

**LEAGUE OF WOMEN VOTERS OF DELAWARE
2400 W. 17th Street, Clash Wing, Room 1 Lower Level
Wilmington, DE 19806-1311**

October 9, 2013

TO: DIVISION OF AIR QUALITY, DNREC

**FROM: CHARLOTTE KING, PRESIDENT, LWVD
PAT TODD, CHAIR, ENERGY/NATURAL RESOURCES COMMITTEE**

RE: AMENDMENT TO REG. 1147—Carbon Dioxide Budget Trading Program

The League of Women Voters of the United States believes that global climate change is a man-made phenomenon that threatens the integrity of our ecosystem. We therefore, support the reduction of energy consumption growth rates and the reduction of greenhouse gas emissions.

Thank you for this opportunity to comment on the amendment to Regulation 1147. The League of Women Voters of Delaware has followed the Regional Greenhouse Gas Initiative since before its inception when a committee was formed by the General Assembly to determine whether Delaware would join its Northeast neighbors in setting up a cap and trade system to reduce green house gas emissions in our region.

The League of Women Voters of Delaware supports the proposed amendments made to the Regional Greenhouse Gas Initiative (RGGI) Model Rule after the comprehensive review by the nine participating states in 2012. We understand that the updated amendment can be legally accomplished in Delaware by amending the regulation, 7 DE Administrative Code 1147-CO₂ Budget Trading Program.

The League understands that the Delaware updated regs will:

- Reduce by 45% the projected 2020 power sector CO₂ emissions and reduce the new cap of 4,064,687 tons -down from 7,559,787 tons energy consumption before the amendment -- by 2.5% each year from 2015 to 2020.**
- Adjust both old and new auctioned allowance to the RGGI cap.**
- Create a fixed additional supply of allowances in a Cost Containment Reserve (CCR) which would be available for sale if CO₂ allowance prices exceed certain price levels.**
- Include a new forestry protocol.**
- Not reoffer unsold 2012 and 2013 CO₂ allowances.**
- Require regulated entities to acquire and hold a certain number of allowances.**
- Track and deal with imported electricity and its associated emissions.**

Again, the League appreciates this opportunity to support the amendment to Reg. 1147.