

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF INTEGRATED RESOURCE)
PLANNING FOR THE PROVISION OF STANDARD)
OFFER SERVICE BY DELMARVA POWER &) PSC DOCKET NO. 10-2
LIGHT COMPANY UNDER)
26 DEL. C. §1007(c) & (d))
(OPENED JANUARY 11, 2011))

STAFF MOTION TO MODIFY SCHEDULE APPROVED IN ORDER NO. 7888

The Staff of the Delaware Public Service Commission (“Staff”), by and through its counsel, hereby moves the Delaware Public Service Commission (the “Commission”) to modify the schedule for submission of comments to the Integrated Resource Plan (“IRP”) filed by Delmarva Power & Light Company (“Delmarva” or the “Company”) on December 1, 2010 and for Delmarva’s reply comments (if any), and in support thereof states as follows:

1. On December 1, 2010, Delmarva filed its statutorily-required IRP. On January 11, 2011, by Order No. 7888, the Commission opened this docket, set an intervention deadline, and also established the following dates for the submission of comments on the IRP:

- March 31, 2011: Interested parties and entities
- April 29, 2011: Delmarva reply comments

The Commission also designated Senior Hearing Examiner Ruth Ann Price to conduct or supervise any proceedings as she deemed necessary or appropriate to construct an adequate record, and directed Senior Hearing Examiner Price shall submit a Report with her proposed findings and, if necessary, recommendations concerning what action(s) the Commission should take in response to the IRP.

2. Calpine Corporation (“Calpine”), the Delaware Department of Natural Resources and Environmental Control (“DNREC”), the Delaware Energy Users Group (“DEUG”), the Mid-Atlantic Renewable Energy Coalition (“MAREC”), NRG Energy, Inc. (“NRG”) and the Delaware Chapter of the Sierra Club (the “Sierra Club”) filed petitions for intervention, which

Senior Hearing Examiner Price granted. The Caesar Rodney Institute has filed a petition for leave to intervene out of time, which the Hearing Examiner has not yet ruled upon as of the filing of this Motion.

3. Since the filing of the IRP, Staff has received numerous inquiries from members of the public. In light of the number of inquiries and the complexities of the issues those inquiries have raised, Staff determined that it would be in the public interest to conduct at least one, and perhaps more, workshops to discuss the IRP and to answer questions that the intervenors might have. While Staff sought to conduct such workshops prior to the March 31, 2011 deadline for comments, the participants' schedules would permit only one workshop to be held before that deadline. That workshop will be held on Monday, March 14, 2011.

4. Consequently, Staff sought the agreement of all intervenors and Delmarva to request the Commission to vacate the deadlines established in Order. No. 7888 and to allow the Hearing Examiner to establish a schedule in consultation with the parties after some workshops had been conducted. Calpine, DNREC, DEUG, MAREC, NRG and the Sierra Club all consented to Staff's request. Delmarva does not oppose a reasonable extension, but cautioned that the docket should be concluded within a reasonable time frame, and states that this docket "must be concluded (by final Commission order)" before Delmarva begins preparing its 2012 IRP, which "will begin in a few months." (E-mail correspondence from Todd L. Goodman to Regina A. Iorii dated March 3, 2011). Therefore, Delmarva suggests that, rather than vacating the deadlines in Order No. 7888 and leaving it open-ended, the Commission should instead set definitive deadlines for the submission of comments, which would take into account the conduct of workshops. (*Id.*).

5. Staff acknowledges that the IRP was filed in early December 2010 and that interested entities have had some time to examine it. However, Staff further observes that the intervention deadline only recently expired, and the questions that are being raised demonstrate a

need for workshops for Delmarva to respond to these questions, as well as allow Delmarva to explain to the intervenors certain results of the scenario modeling in the IRP. Staff believes that a desire to conclude the docket quickly must be balanced with the need to review and understand the IRP that was filed. Staff notes that it intends to publish the date(s), location(s) and time(s) of such workshops on the Commission's website.

WHEREFORE, for the reasons discussed above, Staff respectfully requests the Commission to enter an order in the form attached hereto extending the date for filing comments on the IRP to May 31, 2011, extending the date for Delmarva to file its reply comments, if any, to June 30, 2011, and permitting the Hearing Examiner to modify the schedule without further Commission consent for good cause shown.

Respectfully submitted,

/s/ Regina A. Iorii

Regina A. Iorii (#2600)
Deputy Attorney General
Delaware Public Service Commission
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8159 (Wilmington)
(302) 736-7510 (Dover)
regina.iorii@state.de.us

Dated: March 10, 2011

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF INTEGRATED RESOURCE)	
PLANNING FOR THE PROVISION OF STANDARD)	
OFFER SERVICE BY DELMARVA POWER &)	PSC DOCKET NO. 10-2
LIGHT COMPANY UNDER)	
26 <i>DEL. C.</i> §1007(c) & (d))	
(OPENED JANUARY 11, 2011))	

ORDER NO.

AND NOW, this 22nd day of March, 2011:

WHEREAS, by Order No. 7888 dated January 11, 2011, the Delaware Public Service Commission (the Commission”) opened this docket to consider the Integrated Resource Plan (“IRP”) filed by Delmarva Power & Light Company (“Delmarva” or the “Company”) on December 1, 2010; and

WHEREAS, in Order No. 7888 the Commission established a deadline of March 31, 2011 for the submission of comments on the IRP and April 29, 2011 for Delmarva reply comments, if any; and

WHEREAS, the intervention period expired on February 23, 2011; and

WHEREAS, on March 10, 2011 the Commission Staff (“Staff”) filed a Motion to Modify the Schedule Approved in Order No. 7888, stating that additional time was needed to conduct public workshops to discuss the IRP, and requesting that the Commission modify the deadlines established in Order No. 7888 by extending the deadline for filing of comments and reply comments for 60 days, and provide the Hearing Examiner with the authority to modify the schedule if necessary for good cause shown; and

WHEREAS, the Commission met in public session on March 22, 2011 to consider Staff’s motion and hear any additional comments from the intervenors in the docket;

**NOW, THEREFORE, IT IS HEREBY ORDERED BY THE AFFIRMATIVE VOTE OF
NO FEWER THAN THREE COMMISSIONERS:**

1. That Order No. 7888 is amended to extend the deadline for filing comments to the IRP until May 31, 2011, extend the deadline for filing of Delmarva's reply comments, if any, until June 30, 2011, and provide the Hearing Examiner with the authority to amend the schedule further for good cause shown.

2. That the Hearing Examiner has the authority to address all scheduling matters for the duration of this docket.

3. That the Commission reserves the jurisdiction and authority to enter such further orders and may be deemed necessary or appropriate.

BY ORDER OF THE COMMISSION:

Chair

Commissioner

Commissioner

Commissioner

Commissioner

ATTEST:

Alisa Carrow Bentley
Secretary

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF INTEGRATED RESOURCE)	
PLANNING FOR THE PROVISION OF STANDARD)	
OFFER SERVICE BY DELMARVA POWER &)	PSC DOCKET NO. 10-2
LIGHT COMPANY UNDER)	
26 <i>DEL. C.</i> §1007(c) & (d))	
(OPENED JANUARY 11, 2011))	

CERTIFICATE OF SERVICE

Regina A. Iorii hereby certifies that on March 10, 2011, she caused a copy of the **STAFF MOTION TO MODIFY SCHEDULE APPROVED IN ORDER NO. 7888** to be served on the persons on the attached service list in the manner indicated thereon.

/s/ Regina A. Iorii _____
Regina A. Iorii (#2600)
Deputy Attorney General
Delaware Public Service Commission
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8159 (phone) (Wilm.)
(302) 736-7510 (phone) (Dover)
regina.iorii@state.de.us

Dated: March 10, 2011

SERVICE LIST
DP&L'S 2010 INTEGRATED RESOURCE PLAN

PSC Docket No. 10-2
[Revised as of March 3, 2011]

<p><u>Hearing Examiner</u></p>	<p><u>PSC Staff</u></p>
<p>BY ELECTRONIC MAIL AND BY HAND</p> <p>Ruth A. Price, Esquire Delaware Public Service Commission 861 Silver Lake Blvd., Suite 100 Dover, Delaware 19904 Telephone: 302-736-7534 (Dover) 302-577-5014 (Wilmington) Monica Hall, Paralegal Tele: 302-736-7564 Fax: 302-739-5258 (Dover) 302-577-2694 (Wilmington) E-Mail: ruth.price@state.de.us monica.hall@state.de.us</p>	<p>BY HAND – ORIGINAL PLUS 10 COPIES</p> <p>Alisa Bentley, Secretary to the Commission Delaware Public Service Commission 861 Silver Lake Blvd., Suite 100 Dover, Delaware 19904 Tele: 302-736-7511 Fax: 302-739-4849 E-Mail: alisa.bentley@state.de.us</p>
<p><u>PSC Staff</u></p>	<p><u>PSC Staff</u></p>
<p>BY ELECTRONIC MAIL AND BY HAND</p> <p>Janis Dillard, Deputy Executive Director Delaware Public Service Commission 861 Silver Lake Blvd., Suite 100 Dover, Delaware 19904 Phone: 302-736-7542 Fax: 302-739-4849 E-Mail: Janis.dillard@state.de.us</p> <p><u>E-Mail distribution only:</u> William O'Brien, Executive Director William.obrien@state.de.us</p>	<p>BY ELECTRONIC MAIL AND BY HAND AS TO ALL</p> <p>Susan B. Neidig, Regulatory Policy Administrator Pamela A. Knotts, Public Utilities Analyst John Farber, Public Utilities Analyst Delaware Public Service Commission 861 Silver Lake Blvd., Suite 100 Dover, Delaware 19904 Neidig Tele: 302-736-7537 Stewart Tele: 302-736-7532 Farber Tele: 302-736-7565 Fax: 302-739-4849 E-Mail: susan.neidig@state.de.us pamela.knotts@state.de.us john.farber@state.de.us</p>
<p><u>PSC Staff Counsel</u></p>	<p><u>PSC Staff Consultant</u></p>
<p>Regina A. Iorii, Esquire Deputy Attorney General - Civil Public Service Commission Elbert N. Carvel State Office Building 820 N. French Street Wilmington, DE 19801 Telephone: (302) 577-8159 (Wilmington) (302) 736-7510 (Dover) E-mail-regina.iorii@state.de.us</p> <p>BY ELECTRONIC MAIL AND BY HAND</p> <p>Julie (Jo) M. Donoghue, Esquire Deputy Attorney General Delaware Department of Justice 820 North French Street, 6th Floor Wilmington, DE 19801 (302) 577-8348 (phone) E-mail- jo.donoghue@state.de.us</p>	<p>BY ELECTRONIC AND REGULAR MAIL</p> <p>Robert Fagan Synapse Energy Economics 22 Pearl Street Cambridge, Massachusetts 02139 Phone: 617-661-3248 Ext. 240 Fax: 617-661-0599 E-Mail: rfagan@synapse-energy.com</p>

<p><u>Division of the Public Advocate</u></p>	<p><u>Delmarva Power & Light Company</u></p>
<p>BY ELECTRONIC AND STATE MAIL</p> <p>Michael Sheehy, Deputy Public Advocate Division of the Public Advocate 820 N. French Street, 4th Floor Wilmington, DE 19801 Phone: 302-577-5077 Sheehy: 302-577-5078 Williams: 302-577-5076 Fax: 302-577-5076 E-Mail: michael.sheehy@state.de.us; kishon.williams@state.de.us</p>	<p>BY ELECTRONIC AND REGULAR MAIL</p> <p>Todd L. Goodman, Esquire Assistant General Counsel [Claudine B. Vazquez-Legal Assistant] 800 King Street, P. O. Box 231 Wilmington, Delaware 19899 Goodman Phone: 302-429-3786 Vazquez Phone: 302-429-3311 Fax: 302-429-3801 E-Mail: todd.goodman@pepcoholdings.com; claudinevazquez@pepcoholdings.com</p>
<p><u>Division of the Public Advocate</u></p>	<p><u>Delmarva Power & Light Company</u></p>
<p>BY ELECTRONIC AND STATE MAIL</p> <p>Andrea Maucher, Public Utilities Analyst Delaware Department of State of Delaware Division of the Public Advocate John G. Townsend Building 401 Federal Street, Suite 3 Dover, Delaware 19901 Phone: 302-857-4620 Fax: 302-739-3811 E-Mail: andrea.maucher@state.de.us</p>	<p>BY ELECTRONIC AND REGULAR MAIL</p> <p>James Demarest PHI-Delmarva Power – Edison Place 701 Ninth Street, NW, 6th Floor Room 6605 Washington, D.C. 20068 Phone: 202-872-3425 E-Mail: jjdemarest@pepco.com</p>
<p>Attorney General – Counsel</p>	<p><u>E-Mail distribution only:</u> bill.mitchell@pepcoholdings.com len.beck@pepcoholdings.com mark.finfrock@pepcoholdings.com gary.stockbridge@pepcoholdings.com jebarrar@pepco.com jbnutter@pepco.com wrswink@pepco.com rjreuter@pepco.com gljohnson@pepco.com mscheller@icfi.com</p>
<p>BY ELECTRONIC AND STATE MAIL</p> <p>Kent Walker, Esquire, Deputy Attorney General Department of Justice 820 N. French Street, 6th Floor Wilmington, DE 19801 Tel. 302-577-8306 Fax: 302-577-6630 E-mail: kent.walker@state.de.us</p>	

<u>INTERVENORS</u>	
NRG Energy, Inc.	Mid-Atlantic Renewable Energy Coalition (MAREC)
<p>BY ELECTRONIC AND REGULAR MAIL AS TO BOTH</p> <p>Julie L. Friedberg, Esquire General Counsel- Northeast Region Abraham Silverman, Esquire NRG ENERGY, Inc 211 Carnegie Center Princeton, NJ 08540</p> <p>Tele: (Friedberg) 609-524-5232 Tele: (Silverman) 609-524-4696 Fax: (Friedberg) 609-524-5160 Fax: (Silverman) 609-524-4589 E-Mail: Julie.friedberg@nrgenergy.com abraham.silverman@nrgenergy.com</p>	<p>BY ELECTRONIC AND EGULAR MAIL</p> <p>Bruce H. Burcat, Esquire Executive Director Mid-Atlantic Renewable Energy Coalition 208 Stonegate Way Camden, DE 19934 Tele: (302) 331-4639 Email: bburcat@marec.us</p>
DNREC	DNREC- COUNSEL
<p>BY ELECTRONIC AND STATE MAIL</p> <p>Philip J. Cherry Department of Natural Resources and Environmental Control Richardson & Robbins Building 89 Kings Highway Dover, DE 19901 Tel: (302)739-9000 Fax: (302) 739-6242 E-Mail: Philip.cherry@state.de.us</p>	<p>BY ELECTRONIC AND STATE MAIL</p> <p>Valerie M. Satterfield, Esquire Deputy Attorney General Department of Justice 102 W. Walter Street, 3rd Floor Dover, DE 19904 Tel. 302-739-4636 Fax: 302-739-4624 E-mail: Valerie.satterfiled@state.de.us</p> <p><u>E-Mail distribution only:</u> Judy.hodas@state.de.us Robert.clausen@state.de.us</p>
Calpine Corporation- Counsel	Calpine Corporation
<p>BY ELECTRONIC AND REGULAR MAIL AS TO ALL</p> <p>P. Clarkson Collins, Jr., Esquire Nicholas J. Caggiano, Jr., Esquire Patricia A. Winston, Esquire Morris James LLP 500 Delaware Avenue, Suite 1500 Wilmington, DE 19899-2306 Tele: 302-888-6800 Fax: 302-571-1750 Email: pcollins@morrisjames.com ncaggiano@morrisjames.com pwinston@morrisjames.com</p>	<p>BY ELECTRONIC AND REGULAR MAIL</p> <p>Sarah G. Novosel Senior Vice President and Managing Counsel Calpine Corporation 1401 H Street, NW Washington, DC 20005 Tele: (202) 777-7623 Email: snovosel@calpine.com</p>

Calpine Corporation	DEUG
BY ELECTRONIC AND REGULAR MAIL John Citrolo Manager, Government and Regulatory Affairs Calpine Corporation 500 Delaware Avenue Wilmington, DE 19801 Tele: (302) 295-4869 Email: john.citrolo@calpine.com	BY ELECTRONIC AND REGULAR MAIL Michael J. Quinan, Esquire Christian & Barton, L.L.P. 908 East Main Street, Suite 1200 Richmond, Virginia 23219 Phone: 804-697-4149 Fax: 804-697-6149 E-Mail: mquinan@cblaw.com
SIERRA CLUB	Caesar Rodney Institute
BY ELECTRONIC AND REGULAR MAIL Kenneth T. Kristl, Esquire Environmental and Natural Resources Law Clinic Widener University School of Law 4601 Concord Pike Wilmington, DE 19803 Tele: (302) 477-2053 Fax: (302) 477-2032 Email: ktcrisl@widener.edu	BY ELECTRONIC AND REGULAR MAIL David T. Stevenson Director, Center for Energy Competitiveness Caesar Rodney Institute P.O. Box 795 Dover, DE 19903 Tele: (302) 236-2050 Fax: (302) 645-9017 Email: davidstevenson@caesarrodney.org