



This comment in regards to register notice number 2015-XX implementation of renewable energy portfolio standards cost cap provisions.

Regarding the total annual cost of compliance, Bloom Energy should not be considered under the cost cap for several reasons:

1. Fuel Cell technology from Bloom Energy are clearly not considered an eligible energy resource as defined in Delaware Code, Title 26, chapter 1 Public Service Commission Subchapter IIIA, Section 352.6.
2. Additionally, section 3 52.20 states that ""Renewable Fuel" means a fuel that it is derived from eligible energy resources. This time does not include a fossil fuel or waste product from a fossil fuel source." Bloom fuel cells are derived from natural gas which is a fossil fuel, sense not an eligible energy resource.
3. As Bloom Energy does not generate any RECs, it cannot be included in the category of REC purchases.
4. DNREC has no statutory authority to freeze Bloom costs and no customers are exempt from Bloom charges.

Regarding the benefits of increased air quality and improved public health, the 2015 state of the air report from the American Lung Association once again race in all three Delaware County a grade of F in high ozone days.

Delawareans with ongoing health problems such as asthma, cardiovascular disease and chronic obstructive pulmonary disease have a higher risk of ending up in the emergency room due to these air quality conditions, says Dr. Albert Rizzo, chief of pulmonary and critical care medicine at Christiana Care Health System.¹ Indeed, five groups of people are especially vulnerable to the effects of breathing ozone: children and teens; anyone 65 and older; people who work or exercise outdoors; people with existing lung diseases, such as asthma and chronic obstructive pulmonary disease (also known as COPD, which includes emphysema and chronic bronchitis); and people with cardiovascular disease.

DELAWARE				AMERICAN LUNG ASSOCIATION STATE OF THE AIR 2015 61					
American Lung Association in Delaware www.lung.org/delaware				AT-RISK GROUPS					
County	Total Population	Under 18	65 & Over	Lung Diseases			Cardio-vascular Disease	Diabetes	Poverty
				Pediatric Asthma	Adult Asthma	COPD			
Kent	149,416	40,827	25,528	3,546	13,720	7,377	11,888	13,962	22,162
New Castle	549,684	122,770	73,542	10,794	45,694	24,904	37,217	44,824	63,555
Sussex	206,649	40,463	48,414	3,558	17,347	11,219	19,372	21,344	30,057
Totals	925,749	203,558	147,484	17,898	76,461	43,299	68,477	80,179	115,774

¹ Delaware's air: An 'F' for ozone, The News Journal, April 29, 2015



Delaware Interfaith Power & Light, Inc.
A Religious Response to Climate Change
www.DelawareIPL.org

According to the US Environmental Protection Agency, "In the Earth's lower atmosphere, near ground level, ozone is formed when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight. Ozone at ground level is a harmful air pollutant."

Instituting a Cost Cap on RPS without considering the deleterious health effects of ozone, which continues to reach dangerous levels, is clearly contrary to the intent of Subchapter III-A of Title 26.

Delaware Interfaith Power & Light (DeIPL) is a religious nonprofit made up of 26 congregations of many faiths across Delaware. The total members of our congregation are over 10,000, and if located in one place would be the fifth largest city in Delaware. Our mission is to provide a religious response to climate change, which very often translates to the smarter use of energy. Our outreach takes us from some of the poorest neighborhoods in Wilmington to rural Sussex County to the Delaware beach areas and to communities in New Castle County. Our work is to provide our congregations, they are members and their neighbors with education, knowledge and access to tools and programs that will empower them to reduce their energy use, lower their expenses and help address the climate crisis that is upon us.

Respectfully Submitted,

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