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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE

IN THE MATTER OF THE APPLICATION OF DELMARVA POWER AND LIGHT COMPANY FOR APPROVAL OF THE 2014 PROGRAM FOR THE PROCUREMENT OF SOLAR RENEWABLE ENERGY CREDITS (FILED JANUARY 27, 2014)	)	PSC DOCKET NO. 14-41

PETITION OF THE DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL FOR LEAVE TO INTERVENE

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission, the State of Delaware Department of Natural Resources and Environmental Control ("DNREC") hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, DNREC states the following:

1. On January 27, 2014, Delmarva Power & Light filed an application with the Commission seeking approval of the 2014 Program for the Procurement of Solar Renewable Energy Credits. The Commission set March 21, 2014, as the deadline for filing petitions to intervene.

2. DNREC is an agency of the State of Delaware, created pursuant to 29 *Del. C.* § 8001, *et seq.* DNREC's mission "is to ensure the wise management, conservation, and enhancement of the State's natural resources, protect public health and the environment, provide quality outdoor recreation, improve the quality of life and educate the public on historic, cultural, and natural resource use, requirements and issues."

3. DNREC's contact information, pursuant to Rule 21(i) of the Commission's Rules of Practice and Procedure, is as follows:

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4. Delmarva Power's application seeks approval for its proposed program for the procurement of solar renewable energy credits ("SRECs"). The proposed program was developed by the Renewable Energy Taskforce, which is chaired by the Energy Program Administrator of DNREC's Division of Energy & Climate.

5. DNREC's interest in the outcome of this proceeding is supporting the implementation of a stable and sustainable SREC market that meets the requirements and policy objectives of the Renewable Energy Portfolio Standards Act ("REPSA").

6. REPSA establishes the Renewable Energy Taskforce, which according to statute is staffed by the Division of Energy & Climate. The Division's Energy Program Administrator is the acting chair of the Taskforce.

7. DNREC intervened in similar dockets in 2011 (PSC Docket No. 11-399) and 2012 (Docket No. 12-526).

8. DNREC's interest will not be adequately represented by any of the other parties to this proceeding. DNREC has statutory responsibility for the oversight and development of renewable energy markets in Delaware. In that respect, no other participant in this proceeding has the same obligation to promote renewable energy in Delaware.

9. DNREC's participation in the proceeding would be in the public interest. The public relies upon DNREC to provide guidance and expertise in developing and managing renewable energy markets in Delaware.

10. For the foregoing reasons, DNREC respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

/s/ Devera B. Scott

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Attorney for the Department of Natural Resources and Environmental Control

Dated: March 21, 2014

CERTIFICATE OF SERVICE

I certify that on March 21, 2014, I caused the *Petition for Leave to Intervene of the Department of Natural Resources and Environmental Control* to be served by Electronic Mail to the attached service list:

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

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SERVICE LIST – DOCKET NO. 14-41

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