Dr. Nees,

Mirant Corporation thanks you for the opportunity to review your proposed RGGI Study for the State of Maryland and have the following comments:

* Inadequate stakeholder process to date:
  1) Website mentions outreach to stakeholders in August but website not available until September 7
  2) Outreach should be through meetings not via conference calls and more time should be spent on stakeholder input

* Severely inadequate time to review and comment on modeling assumptions and process. We request more time to examine the materials in greater detail.
* The study needs to make it clear that RGGI goes beyond the 6 power plants that are included in the Healthy Air Act. It's all fossil fueled electric generating units in the state. In addition, the study needs to address the difference between Maryland and the original RGGI State in its use of coal to produce electricity. I believe the numbers are something like 40% in MD and less than 10% in the rest of RGGI combined. Therefore, you would expect to have a bigger impact on MD as a result. If not, it needs to be explained in the report.
* The study needs to say something about the leakage issue and the 25% set aside. It looks like study assumption will be 25% set aside and 75% give away at this point. Also the study needs to look at how both issues will affect the availability of credits (which the study is suppose to address).
* The study needs to come up with some modeling protocol and show the model performance standards they are using. At this point it looks like the models are just going to be run without the appropriate documentation, which MDE would not let anyone do in the field.

Model Assumptions:
* What years is the Annual Energy Outlook for 2006 based on? PJM's demand growth information would be more accurate based on what really happening in this area.
* For cost regions, if only the RGGI states are looked at, the effects of a regulated region will be ignored and leakage will not be properly addressed.
* As stated above, we need more info on just how good the models they are using are.
* Besides future transmission changes, the study also needs to look at the potential for additional generation in the region and the effects it might have.