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Sent: Thursday, November 06, 2014 9:29 PM
To: Mirzakhali, Ali (DNREC); Gray, Valerie A. (DNREC)
Subject: Clean Power Rule

Ali, Valarie

At this time, I'm sending this to you as David Bacher, citizen from New Castle County, not as NRG. My comment and request is to look at the NERC report and incorporate these reliability concerns in your comments. The NERC comments attached and NERC as an independent review looks at the entire picture, not from advocacy, rather reliability and has very valid concerns and comments.

High level, they have serious reliability and implementation timeline concerns. This relates to our discussion last night on the timeline resulting from the 2020 "cliff" and the exposure from immediate coal unit shut downs and a potential for an over expansion of natural gas units. While NERC has concern on capacity reserves and reliability, the other material effect can be if too many NGCC units enter the market, it can have the undesired effect of closing entry of the more desired renewable or non-zero emitting sources. Thus the need for a gradual and planned slide path transition within the 2020 to 2030 timeline.

Interesting, while I didn't read this report until today, it reflects our discussion last night on heat input improvement opportunity (confirming it does not exist), over reliance and over capacity of natural gas and reliability and public safety risk from polar vortex like events where gas is interruptible in the winter. They have concern that EPA completely ignores how gas markets work and the impact of first rights customers compared to interruptible end use generators and the exposure to the north east because of pipeline capacity constraints. In fact, last winter (with a robust coal fleet in operation which would not be available in 2020) it is my understanding the Mid-Atlantic region was "one coal unit away" from winter time brownouts/blackouts, thus why NERC suggests reliability assurance mechanism's be in place.

Delaware is a small state and the net emissions impact on our efforts toward the climate change challenge is miniscule. However, as a state agency, your input on good regulation which is where I think your comments and contributions are more than valuable. Simply put, the goal is "clean air" not "clean policy".

Regards,

David Bacher