May 31, 2011

Via Hand Delivery

Alisa Bentley, Secretary
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100

Dover DE 19904

Re: Delaware PSC Docket No. 10-2

Dear Ms. Bentley:

Attached please find an original and 15 copies of my Comments in the above referenced proceeding.

Yours truly

John E. Greer Jr, P.E.

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COMMENTS ON DELMARVA POWER 2010 IRP – John E. Greer, Jr., P.E. May 31, 2011.

The results from the "Air Quality and Health Impacts Assessment of Alternative Energy Generation for Delmarva Power & Light's 2010 Integrated Resource Plan" prepared by Delmarva's consultant ICF International have been misinterpreted to claim that alternative energy generation in Delaware will have a large positive impact on air quality and health in Delaware.

However, examination of the consultant's full report in Appendix 6 shows that this is not the case. The improvements in air quality from 2010 to 2020 are from factors other than alternative energy generation in Delaware.

These factors assumed in the modeling are "implementation of emission control technologies, following state and federal rule requirements, the shutting down of older facilities, fleet turnover of on-road motor vehicles and off-road equipment, the introduction of cleaner engine technologies, and the use of cleaner fuels." (Appendix 6 page vi).

The modeling indicates that "For the offshore wind alternative scenario (S1), annual average PM2.5 concentrations are slightly higher throughout the region of interest (including in Delaware)...The increases appear to be due primarily to increases in emissions outside the 4-km grid region)". (Appendix 6 page vi).

Wind farm Scenario S1 "has a relatively small but negative impact on health benefits for Delaware in 2020 mainly due to increased emissions outside of the 4-km grid." (Appendix 6 page 7-6).

"In summary, the air quality and health effects modeling results indicate improvements in air quality between 2010 and 2020 due to expected changes in emissions from all sources, including EGUs...The modeling results also indicate that the environmental impacts and health-related costs/benefits associated with the alternative energy production sources considered in this study are small compared to the changes from 2010 to 2020." (Appendix 6 page 7-6).

Figures 3-1a and b and the accompanying discussion indicate that the contribution of Electrical Generation in Delaware in 2020 to air pollution is "very small" to "negligible". The main contributions are from other sources. (Appendix 6 page 3-6).

In summary, the "Air Quality and Health Impacts Assessment" indicates that alternative energy generation in Delaware will have "very little", "negligible", or "slightly negative" impact on air quality and health and does not justify the high cost.

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