

Alisa  
Janis  
Susan  
Joe  
Mark  
Ferber

Ms. Bentley,

Please note the contained comments in regards to Community Generation and Net Energy metering, for filling with commission. These comments pertain to the docket noted below. You will find the original plus ten additional copies as required.

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DELAWARE P.S.C.

Thank you,

Finn McCabe

Delaware Solar Energy Coalition

You may contact me with any questions at 410-422-8506

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE

IN THE MATTER OF THE ADOPTION OF )  
RULES AND REGULATIONS TO IMPLEMENT )  
THE PROVISIONS OF 26 DEL. C. CH. 10 )  
RELATING TO THE CREATION OF A )  
COMPETITIVE MARKET FOR RETAIL ) PSC REGULATION DOCKET NO. 49  
ELECTRIC SUPPLY SERVICE (OPENED )  
APRIL 27, 1999; RE-OPENED JANUARY )  
7, 2003; RE-OPENED SEPTEMBER 22, )  
2009; RE-OPENED SEPTEMBER 7, 2010) )

ORDER NO. 7832

Pursuant to order no. 7832 The Delaware Solar Energy Coalition (DSEC) wishes to provide comment in support of the proposed regulatory changes. The comments provided below are intended to recommend clarifications and provide for efficient implementation of said changes. Furthermore DSEC wishes to reserve the right to comment on the proposed amendments of other intervening parties.

In the interest of clarification DSEC recommends additional review of the following clauses

*"8.5.1 DP&L shall only allow meter aggregation for customer accounts of which it provides electric supply service;"*

DP&L shall only allow meter aggregation for customer accounts for which it provides electrical distribution service. Customers receiving electric supply service from a third party should not be prohibited from participating in Community generation.

*"8.6.1 A community includes customers sharing a unique set of interests;"*

No definition of a "unique set of interests" has been provided. Nor is there a process for evaluating such interests. A misinterpretation of this clause could result in the unintended disqualification of a facility. This issue could be rectified by defining "a unique set of interests", but this could prove a daunting task. Absent such clarification, or an acceptable mechanism for evaluating each potential community on a case by case basis, DSEC recommends this be struck from the regulations entirely.

DSEC wishes to ensure all aspects of the regulations reflect the intent of the legislation. Therefore we respectfully request the consideration of the following issues.

1. No limitations should place on the number of customers allowed to participate in a community generation facility, as any such limitation is absent in the regulation.

2. A community energy facility shall be given equivalent treatment to a facility designed for on site consumption of the energy produced. This will prevent unintended regulatory consequences such as PJM interconnection studies, and Violation of OATT.

3. Community Energy Facilities shall not be subject to any discriminatory rate treatment or other additional charges.

4. A single interconnection application, compliant with Title 26 as regards community solar, should be required for the host meter. Applications for each individual participating customer should not be required.

Finn McCabe



On behalf of the Delaware Solar Energy Coalition

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