current tariffs
- Reject mandatory AEC transfer provisions as inconsistent with Pennsylvania AEPS regulations
- Ensure any rate modifications preserve the economic viability of renewable energy investments

Renewable energy projects like Frey Farm represent significant capital investments made based on existing regulatory frameworks. Retroactive changes to compensation structures would undermine investor confidence in Pennsylvania's renewable energy markets and contradict the Commonwealth's clean energy goals.

The Commission has a responsibility to balance utility cost recovery with the Commonwealth's clean energy policies and the reasonable expectations of investors and customer-generators. PPL's proposed changes fail this test and should be rejected.

Thank you for your consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Youngs", written in a cursive style.

Daniel G. Youngs
Executive Director, LCSWMA

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