

In The Matter Of:
*Delaware Department of Natural Resources
and Environmental Control*

*In Re: Implementation of Renewable Energy
November 23, 2015*

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

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RE: Public Hearing Re:)
Implementation of Renewable)
Energy Portfolio Standards)
Cost Cap Provisions)

.. . . .

PSC Hearing Room
Cannon Building
861 Silver Lake Boulevard
Dover, Delaware 19904

Monday, November 23, 2015
6:00 p.m.

.. . . .

BEFORE: Lisa Vest, Hearing Officer

-- Transcript of Proceedings --

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1 MS. VEST: We are going to go ahead
2 and begin the proceedings tonight. I want to thank
3 everybody for coming out on this unusually cold day.
4 The time is 6:06 p.m. on Monday, November 23, 2015,
5 and we are going to go ahead and begin the
6 proceedings tonight.

7 We are here to take public comment
8 for the record regarding the Department's Proposed
9 Regulations Regarding the Implementation of the
10 Renewable Energy Portfolio Standards Cost Cap
11 Provisions.

12 This is a little unique in that this
13 is the third public hearing that we have had
14 regarding this proposed promulgation pursuant to
15 Delaware law.

16 No decision is going to be made
17 tonight regarding this proposed promulgation. The
18 record is going to remain open for a full 15 days
19 beyond tonight's hearing.

20 So if you just decided to come and
21 not offer comment but see what was being said at the
22 hearing on the record, that's perfectly all right.
23 If you wish to offer comment, the record will remain
24 open through close of business on Tuesday,



1 December 8, 2015.

2 And it should be noted, as is the
3 course with all of our promulgations, all comment
4 bears the same weight, whether it was previously
5 offered, whether it's offered tonight verbally, or
6 whether it comes in as written comment on or before
7 the close of business on December 8.

8 I also want to note for the record
9 that, like I said, this is the third of three
10 hearings that we have had on this matter. The first
11 hearing happened in January of 2014. The Department
12 went back and did some revisions, and we had a
13 second hearing in January of 2015. And now we are
14 here again with yet more revisions for the third
15 hearing.

16 Any comment that was previously
17 offered is still in the record. Any exhibits that
18 were offered by the Department are still part of
19 this record. It's been a continuing record ever
20 since the first hearing on January 8, 2015 -- or
21 2014, rather. I'm sorry.

22 So, that being said, I'm going to
23 turn it over to the Department. I believe they have
24 a brief presentation, and there are some additional



1 exhibits that will go into this ongoing record
2 following the conclusion of that presentation. Tom?

3 MR. NOYES: Thank you. Today's
4 hearing is to discuss a Revised Proposed Regulation
5 for the Implementation of the Renewable Energy
6 Portfolio Standards Cost Cap Provisions.

7 My name is Thomas Noyes. I am
8 Principal Planner for Utility Policy for the
9 Division of Energy and Climate of the Department of
10 Natural Resources and Environmental Control, or
11 DNREC. I am the responsible staff member for this
12 proposed regulation.

13 The DNREC Division of Energy and
14 Climate proposes rules to govern the Implementation
15 of Renewable Energy Portfolio Standards Cost Cap
16 Provisions, 26 Delaware Code, Section 354 (i) and
17 (j) of the Renewable Energy Portfolio Standards Act,
18 or REPSA. These provisions were adopted as part of
19 Senate Substitute 1 to Senate Bill 119, which was
20 passed by the General Assembly in 2010.

21 The proposed regulation directs how
22 the Division of Energy and Climate calculates the
23 cost of compliance with the RPS; how the Director of
24 the Division of Energy and Climate determines



1 whether and when to impose a freeze in
2 implementation of the RPS under REPSA; and how the
3 Director of the Division of Energy and Climate
4 determines whether and when to lift a freeze.

5 A first draft of the proposed
6 regulation was published on December 1, 2013. A
7 hearing on this matter was held January 8, 2014.

8 The Division published a revised
9 draft regulation on December 1, 2014. A public
10 hearing was held on January 7, 2015.

11 An erroneous draft regulation was
12 published in the October 1, 2015 Register of
13 Regulations. A correct draft regulation was
14 published in the November 1, 2015 Register.

15 The public comment period will be
16 open until December 8, 2015 at 4:30 p.m. All
17 comments received in response to the October 1, 2015
18 notice will be considered part of the record.

19 I would like to highlight three
20 changes to the proposed regulation:

21 1. The total annual interpretation
22 of the cost of compliance is replacing the
23 year-over-year interpretation.

24 2. QFCP -- that is Qualified Fuel



1 Cell Project -- for Bloom Energy costs (not defined
2 as renewable energy in the statute) are not being
3 included in the cost of compliance.

4 3. Specific references to
5 consultation with the Public Service Commission are
6 included.

7 The revised proposed regulation was
8 published in the Register of Regulation on
9 November 1, 2015. The proposed regulation has been
10 available for public review and comment at the
11 Department's Division of Energy and Climate office
12 in Dover and online at -- I have the URL for the
13 Register of Regulations, November 1.

14 (Reporter note:
15 [Http://regulations.delaware.gov/register/november2015/proposed/19%20DE%20Reg%20397%2011-01-15.htm](http://regulations.delaware.gov/register/november2015/proposed/19%20DE%20Reg%20397%2011-01-15.htm).
16

17 The legal notice regarding the
18 availability and publication of the proposed
19 regulation and the schedule of tonight's hearing was
20 published in the News Journal on October 23, 2015
21 and the Delaware State News on October 25, 2015.

22 The Division of Energy and Climate
23 welcomes all comments from the public. Since this
24 hearing is considered a continuation of the previous



1 hearings, all comments submitted up until the
2 previous hearing are already considered part of the
3 record.

4 We are submitting the following
5 documents for the record here this evening:

6 The transcript of the hearing held
7 January 7, 2015.

8 All comments received since the last
9 hearing.

10 Register Notice 102 implementation of
11 Renewable Energy Portfolio Standards Cost Cap
12 Provisions, including notice of today's hearing
13 published in the Delaware Register of Regulations
14 dated November 1, 2015.

15 Affidavit of publication of the
16 proposed regulation and notice of today's hearing in
17 the News Journal on October 23, 2015, and Delaware
18 State News on October 25, 2015.

19 The opening statement that I am
20 delivering to you right now.

21 And the Power Point you have been
22 looking at this evening.

23 That concludes my remarks.

24 MS. VEST: Thank you, Mr. Noyes.



1 A little housekeeping: Let the
2 record reflect that the additional exhibits
3 identified by the Department just now are added to
4 the ongoing open hearing record regarding this
5 matter.

6 Does the Department have any
7 additional comments it wishes to make at this time?

8 MR. NOYES: No, we do not.

9 MS. VEST: Very good. At this point
10 I will open the floor if there is anyone who wishes
11 to offer comment for the record.

12 Again, anything that was previously
13 entered into the record is still there. This is not
14 a new hearing, but, rather, a continuation of the
15 promulgation process that started back at the first
16 hearing in January of 2014.

17 Also, if you have prepared written
18 comments, I would be willing to take them, as well.

19 Is there anyone that wishes to offer
20 formal comment for the record at this time?

21 MS. PRYDE: I have already said that
22 I think that the --

23 MS. VEST: I'm sorry, ma'am. Could
24 you --



1 MS. PRYDE: Coralie Pryde.

2 MS. VEST: Yes.

3 MS. PRYDE: C-O-R-A-L-I-E, P-R-Y-D-E.

4 I have already submitted personal comments last
5 spring saying I think that the regulations are now
6 very clearly written and should avoid any
7 misunderstanding of how the cost cap should be
8 calculated.

9 The change from year-over-year to
10 compliance year does not bother me. I'm very happy
11 to see that Bloom Energy is no longer being counted
12 as a part of renewable energy. And I'm also very
13 pleased to see that the legitimate chronology in
14 savings will be counted in a positive way, because I
15 think that it's very important that we go to
16 renewable energy because of the cost of carbon to
17 our climate and people's health. And that's all.

18 MS. VEST: Thank you, Ms. Pryde.
19 Anyone else? Okay. Let the record reflect that
20 there is no one at this time wishing to offer
21 additional comment.

22 As I noted previously, no decision is
23 made tonight. This is a continuation of what the
24 Department has been proceeding forward with since



1 the first hearing in January of 2014.

2 The record will remain open if anyone
3 wishes to submit additional comment through Tuesday,
4 December 8, 2015 at close of business.

5 There being no additional comment for
6 the record, I am going to conclude the proceeding at
7 this time. I want to thank everybody for coming
8 out. This hearing is adjourned.

9 (Adjourned at 6:17 p.m.)

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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 25th day of November 2015.



Lorena J. Hartnett
Registered Professional Reporter

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