

Prettyman Mark A. (DNREC)

From: Howatt Robert (PSC)
Sent: Tuesday, August 17, 2004 3:08 PM
To: Prettyman Mark A. (DNREC); Deramo Alfred R. (DNREC)
Subject: DG Regulation Work Group

Attachments: Regulation No 44 input.doc

Attached are some of my comments with regards to yesterday's meeting. I realize how difficult it is to write a regulation that covers all the circumstances and I think you have done quite well considering where we started. I'm sure there are more issues then I've discussed in my attached notes, but the bottom line is that regulations will change the way we do business and will ultimately cost consumers or taxpayers. It would be a wonderful world if we could somehow provide incentives to ensure that all new DG investment is voluntarily clean, but that doesn't seem likely unless the legislature want to provide significant tax incentives. I know that no one wants to drive any technology out of business but it will obviously be more costly to bring diesel engines into compliance.

I am concerned with the way the regulation is using certain definitions to define mechanisms of usage rather than to define the item itself, but you will see that in my comments. If you have any questions, give me a call.

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Regulation No 44
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