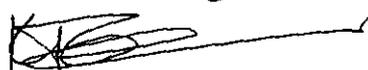


Secretary Rosemary Chiavetta,
Pennsylvania Public Utilities Commission
PO Box 3265
Harrisburg PA 17105

Dear Ms. Chiavetta,

Please find enclosed one original and three (3)
copies of the Solar Alliance's comments on the
Tentative Order on Net Metering, Docket No.
M-2011-2249441.

Sincerely,



Katie Bolcar
Director, Mid-Atlantic
The Solar Alliance
katie@solaralliance.org

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THE SOLAR
ALLIANCE MEMBER
COMPANIES

Amonix
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BP Solar
Community Energy
Element Power
EnXco
First Solar
Kyocera Solar
Mainstream Energy
Corporation
Mitsubishi Electric
Oerlikon Solar
Petra Solar
Q-Cells
Sanyo Energy
Corporation
Schott Solar
Sharp Solar
Smart Energy Capital
SolarCity
Solaria
Solar Power Partners
SolarWorld
SPG Solar
SunEdison
Sungevity
SunPower
SunRun
Suntech America
Tioga Energy
Trinity Solar
Uni-Solar
Verengo
Yingli Solar

Working with the states
to develop cost-
effective PV policies
and programs.

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SECRETARY'S BUREAU

Re: Tentative Order - Net Metering - Use of Third Party Operators: Docket No. M-2011-2249441

Date: September 12, 2011

Dear Commissioners,

The Solar Alliance is a group of approximately 33 photovoltaic (PV) solar companies in the United States, representing the entire value stream from solar manufacturing, investment and financing, to development and installation. We work with state policy makers and regulators to establish cost effective and successful solar policies and programs that help states capture associated economic development opportunities. We strive to increase the number and capacity of PV installations of all types, ensuring the market is vibrant, competitive and diverse.

We are writing to today to voice our support of the Commission's Tentative Order to clarify that ratepayers who partner with a third party solar provider to install a renewable generation system at their home or business are able to benefit from Pennsylvania's net metering law. The interpretation put forth in this Tentative Order ensures that Pennsylvania ratepayers have access to this growing option for accessing solar power.

The Solar Alliance also understands and supports the language for limiting net metering eligibility to no greater than 110 percent of the relevant electricity usage. However, in circumstances where evidence of prior usage is not available, the Solar Alliance recommends that the Commission allow for alternative means of determining the customer-generator's electrical use. For example, in the circumstances of new construction or the transfer of property, an alternative means of determining the appropriate system size may be necessary. One possible alternative for determining electrical usage would be for the Commission to allow such cases to base net metering eligibility on a formula that takes in to account variables such as square footage, usage patterns, and number of occupants.

The Solar Alliance thanks the Commission for this opportunity to comment. By clarifying net metering eligibility relative to the use of third party providers, the Commission takes an important step towards increasing Pennsylvania's use of alternative energy sources such as solar PV.

Respectfully submitted,



Katie Bolcar
Director, Mid-Atlantic
The Solar Alliance
katie@solaralliance.org

Katie Bolcar
Po Box 392
Linthicum MD
21090



Pennsylvania Public Utilities Commission
Attn: Sec. Rosemary Chiavetta
Po. Box 3265
Harrisburg PA 17105