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August 1, 2014

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

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

Dear Secretary Chiavetta:

I am 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 concern is on page 12. In the last paragraph, there is a reference that this approach should apply to all new customer generators. The Dauphin County Industrial Authority owns a 2.0 MW net metering plant in Middle Paxton Township. 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 plan may no longer be economically viable. Several counties and municipalities have been looking at net metering projects. This would provide a much-needed revenue stream for these governments as well as helping our constituents by providing locally generated renewal energy. We should be looking to support as much United States-generated energy as possible.

The original intent of the AEPS was to keep our energy prices competitive through ingenuity and investment through a small incentive to influence investors. Kindly reconsider upsetting the investment strategies, which provide benefit through the original net metering program and provide a "grandfather" clause to all existing facilities. Thank you for your attention to this important matter.

Very truly yours,

Jeff Haste
Chairman

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Dauphin County Commissioners

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TO: *Pennsylvania Public Utility Comm.*
Attn: Ms. Rosemary Chivetta, Sec.
P.O. Box 3265
Harrisburg, PA 17105

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