March 26, 2013

Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Dear Commissioners,

Enclosed please find my comments regarding Docket No. L-2014-2404361. I believe that solar energy should be promoted and that some of your proposals will generate confusion or create serious disincentives for investment in solar energy in Pennsylvania. Therefore, I am writing to ask that you:

1) Eliminate the new load requirements in Sections 75.12 Definitions and 75.13(a)(1); and
2) Eliminate the 110% requirement in Section 75.12 D.

In addition, given my experience as a Customer-Generator who has had tremendous difficulty understanding my bills, I believe that it would be useful to include specific requirements regarding transparency for Customer-Generators who receive bills as a result of virtual net metering.

My experience comports with the change you propose in shifting the definition for "year" such that the period ends April 30 instead of May 31. I support that change.

Finally, I encourage you to support measures that would increase incentives for investment in solar energy in Pennsylvania, including:

1) Additional funding for the Sunshine Solar Program;
2) It has come to my attention that Pennsylvania's renewable energy portfolio requirement is very low compared to other states. Given the importance of renewable energy in preserving our environment, this should be increased. In addition, I have learned that Pennsylvania -- unlike most other states – does not provide incentives regarding the sale of solar credits to further encourage Pennsylvania solar production. If this is the case, this situation should also be corrected by curtailing or prohibiting the sale of out of state credits in Pennsylvania or providing greater incentives for PA solar credits.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Robin Alexander

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COMMENTS FROM ROBIN ALEXANDER
REGARDING PUC DOCKET NO. L-2014-2404361

1. Introduction

Although I had been considering the installation of solar panels for some time, it was not until the spring of 2012 that I finally did so. My primary motivation was environmental; I had already cut back my use of electricity substantially and it would be many years before I recovered the expense. Yet the imminent demise of the Sunshine Solar program meant that the moment for decision had arrived and I am pleased to report that I took the plunge.

My situation was complicated by the fact that my home is an old Victorian with a slate roof that is more than 120 years old. However, previous owners had built a separate garage with a flat roof that was easily accessible from the yard in between the house and the garage. I am sharing these details because the layout of my system required virtual and net metering (although I also looked into setting up a system that was off the grid, I quickly concluded that did not make sense for me).

As a novice, it was a bit daunting to try to gain an understanding of what was possible, required, and why costs varied so greatly between installers -- not to mention the entirely separate issues about whether the warranty on my new garage roof would still be good and whether I would need to increase coverage or change the terms of my home owners' policy. Fortunately, after a few false steps, research and luck led me to Adam Solar Resources (ASR) and I had the good fortune to be in the service area of Duquesne Light. The installation went beautifully and in short order I was inviting friends to admire my meter as it slowly ran backwards.

The comments that appear below are based on my own personal experience as a customer-generator who owns a small system. I have been moved to submit comments because several aspects of your proposed regulations would serve as a disincentive for potential consumers to become small customer-generators as I have. Therefore, I hope you will reconsider promulgating the regulations regarding load and the 110% rule. In addition, while my experience with Duquesne Light has generally been quite positive, most of my bills are totally unintelligible. Therefore, when revising your regulations I also strongly suggest that you provide some clear guidance to the utility companies to ensure transparency and clarity for consumers who use virtual and net metering.

2. Specific Comments and Recommendations

a. Eliminate the new load requirements in Sections 75.12 Definitions and 75.13(a)(1).

Many consumers who consider installing solar panels must first address the question of where to install them. In some cases the roofs of their homes may be perfectly appropriate. However, in many other cases, including my own, such installation was not viable. I had to consider either creating a structure for panels in my yard or using my garage roof. Fortunately I had a good option, as my home already included a garage with a flat roof. However, many others either would not have that option or, if living in a more rural area, would logically choose to use land near their home rather than a roof. To prohibit this by imposing a load requirement creates a real disincentive for small consumers of electricity to

invest in solar panels. The only option would be to build a new structure that would use electricity for some other purpose, something few would be likely to do.

The rationale provided for the new requirement states that it is implied by the requirement that the electricity generated be used to off-set the customer-generators' requirement for electricity. However, this fails to recognize that the use takes place via virtual net metering, such that the electricity produced by the customer-generator in one location is actually used to off-set his or her use in another. A second rationale that is set forth is that this change would prevent utilities such as merchant generators from qualifying for net metering. While the merits of that question do not appear to be discussed anywhere in the proposal, if that is the objective I would suggest that you propose and request comments on a much more restrictive limitation that does not have what may be the unintended consequence of discouraging customer-generators from investing in solar energy.

b. Eliminate the 110% requirement in Section 75.13

This requirement appears unnecessary, it is certainly confusing and it would no doubt serve as a disincentive for small customer-generators who might be interested in investing in solar power.

It is unnecessary because you already have a clear limitation on system size that directly and effectively sets an enforceable standard. It is confusing because it is entirely unclear why you would want to impose a requirement which would be unworkable for a small system, how annual consumption can be meaningfully projected, how or when this requirement would be applied, or how it could be enforced. That lack of clarity would provide yet another barrier and disincentive to consumers who might otherwise invest in small systems as customer-generators.

While it makes sense for a customer-generator to try to size his or her system to coincide with projected usage (and the limitation on reimbursement of excess production to the price to compare rate provides a further economic incentive to do so), my personal experience is that this is easier said than done because a variety of factors may impact both sides of the equation. On the usage side, a change in weather, family size, or additional or different appliances or practices may all impact usage. In my own case, in the months before I installed the solar panels I also replaced all of my light bulbs with more efficient types and became much more vigilant about shutting off lights. Not surprisingly, my usage dropped below what we had projected from my prior years' bills. This winter, I have been hosting a lovely young woman who happens to have come to Pittsbugh during the worst winter I can remember. Her room is the only one in the house with electric heat and my usage increased substantially. On the other side of the equation, production has been impacted this year by the growth of trees that the city has failed to trim and by a winter with far more snow, decreasing the production of electricity on numerous days this winter.

The end result was that in the first year I produced enough energy to cover my needs and receive approximately $60.00 for the excess generated by my panels. However, over the past three months I have been paying significantly higher energy bills. Should I have sized

my system differently to begin with? Perhaps so. But I think I should be the one to decide both about the initial size that is most appropriate based on what I can afford and what I reasonably project to be my future needs.

Similarly, it is unclear to me whether the proposed regulations seek to limit only the initial projection or, once a system is certified, if this new requirement would then be used to restrict any compensation for excess production to 110% of what was used the prior year. As illustrated above, the variables that can drastically impact production and use for a small system over any given year would make this totally unreasonable.

Moreover, it seems to me that it makes no sense to introduce a regulation where reasonable people could easily differ over what could be projected. Should the projection change if I marry? If my children leave for college? If I retire and spend more time at home? If I buy an electric car? If I switch from a gas to an electric water heater? If the city finally trims its trees?

While there is no problem recommending that a system be sized to equal 110% of projected usage, to impose this as a requirement would be extremely unfair and a serious mistake.

c. You should include specific requirements regarding transparency for consumer billing.

As noted above, Duquesne Light has been extremely easy to deal with in setting up my system of virtual net metering. However, dealing with them regarding my bills has been frustrating. I wish to stress that everyone I have dealt with has been friendly and has attempted to be helpful, so I do not interpret this in any way as intentional.

There should be clear provisions requiring that DSPs provide transparent and clearly understandable bills to customer-generators who utilize net and virtual metering. At the very least there should be clear information regarding the actual readings, rates, charges or credits, and the specific amount of any customer or special charges. They should also be required to have trained staff who are prepared to respond within a reasonable amount of time and a system for complaints that is described on the bills so that consumers have a place to turn for relief when their questions are not answered or concerns are not addressed. Unfortunately, at present this is not the case.

Following unsuccessful efforts to obtain a response from the appropriate department, it was suggested to me that I could submit my concerns on line. I have done so and have attached a copy to provide an idea of some of the issues I have encountered. I received a call this morning with a commitment to respond to my questions and remain optimistic that I will eventually get the information I have requested from Duquesne Light and that any appropriate adjustments will be made. However, clear bills would have saved much time and effort on all sides and should be required.

d. My experience comports with the change you propose in shifting the definition for "year" such that the period ends April 30 instead of May 31. I support that change.

Submitted on Duquesne Light web site on March 19, 2014

I have virtual net metering so I actually have two accounts. The other is 7000-745-755-001. I have the following questions:

1) The 900 kwh excess that is reported on the bill prepared on December 8, 2013 disappeared from the following bill and was not applied to reduce the amount I owed. Although I have paid the amount indicated, I have been unsuccessful in obtaining either an explanation for what happened or a resolution. Although I have been told that emails were sent to the proper department, I have not received any response.

2) What should I be paying as a monthly customer charge for these meters? (I had assumed it should be a fixed monthly rate and should be the same for both meters, but this is clearly not the case). Have I been charged correctly?

3) Some years ago I signed up for the Dominion water line protection program. The charge for this service was $3.25 per month. Although I was under the impression that I continued to be billed for this service since I was being charged more for the house than the garage. However, a close inspection of my bills has caused me to wonder (fortunately, I have not yet had a problem). Can you clarify whether I am currently covered by this program, whether I have been charged, what I have been charged, and where this should be appearing on my bills?

4) At the top right side of the bill is a category entitled "prior billing information." Before installing the solar panels this always contained two sub-categories: "Amount of last bill" and "Payment(s) received as of _____," followed by a line for "Total amount from your last bill." Since I pay my bills on time, in the past these had always contained the amount of the prior bill, my payment (the same amount) and the total owed from the prior bill, equaling zero.

Now, that section of the bill usually (but not always) drops out the line about prior payment and the amounts under "amount of last bill" and "total amount owed" have no relationship to the prior bill. For example, in my January 2014 the $55.23 under prior bill information is unrelated to any prior bill and appears to be related to the calculations on p.3. However, where the numbers come from is a mystery to me: what is the prior billing information and what is the adjustment? I would appreciate it if someone would explain to me what these calculations mean.

5) It has only been since January 2014 that information regarding the cost of supply, transmission and distribution has appeared on my house bills, although this information had appeared as a normal part of my bills prior to installing solar panels. Similarly, there seems to be a new system for netting out consumption and production, resulting in different "actual" readings on the front and back of the bills. Clearly both cannot be "actual." Am I correct that the numbers on the front are not actual readings but reflect consumption less production? Am I correct in thinking that this is a new system? Will you continue to provide information regarding costs (definitely an improvement!)?

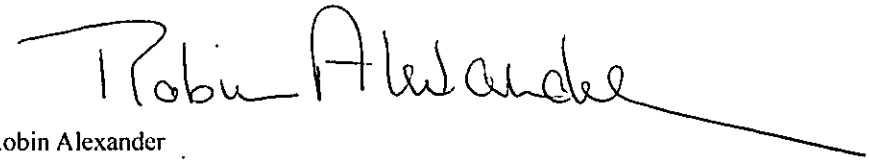
6) The bills report actual readings for both meters on what are generally different but are occasionally the same dates. Why does this occur?

Finally, I encourage you to support measures that would increase incentives for investment in solar energy in Pennsylvania, including:

1) Additional funding for the Sunshine Solar Program; and

2) It has come to my attention that Pennsylvania's renewable energy portfolio requirement is very low compared to other states. Given the importance of renewable energy in preserving our environment, this should be increased. In addition, I have learned that Pennsylvania -- unlike most other states – does not provide incentives regarding the sale of solar credits to further encourage Pennsylvania solar production. If this is the case, this situation should also be corrected by curtailing or prohibiting the sale of out of state credits in Pennsylvania or providing greater incentives for PA solar credits.

Respectfully Submitted,



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