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J. DAVID SMITH
Solicitor

Telephone (570) 320-2124
Fax (570) 320-2127

COUNTY of LYCOMING
48 WEST THIRD STREET
WILLIAMSPORT, PA 17701
July 21, 2014

www.lyco.org
county.commissioners@lyco.org

Pennsylvania Public Utility Commission
Attn: Ms. Rosemary Chiavetta, Secretary
P. O. Box 3265
Harrisburg, PA 17105-3265

Re: Public Comments on Docket No. L-2014-2404361

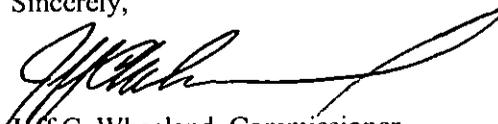
Dear Secretary Chiavetta:

Lycoming County is writing to express concern over the proposed revisions to the Alternative Energy Portfolio Standards Act (AEPS). **The proposed revisions are silent on how the changes in net metering applicability will influence existing facilities. Specifically, will a “grandfather exception” be applied to existing alternative energy facilities to enable the facilities to recover the capital invested based upon the original AEPS criteria?**

The specific section of the Order that causes Lycoming concern is on page 12. In the last paragraph, there is a reference that this approach should apply to all new customer-generators. Lycoming County is an active partner in a 3.0 MW net metering plant that has been in operation since 2012 with a site load of around 100 KW. Will these revisions be applied to existing facilities and create a “stranded capital” situation? Our plant used the existing AEPS Act as a basis for capital investment. Changing the basis of payment for electricity produces significant impacts to the economics to the point of where our plant may no longer be economically viable for our investment partner. If the 110% generation ceiling cannot be eliminated, it should only be applied to “new” customer generators.

The original intent of the AEPS was to keep our energy prices competitive through ingenuity and investment through a small incentive to influence investors. Consider this a plea to reconsider upsetting the investment strategies which provide benefits through the original Net Metering program and provide a “grandfather” clause to all existing facilities.

Sincerely,



Jeff C. Wheeland, Commissioner
Lycoming County Commissioners

CC: Senator Gene Yaw
Representative Garth Everett
Representative Rick Mirabito

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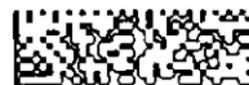


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