

PECO petition - PECO DSP Petition to the PUC (Docket # P-2020-3019290)

Tuesday June 9 at 10 am. Hearing in front of Judge Eranda Vero

Thank you for this opportunity to speak. I am Nancy Boxer, Director of the Association for Climate Health.

PECO states their obligation for the default service option is not simply to provide the least cost but includes a mix of products based on “price volatility ... and the need to assure safe and reliable service.”

The Association for Climate Health supports this thoughtful interpretation.

Given these considerations, we are **surprised** that PECO is aiming to secure less than 1% of its power from alternative energy sources. We feel this **tiny** share of renewables does **not** represent a prudent mix of contracts, from reliability **or** cost considerations.

- **Cost** – Solar, for example, used to be pricey. But improvements have made solar **less** expensive even than natural gas. Yes, current market conditions have shifted the advantage again, but it may easily shift back. Solar prices have actually become **more** stable, reliable and predictable than other fuels, in that they have been declining slowly and steadily for decades. Whereas recently coal, oil and gas have suffered **substantial** market fluctuations. We feel it would be foolish to limit solar to 0.5% when it may easily resume its status as the **least cost solution** during the hours of peak demand. **More solar** is the best way to hedge your bets in terms of cost.
- **Prudence and reliability** – most scientists agree that global warming causes major disruption and instability in many areas – agriculture, extreme weather, unexpected catastrophes. Solar contributes to this instability in **minimal** ways, while the fossil fuels contribute to this instability in **major** ways. Additionally, solar and wind have very different risk profiles than nuclear or fossil fuels. Coal is subject to disruptions when miners go on strike or trains derail. Oil becomes hard to buy when war breaks out in the Middle East, or when refineries in America experience fire or other hazards. Nuclear has rare but deadly shutdowns and is a potential terrorism target. Yes, solar and wind are subject to weather fluctuations but are **less subject** to accident, war, market disruptions and other risks. So, **minimizing** renewables is **not** a prudent option. Moving to **substantially increase solar** offers different patterns of risk, increasing reliable supplies of power when more traditional plants go down, and so is the more prudent option.

Thank you for your attention.