

Subject: Clean Power Plan Mass Caps Set Too Low  
From: David Stevenson  
To: "Mirzakhali, Ali (DNREC)" , "Cherry, Philip J. (DNREC)"  
CC:

Since the listening session The EPA released "Translation of the State Specific Rate Based CO2 Mass Based Equivalents" and have asked for comments on the way the goals were calculated. If you use the technical document titled "Goal Computation Data File Appendix 1 and 2" (<http://www2.epa.gov/carbon-pollution-standards/clean-power-plan-proposed-rule-technical-documents>), a spreadsheet with data and formulas for each state, the caps don't match the translation document. Attached is a copy of the file with three columns added (BC, BD, BE) by CRI that compute the caps from the file data, show the caps released this week, and show the percentage difference by state. For Delaware, the translation document cap is 2,972 million tons in 2030. Using the data file calculation the total should be 3,519 million tons. Adding the new Dover NGCC plant at 309 MW capacity to column "K" of the spreadsheet yields a cap of 4,066 million tons.

You may want to add this issue to your comments to the EPA.

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