

**To:** Pennsylvania Public Utility Commission (PUC)  
**From:** SEEDS of Northeast Pennsylvania (Sustainable Energy Education & Development Support)  
**About:** PUC Proposed rules [52 PA. CODE CH. 75] [L-2014-2404361]  
Implementation of the Alternative Energy Portfolio Standards Act of 2004

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SEEDS (Sustainable Energy Education and Development Support) is a fast-growing non-profit community benefit organization in Northeast Pennsylvania dedicated to promoting efficiency, renewable energy, and sustainable living in our community. We sponsored training for local contractors in installation and maintenance of solar PV and thermal systems and small-scale wind. This has led to creation of two new Wayne County businesses and 6 well paying jobs in our area. As a result of these successes, in 2011, Wayne County was 3<sup>rd</sup> in the state per capita for solar installations as reported by the National Renewable Energy Lab. We are supportive of the homeowners who have made the financial commitment to clean energy, and we continue to promote solar technology to our residents and businesses alike. Solar energy is providing our area with greater energy independence and control over rising electricity costs. And, people who save on energy costs have more disposable income to boost our local economy.

Thus, we read with great concern, the July 5, 2014 proposed PUC rule changes. Specifically,

**#1.** We oppose utility companies charging a new fee to customers who have solar installations! As stated above, we are proud of the homeowners who have made the financial commitment to clean energy. Adding an extra fee for homeowners who did the right thing for our environment, for local jobs, and for efficient point-of-generation use of electricity is an insult to them. These fees will be interpreted as solar penalty, and will hurt the growth of the solar industry that our country desperately needs to develop. Many studies find that the benefits of net-metered clean energy far outweigh the costs. We vehemently oppose this proposed rule.

**#2**We oppose utility companies—not system owners— deciding the size of each solar installation. Our understanding is that the concern of the PUC is that owners will oversize systems to gain “excessive” benefits from selling excess generation back to the grid. Payments for excess generation are hardly an incentive for oversizing a solar array. The average size of residential systems receiving PA Sunshine

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Solar rebates was 7.7 kW. Now that the current sunshine program rebates have been used up, there will be even less incentive to over-size a system.

Pennsylvania's flawed SREC market, and weak clean energy legislation is hurting our economy. When surrounding states and the rest of the world are taking positive steps towards a clean energy future, the above two proposals will throw up a road block and keep our state going backward. Neighboring states of New York, New Jersey and Ohio are three of the top ten job states for the solar industry. There is tremendous solar potential here. We cannot deny Pennsylvania the benefits of solar industry growth and we must not deny Pennsylvanians an affordable means to generate their own energy. The PUC should support clean energy investment in any way it can.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katharine Dodge', written in a cursive style.

Katharine Dodge  
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