



May 28, 2015

Pennsylvania Public Utility Commission
400 North St.
Keystone Building
Harrisburg, PA 17120

SolarCity is pleased to provide the following comments regarding the Advanced Notice of Final Rulemaking (Docket: L-2014-2404361) - Implementation of the Alternative Energy Portfolio Standards Act of 2004:

SolarCity strongly supports non-discriminatory treatment to customers who choose to have distributed generation. Therefore, SolarCity strongly supports the inclusion of the following section to the Net Metering section that is already provided with the word “may” changed to “shall”:

*“An EDC or DSP **shall** not charge a customer-generator a fee or other type of charge unless the fee or charge would apply to other customers that are not customer-generators, or is specifically authorized under this chapter or by order of the Commission.”*

SolarCity also wants to make clear that the Commission should protect and support the third-party ownership model for solar development. As such, we strongly encourage the Commission to insert clear and direct language supporting this model under the definition of “utility” in §75.1 to avoid any possible future confusion.

Lastly, SolarCity is concerned that the process defined in §75.17 (relating to Commission approval for alternative energy systems with a nameplate capacity of 500kW or greater) will further delay project development timelines. All customer-generators are required to size the alternative energy system to generate no more than 200% of the customer generator’s annual electric consumption, regardless of nameplate capacity. Any inconsistency in the application of net metering rules or the application of an EDC’s tariff should be dealt with by the respective EDC prior to granting approval to interconnect.



Thank you,

A handwritten signature in black ink, appearing to read "Chris Ercoli". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Christopher Ercoli
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SolarCity

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