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December 10, 2015

Donna Nickerson, Secretary
Delaware Public Service Commission
Cannon Bldg., Ste. 100
861 Silver Lake Blvd.
Dover, DE 19904

RE: Application for Approval of the 2016 Program for the Procurement of Solar Renewable Energy Credits, Docket No. 15-1472

Dear Secretary Nickerson:

I am writing on behalf of the State of Delaware, Department of Natural Resources and Environmental Control (“DNREC”) in support of Delmarva’s request to postpone the Commission’s consideration of Delmarva’s Application for Approval of the 2016 Program for the Procurement of Solar Renewable Energy Credits and to cancel the evidentiary hearing that is scheduled for December 15, 2015. DNREC, which is a member of the Renewable Energy Task Force that voted to recommend Delmarva’s application, agrees that the Commission should postpone its consideration of Delmarva’s application until after the regulations on the Implementation of the Renewable Energy Portfolio Standards Cost Cap Provisions (“Cost Cap Rules”) are final in early 2016.

In addition to Task Force members such as DNREC, Delmarva, and Staff, the Delaware Solar Energy Coalition also supports Delmarva’s request that the Commission postpone the evidentiary hearing until after the Cost Cap Rules are final. I have attached a letter from Dale Davis indicating the Delaware Solar Energy Coalition’s support.

Respectfully,

/s/ Devera B. Scott

Devera B. Scott
Deputy Attorney General

DBS/hs



December 9, 2015

Delaware Public Service Commission
c/o Donna Nickerson, Secretary (Donna.Nickerson@state.de.us)
861 Silver Lake Boulevard, Suite 100
Dover, DE 19904

Re: PSC Docket No. 15-1472: Request of Applicant to Cancel Evidentiary Hearing and Postpone
Consideration of Application for Approval of 2016 Program for Procurement of Solar Renewable Energy Credits

Dear Commissioners and Secretary Nickerson,

I am writing on behalf of the Delaware Solar Energy Coalition (DSEC), an organization which represents the interests of the solar community – installers, manufacturers, and system owners. DSEC represents the solar community on the Renewable Energy Task Force.

We support the request of Delmarva Power & Light Company to postpone consideration of DPL's Application for Approval of its 2016 Program for Procurement of Solar Renewable Energy Credits and to cancel the evidentiary hearing scheduled for the Commission meeting on Tuesday, December 15, 2015, at 1:00pm.

DNREC is in the process of promulgating regulations governing the Implementation of the Renewable Energy Portfolio Standards Cost Cap Provisions ("Cost Cap Rules"). The final comment period closed yesterday. The Cost Cap Rules and the calculation to be made using them can reasonably be expected to influence the Commission's decision regarding the Docket for 2016 Procurement Program.

In order to ensure robust participation in the 2016 procurement auction, the solar community needs a reasonable level of certainty that the auction will be conducted, due to the expense of developing projects in preparation for making bids. A robust auction increases competitiveness and results in overall lower SREC prices.

It is expected that the Cost Cap Rules will be final, and the calculation completed early in the New Year. It is appropriate to delay consideration of the Application until the Cost Cap Rules are final and to cancel the currently scheduled evidentiary hearing.

We appreciate the opportunity to respond regarding the request to postpone Delmarva's Application for Approval. We would be pleased to provide further comments and answer questions the Commissioners or staff may have. Thank you for the work you do on behalf of the consumers of Delaware and your commitment to public service.

Warm Regards,

Dale W. Davis
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CC:

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