

January 20, 2016

Ms. Valerie Gray
Division of Air Quality (ATTN. CPP)
Department of Natural Resources and Environmental Control
State Street Commons
100 W. Water Street, Suite 6A
Dover, DE 19904

Re: Delaware's Compliance with EPA's Clean Power Plan

Comments from New Castle County Congregations of Delaware Interfaith Power and Light regarding the recommendation of utilizing the CEIP program within Delaware's Proposal for Compliance with the EPA Clean Power Plan.

**Mission Statement of New Castle County Congregations (NC3)
of Delaware Interfaith Power and Light**

Future generations will inherit a world that will be shaped by how well we conserve and use resources today. The decisions that we make and the policies that we adopt will determine the health of our earth for centuries to come. Climate change is not only a scientific problem, but also a political, economic, social and ethical one. Only when enough of us act to mitigate the potentially devastating effects of climate change will political change follow. As members of NC3 we acknowledge the consequences of climate change and pledge to take climate-conscious actions now, before irreversible damage occurs.

Our work includes advocacy for environmental policies that include the needs of low-income communities, with consideration of their greater vulnerability to the consequences of climate change. Beyond the politics and economics of climate change, we consider our work a moral imperative that includes economic and environmental justice.

We believe that the Clean Energy Incentive Program (CEIP) will strengthen the Clean Power Plan in Delaware by providing an incentive for early action on renewable energy sources and on energy efficiency in low income communities. This will bring investments in clean energy and energy efficiency to communities with the greatest vulnerability to climate change. In addition, enacting the CEIP in Delaware, will bring the following benefits to low-income communities:

- Reduce some barriers to energy efficiency projects in low-income communities,
- Improve the public buildings and housing in low-income communities,
- Lower household energy bills and preserve affordable housing, through energy efficiency investments, for people who will most benefit,
- Provide good jobs and career paths for the people who most need them,
- Build and support a skilled workforce in clean energy and energy efficiency, and
- Reduce pollution in frontline communities

Beyond the benefits to low-income communities, Delaware's implementation of the CEIP can put in place the foundation to prepare a workforce trained to carry out clean energy installations and retrofits. In implementing the CEIP, Delaware will have the opportunity to award early compliance credits (CO2 allowances or Emission Reduction Credits), with EPA granting double matching credits for energy efficiency projects in low income communities. Renewable (wind and solar) projects that start construction will be eligible for credits for the energy produced in the years 2020 and 2021, for which EPA will grant a matching credit.

Low-income communities disproportionately pay a higher percentage of energy costs. In fiscal year 2014, low-income households spent an estimated 16.3% of their household income on energy, while wealthier households spent 3.5%. In addressing energy efficiency for low-income communities, Delaware's inclusion of CEIP in the implementation of the CPP would provide a double benefit: increasing energy efficiency, with the benefit of Emission Reduction Credits, and lowering the burden of energy costs on low-income families. This approach will address the critical need to protect poor families from inequitable energy costs.

We strongly support the inclusion of CEIP in Delaware's implementation plan for EPA's Clean Power Plan for reasons of emissions reductions, energy efficiency, and economic and environmental justice in low-income communities.

Respectfully,

Chad Tolman and Mike Rominger, Co-Chairs
New Castle County Congregations of Delaware Interfaith Power and Light

Elizabeth Siftar, Chair
Green Sanctuary Team of the First Unitarian Church of Wilmington

