



Chesapeake Bay Commission
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Wendell F. Holland, Chairman
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

February 2, 2005

RE: Small Generation Interconnection Standards and Procedures ANPR; Doc. No. L00040168

Dear Chairman Holland:

On behalf of the Pennsylvania Delegation of the Chesapeake Bay Commission (CBC), thank you for the opportunity to comment on the proposed rulemaking regarding small generation interconnection standards and procedures. The CBC is a tri-state commission consisting of state legislators from Pennsylvania, Maryland, and Virginia. Additional members include representatives of the states' natural resources agencies and the public. The purpose of the CBC is to share information regarding issues of Bay-wide concern and advise our respective state legislatures.

As a tri-state organization, the CBC is uniquely positioned among government entities to address the regional complexities of Chesapeake Bay restoration. For years, the CBC has wrestled with the challenges of a growing population, a changing agriculture industry, and the health of the Chesapeake and the multi-state economy that relies on it.

Fortunately, there are new technologies available to help us meet a need across the watershed to provide a clean source of energy to a growing population and to alleviate the challenge of farm animal waste in a declining agricultural land base. We are now presented with an opportunity to view animal manure not as a waste, but as a resource with great potential.

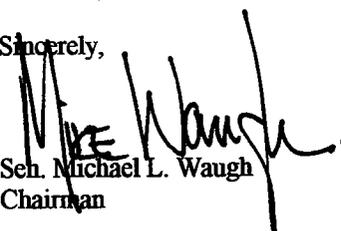
Unfortunately, that potential is not being realized under Pennsylvania's current regulatory structure. Enterprising farmers who are actively pursuing projects on their farm, including those who have received state funds for their projects, are finding that their efforts are for naught when they ultimately cannot connect to the grid cost-effectively. While the examples highlighted in the ANPR deal primarily with equipment and operating requirements, which are important, the CBC encourages the Public Utility Commission to also consider net metering procedures that can significantly improve the feasibility of these projects.

In order for the Bay region to benefit from these new technologies, utility regulations must be amended to meaningfully accommodate them. The CBC commends the Public Utility Commission for beginning to address this important topic and looks forward to continued progress. With 2010 as the deadline to remove the Bay from EPA's impaired water list, it is imperative that adoption of these technologies be facilitated as soon as possible.

If you have any questions, please contact the CBC's Pennsylvania Director, Marel Raub, at 772-3651.

Thank you for your consideration.

Sincerely,


Sen. Michael L. Waugh
Chairman