



Lancaster County Conservation District

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July 30, 2014

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North St., P.O. Box 3265
Harrisburg, PA 17105-3265

Proposed Net Metering Changes

L-2014-2404361

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JUL 31 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Commissioners:

The Lancaster County Conservation District wishes to express its concern regarding the proposed Net Metering Changes being considered by the Commission. Agriculture in Lancaster County is a vital component of our region's economy and innovative technologies are a key component for keeping our farming operations strong.

Proper waste disposal and rising energy costs are two perennial issues that threaten even the most successful farming operations. Anaerobic digesters and alternative energy systems provide environmentally friendly solutions for addressing both concerns. Unfortunately, the proposed changes in net metering will have a stifling effect on current and future alternative energy projects.

The specific concerns are:

1. In an era of resource conservation and promoting alternate energy production the proposed Net Metering Changes turn the clock back on the ag community's energy generating contribution. As the utility nears its 2021 requirement of 18% renewable energy generation within their portfolio the proposed rules indicate a "first come first serve" scenario which will become a limiting factor for farming operator. The nature of a farmer's business model doesn't afford them the luxury of speculating on future returns. Certain guarantees need to be in place before the significant capital investment can be made.
2. The net metering definition is unclear about which end users can be included in the maximum two (2) miles distance from the property that is generating the renewable energy.
3. The proposed Maximum generation cap at 110% of the annual electrical consumption would force current anaerobic digester operations to run far below their current kw capacity and serves to discourage future adoption and implementation of alternative energy generation by prolonging a reasonable return on the capital investment.

Therefore, we encourage the PUC to continue seeking policy solutions that encourage our local farms to be innovative leaders and successful operations. We would be happy to provide additional comments as needed.

Sincerely,

Frank R. Burkhart, Chairman of the Board

Generational Stewardship; A Conservation Legacy

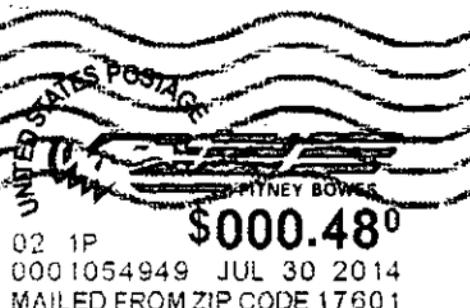


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