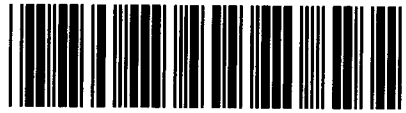


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2015 - the earliest date that most new generation could be constructed. This delay would both reduce the impact on existing contracts and ensure that the increased costs are directed, and therefore most efficiently used, towards attracting new generation investment.

CES also requests that the Commission consider proposals that carefully balance the need for new generation with the impact that higher energy costs might have on customer electric bills and the resulting impact on the state's economy. With this in mind, any proposal to incentivize new generation should balance the additional costs required for new generation to be built with the resulting impact on customers and the economy. The pending Brattle Report should provide insight to this and may help inform future Commission decisions.

Finally, CES believes that near-term resource adequacy is primarily a problem affecting only a handful of hours and one that current energy efficiency and demand response technologies can address far more quickly and economically, than building new generation. As such, CES requests that the Commission consider continuing to make every possible effort to facilitate the expansion of current demand response and energy efficiencies programs. In particular, the Commission should consider steps that create more market transparency, longer response times, and remove program caps and restrictions that currently limit participation in these valuable programs.

CES appreciates every effort made thus far. To improve resource adequacy with the least contract disruption, CES respectfully requests that the Commission defer implementation of proposals aimed at the SWCAP and PBPC until 2015 and target nearer term solutions that incent demand-side reductions and efficiencies. This combination would still send the appropriate price signals within a timeframe that developers can respond to and result in improved reliability at a lower cost to consumers.

Respectfully submitted,



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