

In The Matter Of:

*Department of Natural Resources & Environmental Control
Proposed Regulatory Amendments*

*Public Hearing
August 29, 2018*

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

RE: Public Hearing Regarding)
Proposed Regulatory Amendments to)
7 DE Admin. Code 1147, the CO2)
Budget Trading Program.)

..

DNREC Richardson & Robbins Building
89 Kings Highway
Dover, Delaware 19901

Wednesday, August 29, 2018
6:02 p.m.

..

BEFORE: Lisa Vest, Hearing Officer

ALSO PRESENT: Valerie Gray, DNREC

-- Transcript of Proceedings --

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1 MS. VEST: If everyone could take
2 their seats, we will go ahead had and get started.
3 Hopefully, everyone can hear me. I will try to
4 remember to keep my voice up, because I don't have a
5 microphone.

6 I want to thank everybody for coming
7 out tonight. We are here this evening to receive
8 comment -- thank you.

9 (Ms. Gray handed microphone)

10 MS. VEST: We are here this evening
11 to receive comment, if any wishes to be offered for
12 the record, concerning the Department's proposed
13 regulation amendments to 7 Delaware Admin Code 1147,
14 otherwise known as the CO2 Budget Trading Program,
15 otherwise known as the Regional Greenhouse Gas
16 Initiative, or RGGI for short.

17 For those of you who may not know me,
18 my name is Lisa Vest, and the Secretary of DNREC has
19 designated me to serve as hearing officer for
20 tonight's proceedings.

21 I just want to give a little protocol
22 as to how tonight is going to go and touch base on a
23 couple of things before I turn it over to staff for
24 their comments.



1 The record normally, under Delaware
2 law for regulatory matters, stays open for 15 days
3 from the date of the hearing. I'm going to extend
4 that, so no one even has to offer that as a request
5 or a comment.

6 There are some documents that we
7 would like to have the public have the benefit of
8 reviewing. They were supposed to be on the web.
9 They are not.

10 So, given that, some of you may have
11 seen a notice either in the registrar or in
12 discussions that the record would remain open
13 through February -- or through February -- through
14 September 13.

15 I am going to extend that. The
16 record is going remain open through the close of
17 business on Friday, September 28. So I'm going to
18 leave it open for the entire month of September.

19 And we should be able to get
20 documents up on the web, or the Department should,
21 rather, no later than the end of this week. And
22 then, hopefully, the additional time will give
23 everybody a little bit of grace and have the ability
24 for people to offer additional comments if they wish



1 to do so.

2 I should also note that all comment
3 bears equal weight, whether it's offered here at the
4 hearing, whether it comes in by e-mail or U.S. mail,
5 or whether it came in two weeks ago. It all bears
6 the same weight. It will all get incorporated into
7 the record, and all will be reviewed and considered
8 by the Secretary prior to his decision in this
9 matter.

10 That being said, I'm going to turn it
11 over to Valerie Gray, who I believe has some brief
12 statements to enter in, as well as exhibits. And
13 once that's done, we will turn the floor open to
14 comments. So Valerie?

15 MS. GRAY: Thank you, Lisa. Good
16 evening. And my name is Valerie Gray, and I am a
17 Planning Supervisor for the Division of Air Quality.

18 Tonight, the Department is presenting
19 its proposed amendments to 7 Delaware Code 1147, the
20 CO2 Budget Trading Program.

21 These amendments will align
22 Delaware's program to be consistent with the
23 Regional Greenhouse Gas Initiative's updated Model
24 Rule as amended and published on the RGGI.org



1 website on December 2017.

2 The following is the Department's
3 statement:

4 As many of you know, the Regional
5 Greenhouse Gas Initiative is a cooperative effort of
6 nine Northeast and Mid-Atlantic states to regulate
7 and reduce carbon dioxide emissions from the power
8 sector.

9 In accordance with each state's
10 independent legal authority, Connecticut, Delaware,
11 Maine, Massachusetts, Maryland, New Hampshire, New
12 York, Rhode Island, and Vermont, known as
13 participating states, each commit to propose
14 statutory and/or regulatory approval revisions to
15 their CO2 Budget Trading Programs substantially
16 consistent with the updated Model Rule which, as I
17 mentioned, was released in December of last year.

18 The program was established in 2005
19 by the participating states through a Memorandum of
20 Understanding which outlined the RGGI program design
21 elements and directed state staff to develop a Model
22 Rule for states to use in their state-specific
23 rule-making processes.

24 The design elements in the MOU were



1 then incorporated into the Model Rule. The 2005
2 program design elements included the level of the
3 regional emissions cap, the apportionment of each
4 state's portion of that regional cap, the schedule
5 for reductions in the cap through 2018, a three-year
6 compliance period for compliance entities,
7 provisions for offsets, which are the reductions in
8 greenhouse gases from sources outside the
9 electric-generating sector, and established the
10 first program review to begin in 2012.

11 Delaware's 7 Admin Code 1147
12 establishes a compliance obligation on fossil
13 fuel-fired electricity-generating units with
14 capacities greater than 25 megawatts to report their
15 emissions, their CO2 emissions, and surrender the
16 corresponding CO2 allowances for those emissions.

17 The Department's authority that was
18 established for this regulation is found in the
19 Delaware Code, Title 7, Chapter 60, and is described
20 in Section 6043 through 6046, whereby the General
21 Assembly explicitly authorizes and sanctions prior
22 and ongoing participation of the Secretary of the
23 Department of Natural Resources and Environmental
24 Control, and the Chair of the Public Service



1 Commission, and their duly authorized
2 representatives, as their official duties to be
3 implementing and participate in the Regional
4 Greenhouse Gas Initiative.

5 And further on in Section C of that
6 same section: The Secretary of the Department of
7 Natural Resources and Environmental Control is
8 herein authorized to promulgate regulations to
9 implement the RGGI cap and trade program consistent
10 with the MOU, as amended.

11 The 144th Delaware General Assembly
12 adopted the Regional Greenhouse Gas Initiative
13 enabling act found in 7 Delaware Code, Section 6043
14 through 6046, through the enactment of Senate Bill
15 Number 263, 76 Delaware Laws Chapter 262 in 2008, by
16 Senate vote of 15 to 1, with one member absent, on
17 June 11, 2008, and a House vote of 39 to 1, with one
18 member absent, on June 24, 2008.

19 7 Delaware Code, Section 6043(a)(9)
20 notes that the MOU sets an initial emissions cap for
21 Delaware of 7,559,787 and further requires a minimum
22 of 25 percent of the Delaware's allocation of the
23 CO2 allowances under the cap-and-trade program to be
24 used for public benefit purposes. It then states,



1 "The cap in Delaware's allocation may be adjusted in
2 the future."

3 Pursuant to 7 Delaware Code, Section
4 6043 and 6044, the Secretary of DNREC is authorized
5 to participate in the Regional Greenhouse Gas
6 Initiative and to promulgate regulations to
7 implement the RGGI cap and trade program consistent
8 with the original MOU.

9 As called for in the RGGI 2012
10 program review, as mentioned in the previous MOU,
11 Summary of Recommendations to accompany the Model
12 Rule amendments, the Participating States conducted
13 a second program review, now known as the 2016
14 program review.

15 These proposed amendments to the
16 program have been incorporated in the updated Model
17 Rule previously mentioned, these amendments which
18 guide our states, Participating States, as it
19 follows each of its own statutory regulatory
20 procedures to propose updates to their individual
21 CO2 Budget Trading Regulations.

22 The RGGI program review was a
23 rigorous and comprehensive evaluation supported by
24 an extensive regional stakeholder process that



1 engaged the regulatory community, environmental
2 nonprofits, consumer and industry advocates, and
3 other interested stakeholders.

4 The Participating States have been
5 working with program review stakeholders since 2015,
6 convening nine stakeholder meetings and webinars.
7 Delaware hosted one of those stakeholder meetings in
8 Wilmington on February 22, 2016.

9 The program review has sought to
10 ensure RGGI's continued success, effectively
11 reducing CO2 emissions while providing benefits to
12 consumers in the region.

13 The proposed amendments to 7 Delaware
14 Admin Code 1147 would implement the program changes
15 presented in the RGGI Updated Model Rule and the
16 2016 Program Review Principles. The changes
17 contained in the RGGI Updated Model Rule were agreed
18 by the RGGI Participating States after a
19 comprehensive two-year program review.

20 The purpose of the Updated Model Rule
21 is to serve as a template for similar modifications
22 to each of the RGGI Participating States' existing
23 CO2 trading programs.

24 These modifications strengthen the



1 RGGI program, make it more effective, and realign
2 the regional cap with current emission levels, which
3 is significantly lower than the current regional
4 cap.

5 These changes include a reduction in
6 the regional CO2 budget, also known as the RGGI cap,
7 for years 2021 through 2030 and each succeeding year
8 thereafter; adjustments to the RGGI cap in years
9 2014 through year 2020 account for the private bank
10 of allowances; adjustments to the size of the Cost
11 Containment Reserve to an annual quantity of
12 10 percent of the state's budget beginning in 2021;
13 and modifications to the CCR trigger price to \$13.00
14 beginning in 2021 and rising by 7 percent each year
15 thereafter; establishment of an Emission Containment
16 Reserve to respond to supply and demand in the
17 market if emission reduction costs are lower than
18 projected beginning in 2021; updates to the RGGI
19 offsets program, and remove two protocols, or offset
20 categories, for SF6 and End-Use Energy Efficiency;
21 and, finally, numerous administrative changes and
22 updates, including updates to all documents that are
23 incorporated by reference in the updated model log.

24 I will explain each of these major



1 amendments. The Participating States agreed to
2 establish a regional cap through 2030, modify the
3 size of the trigger prices for the CCR, establish
4 the Emissions Containment Reserve, and eliminate two
5 of the existing offset categories.

6 The Revised Regional Cap: The
7 Participating States will specify a regional cap
8 through 2030 which continues the downward trajectory
9 of the existing cap.

10 The lower regional CO2 emissions cap
11 will align the cap more closely with the current
12 emissions trends.

13 A regional cap of 75,147,784 tons of
14 CO2 in 2021, which will decline by a fixed amount of
15 2.275 million tons of CO2 per year thereafter,
16 resulting in a total 30 percent reduction in the
17 regional cap from 2020 to 2030.

18 The Participating States will address
19 the bank of allowances held by the market
20 participants with a third adjustment for bank
21 allowances. The third adjustment will be made over
22 a five-year period, from beginning in 2021 through
23 2025, based upon the size of the bank at the end of
24 2020.



1 Cost Containment Reserve: The
2 Participating States will modify the size and the
3 price triggers for the CCR.

4 The CCR is a reserved quantity of
5 allowances in addition to the cap that would only be
6 available if defined allowance price triggers are
7 exceeded.

8 Beginning in 2021, allowances
9 provided within the CCR will equal 10 percent of the
10 regional cap.

11 The CCR trigger price will be \$13.00
12 in 2021 and rise at 7 percent per year, ensuring
13 that the CCR will only be triggered if emission
14 reduction costs are higher than projected.

15 For the ECR, the Emissions
16 Containment Reserve, Participating States will
17 establish the Emissions Containment Reserve, which
18 is a quantity of allowances that will be withheld
19 from circulation to secure additional emission
20 reductions if the prices fall below the established
21 trigger prices.

22 The states implementing the ECR may
23 withhold up to 10 percent of the allowances in their
24 base budget per year. At this time, Maine and New



1 Hampshire do not intend to implement an ECR.
2 Allowances withheld in this way will not be
3 reoffered for sale.

4 The ECR trigger price will be \$6.00
5 in 2021 and rise accordingly by 7 percent per year,
6 ensuring that the ECR will only be triggered if
7 emission reduction costs are much lower than
8 projected.

9 For the Offset categories, the
10 Participating States will eliminate those two
11 categories, reduction in emissions of sulfur
12 hexafluoride (SF6) in the electric power sector and
13 end-use energy efficiency in the building sector,
14 and update and retain three categories that states
15 may continue to implement. And any awarded offset
16 allowances will remain fully fungible across all
17 states.

18 The Minimum Reserve Price: The model
19 rule retains the language to increase that Minimum
20 Reserve Price by 2.5 percent each year.

21 RGGI's phased approach to reducing
22 emissions, with initially modest emission
23 reductions, is intended to provide market signals
24 and regulatory certainty so that the electricity



1 generators begin planning for and investing in
2 lower-carbon alternatives throughout the region.

3 It is also designed to avoid creating
4 dramatic wholesale electricity price impacts and
5 related retail electricity rate impacts.

6 Additional amendments are to correct
7 typos and provide clarity to the regulatory
8 language.

9 It should be noted that the
10 Department is also submitting tonight an errata
11 document that describes additional edits to correct
12 errors in the original August 1, 2018 Delaware
13 Register publication. Copies of the errata and the
14 regulation with those edits are available at the
15 back of the room.

16 One correction that we would like to
17 bring to your attention is the Delaware State budget
18 in 2026. There is a typo. And the correct amount
19 in Section 5.1.9 should read, "For 2026, the State
20 of Delaware CO2 Budget Trading base budget is
21 2,280,690, and not printed 2,870,690 tons.

22 The Department, along with the other
23 RGGI participating states also conducted modeling to
24 determine the impacts of the proposed program



1 amendments. Macroeconomic modeling and customer
2 bills analysis was conducted in 2017.

3 The nine participating states
4 contracted through RGGI Inc., to hire ICF consulting
5 firm to use its Integrated Planning Model to project
6 electricity sector and economic impacts of the
7 numerous proposed potential policy change scenarios.

8 Impacts of these potential policy
9 change scenarios were compared against the current
10 RGGI program.

11 Sensitivity analyses were conducted
12 to examine impacts resulting from changes to key
13 input variables, such as relative fuel prices and
14 electricity load projections.

15 The IPM model outputs were then used
16 as inputs to the economic analyses including REMI
17 macroeconomic modeling and customer bill impact
18 analyses.

19 The REMI model showed that the
20 regional economic impacts, which are the cumulative
21 change in Gross State Product, cumulative change in
22 employment, cumulative change in real personal
23 income, will result in positive impacts beginning in
24 2021.



1 The proposed regulations are expected
2 to result in positive impacts for all electricity
3 ratepayer bills, and they are expected to actually
4 be lower.

5 The bill impact analysis conducted
6 estimated that the average commercial customer
7 monthly electric bill of 589 would decrease by
8 \$10.67, or 1.8 percent, and the industrial
9 customer's bill will decrease by 2.9 percent.

10 With respect to outreach to our
11 stakeholders and the public, we established a
12 website for this rule making, which Lisa has
13 mentioned, that we will be updating tomorrow, or at
14 least by Friday.

15 The Department scheduled two
16 stakeholder workgroup meetings, one of which was
17 canceled due to snow, and the other which was held
18 on April 17, 2018.

19 A public workshop was held here in
20 Dover on May 21, 2018, which brings us to tonight's
21 proceedings and the public hearing to receive public
22 comment on these proposed amendments for Regulation
23 1147.

24 A final regulation is anticipated to



1 be published by the end of the year on December 1,
2 2018, with the regulation taking effect on
3 December 11.

4 At this time the Department would
5 like to enter into the public record the following
6 technical support document and associated exhibits.
7 Copies of the document will be available on the
8 website.

9 In addition to the Department's
10 documents, we would like to enter into the record
11 all public comment that we received through today
12 via e-mail. And that's in the green folder.

13 For more information on this program,
14 please feel free to contact me. My phone number is
15 739-9402, and my e-mail address is
16 valerie.gray@state.de.us.

17 And this concludes the Department's
18 presentation.

19 MS. VEST: All right. Thank you,
20 Ms. Gray.

21 If somebody could get me the sign-in
22 sheets from in the back.

23 And while she does that, let the
24 record reflect that the white notebook that the



1 Department has provided me has 28 exhibits. They
2 are hereby entered into the formal hearing record
3 being compiled in this matter.

4 Additionally, this folder that, no
5 doubt, will continue to grow containing all the
6 public comments received by the Department in this
7 matter, I will call that Exhibit 29. So 29 total
8 exhibits on behalf of the Department are hereby
9 entered into the formal hearing record.

10 (Ms. Gray hands sign-in sheet to Ms. Vest)

11 Thank you.

12 What I am going to do is I am simply
13 going to go down the list, no preference intended,
14 in the order that people signed up. I will hit the
15 yes, I want to speak first, and then I will go back
16 and ask if anybody else wishes to speak.

17 Due to keeping comment time
18 equivalent and fair, I would ask that your comments
19 be kept to no more than three to five minutes in
20 length.

21 If there are documents that you wish
22 to enter in as an exhibit, I will certainly take
23 them, and then you can spend your time at the
24 microphone simply explaining what you are entering



1 into the record. There is no need to read
2 everything in.

3 That being said, the first name is
4 David Stevenson.

5 MS. GRAY: Your comments were entered
6 in.

7 MR. STEVENSON: Yes, my comments have
8 been entered by e-mail. I'm sorry, Ms. Gray. The
9 5.1.9 is still wrong.

10 MS. GRAY: Oh, okay.

11 MR. STEVENSON: You have got the
12 underline under the wrong number. That's it.

13 MS. GRAY: Okay.

14 MS. VEST: Thank you, Mr. Stevenson.
15 John Nichols.

16 MR. NICHOLS: I won't be quite as
17 brief. My name is John Nichols. I'm a Delaware
18 resident. I live at 406 Meadow Lane.

19 I'm here today to offer public
20 comment about the proposed changes in the Regional
21 Greenhouse Gas Initiative.

22 My first comment is that I do not
23 believe that the Department has the authority to
24 unilaterally change the regulations without going



1 back to the General Assembly.

2 This was challenged in court. Judge
3 Stokes decided not to rule on the merits of the case
4 but, rather, to deny standing to the plaintiffs. In
5 that case he didn't say that they -- that there
6 wasn't merit to the arguments that were raised, but,
7 rather, that the appropriate parties didn't bring
8 the challenge.

9 And the appropriate parties, in Judge
10 Stokes' opinion, would have been the generators like
11 Calpine, NRG, Bloom Energy, whom I believe is
12 excluded from being required to buy carbon
13 allowances under RGGI.

14 With that being said, I don't think
15 generators are willing to step forward and challenge
16 the unilateral action on the part of the Department
17 because they're cowards. They are afraid of the
18 government.

19 That's my first comment.

20 My second comment has to do with
21 carbon dioxide. In general, carbon dioxide is not a
22 pollutant; it is a life-affirming gas. It's been
23 known for decades. I grew up working on a farm.
24 They even had greenhouses, and they used to



1 introduce carbon dioxide into the greenhouses. Back
2 at that time, it was under 400 parts per million in
3 the atmosphere.

4 They found that the optimum level to
5 get maximum growth from the plants was about 1,000
6 parts per million. We are not anywhere close. We
7 are at 400 parts per million.

8 Beyond 1,000 parts per million didn't
9 hurt most of the plants. It just didn't make them
10 grown any faster or absorb water more quickly.

11 CO2 is needed for the photosynthesis
12 process. It creates sugar. Plants create oxygen.
13 We breathe it. And then, after breathing the
14 oxygen, humans use carbon dioxide. That's what's on
15 exhaling, as I make this remark. It's not -- the
16 five-court ruling by the Supreme Court of the United
17 States, most of whom know nothing about science,
18 does not make this subtle science.

19 So I argue CO2 is a pollutant, and
20 RGGI should be eliminated. And I continue to make
21 that argument before the General Assembly.

22 My last comment has to do with the
23 absolute insanity -- I can't think of a better
24 word -- of Delaware trying to do anything to reduce



1 carbon dioxide emissions.

2 For the record -- can you help me,
3 please?

4 MS. GRAY: Oh, absolutely.

5 MR. NICHOLS: I would like you to go
6 and enter that as a live link on the website so that
7 people who go there can view it.

8 What you have is a chart from Our
9 World and Data. Our World and Data is a Department
10 of Energy funded organization that collects data on
11 everything, including carbon dioxide emissions and
12 topogenic, meaning cause.

13 And that chart shows you that in
14 2005, CO2 emissions in the United States peaked.
15 They have been declining, except for a slight peak
16 in 2008, ever since; whereas global CO2 emissions,
17 as the chart indicates, are just continuing to rise,
18 in particular in Asia, China, and India, in
19 particular, are emitting more and more carbon
20 dioxide.

21 So adding additional costs to
22 electricity, which is the ultimate effect of
23 causing, demanding that generators buy more
24 expensive carbon allowances, all that does is raise



1 the cost of electricity and make the U.S. less
2 competitive globally.

3 So I would respectfully suggest that
4 you rethink this regulation and that you not go
5 forward with it. And you ought to understand that
6 you probably don't have the authority.

7 And sooner or later, someone is going
8 to step forward and challenge your authority and
9 take legal action beyond that which is authorized by
10 the General Assembly.

11 This is a tax increase, regardless of
12 how it's -- how the magnitude of it is measured.
13 It's a tax increase. And it requires a super
14 majority of both houses of the General Assembly in
15 Delaware, under the Constitution of Delaware, to
16 enact a tax increase. You can't do it.

17 Now, you have already had a court
18 case. The plaintiffs were dismissed, but the merits
19 of the argument remain. So expect another court
20 case if you proceed with this, and expect further
21 action of the General Assembly.

22 And understand that what you are
23 doing globally is absolutely meaningless and will
24 make job creation more difficult, manufacturing less



1 likely to occur in Delaware and through the other
2 eight states who participate in the program.

3 So I respectfully ask that you
4 rethink this and you not proceed. Thank you very
5 much.

6 MS. VEST: Thank you, Mr. Nichols.

7 And for the record, the chart that he
8 provided me just now entitled "Global CO2 emissions
9 by world region, 1751 to 2015," I am marking and
10 putting into the record as Nichols Exhibit 1. And
11 thank you again, John.

12 Next, Beth from Delaware Sierra Club.

13 MS. CHAJES: Thank you. My name is
14 Beth Chajes. And I'm the co-chair of the Executive
15 Committee of the Delaware Chapter of the Sierra
16 Club.

17 I am pleased to speak today on behalf
18 of the Sierra Club and our 10,000 supporters in
19 Delaware.

20 Our statement has been co-signed by
21 the Acadia Center, the Conservation Law Foundation,
22 Environment America, and the Natural Resources
23 Defense Council.

24 Having participated extensively



1 throughout the 2015 through '17 RGGI program review,
2 our organizations appreciate the considerable effort
3 that went into crafting a model rule that can carry
4 the program through the next decade with such
5 broad-based state and stakeholder support.

6 We urge Delaware to expeditiously
7 incorporate all the changes included in the updated
8 model rule in order to maximize the impact of the
9 RGGI program and the benefits to Delawareans.

10 RGGI continues to provide significant
11 climate, public health and economic benefits to
12 Delaware and the broader region. Compared to a 2008
13 pre-RGGI baseline, power plant carbon dioxide
14 emissions have fallen by more than 50 percent.

15 Most recently, 2017 emissions in the
16 RGGI region declined by 18 percent from 2016 levels.
17 So just one year.

18 Reducing power plant greenhouse gas
19 emissions provides important attendant environmental
20 and public health benefits. Emissions of harmful
21 sulfur dioxide, nitrogen oxides, and particulate
22 matter in the RGGI region have decreased
23 dramatically as a result of RGGI, as well.

24 Abt Associates found that between



1 2009 and 2014, emissions of sulfur dioxide and
2 nitrogen oxides in the RGGI region declined by
3 109,000 tons and 46,000 tons respectively.

4 These declines in criteria pollutants
5 have resulted in improvements in a wide range of
6 public health outcomes, including reductions in
7 asthma ER visits, respiratory hospital emissions,
8 lost work days, and premature mortality.

9 Based on Abt's analysis, avoided
10 health effects in Delaware due to RGGI in its first
11 six years were between \$115 million and
12 \$274 million.

13 Recent analyses by both the Analysis
14 Group and ICF further confirm the continuing
15 economic benefits of Delaware's participation in
16 RGGI.

17 In April, the Analysis Group found
18 that for 2015-2017 compliance period, the RGGI
19 program led to \$1.4 billion of net positive economic
20 activity in the RGGI region, including 14,500 new
21 job years.

22 During this period Delaware received
23 \$43.4 million in auction revenue and increased the
24 economic benefits to the state by investing most of



1 these auction proceeds in energy efficiency and
2 clean renewable energy.

3 Looking forward through 2030, ICS
4 Integrated Planning Model found an increase in job
5 years by 35,000, in gross state product by
6 \$2.79 billion, and in disposable personal income by
7 \$1.45 billion for the years 2017 to 2031.

8 In order to reap the benefits of a
9 strengthened and extended RGGI program, we urge
10 Delaware to expeditiously move forward with adopting
11 all elements of the updated model rule.

12 One of the important new features of
13 the updated model rule is the establishment of the
14 Emissions Containment Reserve. Incorporation of the
15 ECR is critical to maintain the integrity of the
16 regional emissions cap and the robustness of the
17 program moving forward.

18 Actual emission levels in the region
19 have persistently remained below annual RGGI caps,
20 while allowance prices have, with rare exceptions,
21 also remained very low.

22 The ECR helps stabilize the market by
23 preventing the release of excess emissions
24 allowances when prices are low.



1 Removing allowances from the market
2 when lackluster demand results in low prices can
3 also provide greater certainty in the allowance
4 markets.

5 Both of the two previous program
6 reviews have had to address how to handle large
7 banks pf excess allowances.

8 While the RGGI states have wisely
9 elected both times to fully correct for these large
10 banks in future years, the ECR can help prevent the
11 creation of excessive allowance banks in the first
12 place, while countering allowance price suppression
13 in the years between program reviews.

14 In addition to incorporating all of
15 the changes in the updated model rule, we urge
16 Delaware to follow the lead of states like New York
17 and take additional steps to protect environmental
18 justice communities and communities most directly
19 impacted by power plant pollution within the state.

20 In updating its RGGI implementing
21 regulations this year, New York committed to
22 expanding the coverage of the program to include
23 groups of electric-generating units that
24 collectively exceed RGGI's capacity threshold of 25



1 megawatts but do not individually exceed that
2 threshold.

3 These collections of units are
4 frequently located in proximity to environmental
5 justice communities, and requiring them to
6 internalize a portion of their pollutions costs
7 sends a price signal that can help alleviate air
8 quality burdens in nearby communities.

9 In addition, New York has committed
10 to having state agencies engage with the state's
11 Environmental Justice and Just Transition Working
12 Group to ensure that environmental justice
13 communities benefit equitably from the investment of
14 RGGI auction proceeds.

15 We urge Delaware to take similar
16 steps as it updates its RGGI regulations.

17 In sum, as repeatedly shown by
18 analyses of independent economic and health experts,
19 and as documented by the states, themselves,
20 Delaware and the other states in the RGGI region
21 have benefited greatly from their participation in
22 the RGGI program over the past decade.

23 The updated model rule promises to
24 continue providing such benefits over the next



1 decade while continuing to cut dangerous emissions
2 from polluting power plants, and to show much-needed
3 state and regional leadership in the fight against
4 climate change.

5 Accordingly, we urge Delaware to
6 expeditiously adopt all elements of the updated
7 model rule, including the ECR, as well as additional
8 modifications to benefit environmental justice
9 communities, in order to continue to benefit from a
10 robust and thriving RGGI program in the future.

11 Thank you.

12 MS. VEST: Ma'am, did you want to
13 enter that into the record, or -- I mean, you read
14 it in, so it's in.

15 MS. CHAJES: Yeah. I have a version
16 I can give you.

17 MS. VEST: Okay. If you don't have
18 it with you, and you want to send it to me by
19 e-mail, that's fine.

20 (Ms. Chajes hands up a document.)

21 MS. VEST: Coralie Pryde? And while
22 Ms. Pryde is coming up, for the record, the
23 statement just read in now by the Delaware Sierra
24 Club is going to be marked as Delaware Sierra Club



1 Exhibit 1.

2 MS. PRYDE: I'm Coralie Pryde. I'm
3 the Conservation Chair of the Sierra Club of
4 Delaware.

5 I will send in some more prepared
6 comments later. What I did want to respond to
7 tonight were some of the comments by Mr. Nichols.

8 I'm glad he mentioned greenhouse
9 gases and the idea of filling greenhouse gases --
10 greenhouses with carbon dioxide.

11 Studies on this were first done just
12 about 200 years ago. And what was shown is adding
13 the carbon dioxide to the greenhouse not only makes
14 the plants grow faster because they are using carbon
15 dioxide; they also grow faster because the
16 temperature in the greenhouse remains far warmer
17 than it is outside of the greenhouse.

18 And while the amount of carbon
19 dioxide is optimum for plant growth, it is not
20 optimal for human development or health.

21 The effects of the global warming are
22 already obvious to anyone who looks at the
23 scientific record. The earth has been warmer than
24 this, but its rise in temperature has never been as



1 fast as this.

2 And what we are seeing is the utter
3 chaos that arises from that rapid change -- the
4 droughts, the heavy rains such as we have had, more
5 and more super-sized hurricanes.

6 While one can't take a single storm
7 and say this was caused by global warming, one can
8 take a look at the total number compared with
9 averages of other times, and we see this kind of
10 event is increasing.

11 And the hottest ten years on record
12 have all been almost in a row.

13 The whole world is going to have to
14 take part in cutting out greenhouse gas emissions.
15 The U.S. should be taking the lead in doing that,
16 because we do have the technology. The fact is even
17 China is making much faster progress on going toward
18 non-fossil fuel sources.

19 So I totally believe that we should
20 continue the RGGI program. We should tie it to the
21 highest goals possible.

22 And Delaware alone cannot stop global
23 warming. What is sure is, as the globe warms,
24 Delaware is going to be the first state to go under



1 water. And I think we should all keep that in mind.
2 Thank you.

3 MS. VEST: Thank you, Ms. Pryde.

4 At this point I would give one last
5 opportunity. If someone said no initially and
6 wishes to offer comment, now would be your chance to
7 do so.

8 Let the record reflect that no
9 additional comment wishes to be made at this time.

10 Again, as I said at the beginning of
11 tonight's proceedings, I was inclined to extend the
12 normal comment period in this case to give everybody
13 ample and fair opportunity to look at the record and
14 see the documents and the comments that have come
15 in.

16 So, even though we are closing the
17 proceedings tonight, the record will remain open
18 through close of business on Friday, September 28.
19 And any comment that comes in at anytime all bears
20 the same weight.

21 If anyone needs to know how to offer
22 comment, feel free to get a card from me at the
23 conclusion of the proceedings or talk to Ms. Gray
24 directly.



1 But that being said, I want to thank
2 everybody for coming in tonight. This meeting is
3 now adjourned.

4 (Adjourned at 6:39 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 5th day of September 2018.



Lorena J. Hartnett
Registered Professional Reporter

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