



Delaware Interfaith Power & Light, Inc.

A Religious Response to Climate Change

www.DelPL.org

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 EPA's Clean Power Plan

These comment are regarding the recommendation of utilizing the CEIP ~~program~~ within Delaware's Proposal for Compliance with the EPA Clean Power Plan.

BACKGROUND

Delaware Interfaith Power & Light is one of 40 state affiliates of the national Interfaith Power & Light (IPL), initiated in California in 1998. DeIPL was founded in 2011, currently has 27 member congregations throughout Delaware and is growing steadily. Our mission is to provide a religious response to climate change through promotion of energy conservation, energy efficiency, renewable energy and environmental justice.

We consider our work - whether sharing scriptures, hosting workshops, distributing eco-kits, expanding green space, coordinating solar energy projects, creating partnerships or meeting with legislators - a moral imperative. Our goal, ultimately, is to assure the preservation of a healthy, sustainable planet; but, closer to home, to improve the everyday quality of life of our families, our neighbors and our communities.

Amongst the Delaware communities hardest hit by climate change and toxic emissions from power plants are those of low-income, which are least responsible for carbon emissions and are thus subjected to environmental injustice. Although there are a number of programs at the federal, state and local levels that attempt to address this injustice, innovative approaches are needed that provide relief and a means to empower these neighborhoods to improve their homes, businesses and lives in the process. We believe that the Clean Energy Incentive Program can play an important part in this empowerment.

The Clean Energy Incentive Program (CEIP), enacted in Delaware, will provide an incentive for early action on renewables and energy efficiency in low-income communities, and can help ensure that investments in clean energy and efficiency are distributed in the communities with the highest barriers to deployment.



Delaware Interfaith Power & Light, Inc.

A Religious Response to Climate Change

www.DelPL.org

Indeed, Delaware has a unique opportunity through our Implementation Plans to craft the energy solutions that work best for the economy, workers, and low income communities of the ~~their~~ state. As such, it has the potential to:

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

As a strategy to reward early action, Delaware's implementation of the CEIP can lay the groundwork to prepare a workforce able to carry out clean energy installations and retrofits over the coming decade and beyond.

Through the CEIP, Delaware will have the opportunity to award early compliance credits (CO2 allowances or Emission Reduction Credits (ERCs)), 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 they produce in the years 2020 and 2021, for which EPA will grant a matching credit. The doubling of ERCs can have an important economic benefit as the EPA estimates that investments in energy efficiency will boost national employment by roughly 120,000 jobs by 2020.

EPA's extra incentives for energy efficiency (EE), ~~or EE~~, programs in low-income communities are particularly important for three reasons. Low-income communities pay a disproportionate burden of energy costs: In fiscal year 2014, low-income households spent an estimated mean of 16.3 percent of their household income on energy costs, compared with 3.5 percent for wealthier households. Low-income communities also disproportionately suffer from coal-fired power plant pollution and the ensuing effects of climate change. Furthermore, without expanding EE—and renewable energy—opportunities beyond upper- and middle-income households, the United States will fail to meet its 2025 carbon pollution reduction goals.

In addressing low income needs, it is also worth noting that energy efficiency is the least costly way for states to meet their pollution reduction targets. According to the EPA, "Demand-side EE [energy efficiency] is an important, cost effective, proven strategy that states are already widely using and which can substantially and cost effectively lower CO2 emissions from the power sector." Delaware's inclusion of CEIP in her implementation of CPP provides a double benefit and should be aggressively pursued.



Delaware Interfaith Power & Light, Inc.

A Religious Response to Climate Change

www.DelPL.org

In summary, Delaware Interfaith Power & Light strongly encourages the committed pursuit of CEIP's in meeting our state's Clean Power Plan goals. Expanding our vision and setting our sights above and beyond reliance on Delaware's participation in the Regional Greenhouse Gas Initiative (RGGI) can offer a critical investment in the health and welfare of our families, the sustainability of our communities *and* the ability of the nation to meet its 2025 carbon pollution reduction goals.

Respectfully,

A handwritten signature in black ink, reading "John Sykes". The signature is written in a cursive style and is placed on a light gray rectangular background.

John Sykes, President

Delaware Interfaith Power and Light