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PO Box 600
2323 Marston Road
New Windsor, Maryland 21776

Enviro-Organic Technologies, Inc
Professional Beneficial Use
Residuals Management Services

Office @ 410-635-3292
Office @ 410-635-3179
Fax @ 410-635-3150
Web @ enviro-organic-tech.com

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July 31, 2014

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
PO Box 3265
Harrisburg, PA 17105-3265

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Docket L.-2014-2404361

Proposed Net Metering Changes

Dear Commissioners:

I have been in the waste hauling business for over 18 years. My wife and I started our business because we saw an opportunity to manage food waste and other residuals as a recyclable product. These residuals (such as food processing residuals) are used as a replacement to commercial fertilizer. All of the products we land apply have some sort of nutrient or soil conditioning value. These values range from complete replacement of commercial fertilizer by providing the nutrients farmers need to grow their crops to increasing the structure of the soil by adding organic matter that increases moisture holding capacity to adjusting the PH to levels for optimum crop growth.

We either haul our products direct to the fields or take it to storage, depending upon the time of the year (as winter conditions will not allow land application of fertilizers). For years we have wanted to tap the additional unused potential of these wastes, since biogas can be captured and electricity generated may be created prior to utilizing the fertilizer value.

We recently investigated an investment in anaerobic digestion. The plan would be to purchase land to install the digester and haul all our wastes into a central location for anaerobic digestion to make biogas and electricity and the haul out the digester effluent as fertilizer to neighboring farms. All signs pointed to this being a sound financial investment for our company until we investigated net-metering rules in our home state of Maryland. These rules limit net-metering to "200% of baseline customer usage". Since we would not have any "baseline electrical usage" we would not be allowed to participate in net-metering. We put our plans aside for several months but recently started looking to purchase land in Pennsylvania because the net-metering rules were "more friendly" for

Renewable Energy projects. We have made an offer to purchase land in Franklin County, and will most likely still pursue this, but the option to install a digester system is in question.

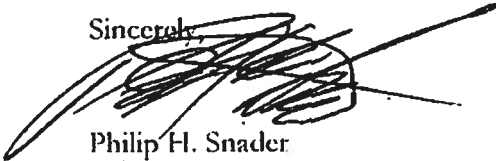
If the proposed regulations go into effect, we our project would not be allowed to participate in net-metering since the site we have in mind has an annual electric consumption of ZERO kWhs. If we were to build a digester in PA more than \$2,000,000 would be directly spent in 6-8 months in the State on equipment purchases and hiring of subcontractors.

We don't understand why the PUC is proposing net-metering laws that will restrict the installation of Renewable Energy project from wastes. It doesn't make sense. Renewable Energy is good for the economy and good for the environment.

Will the PUC be willing to reconsider the site load requirements and 110% rule for net-metering?

Please reconsider the proposed net-metering regulations.

Sincerely,



Philip H. Snader

V.P. Project Development

Enviro-Organic Technologies

phil.enviro_organic@verizon.net

Office 410-635-3292

Cell 443-974-0468