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September 8, 2008

VIA E-MAIL & HAND DELIVERY

Hon. Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: Case 08-E-0539 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service
Direct Testimony and Exhibits of Liam T. Baker on behalf of Astoria Generating Company, L.P., a US Power Generating Company

Dear Secretary Brillling:

In accordance with Section 4.5 of the Commission's Rules and Regulations, the Ruling on Schedule issued by Administrative Law Judges Howard A. Jack and Gerald L. Lynch on June 24, 2008, the e-mail notice issued by Administrative Law Judges Howard A. Jack and Gerald L. Lynch on September 4, 2008 and the e-mail notice issued by your office on the same afternoon, enclosed are an original and one additional hard copy of the Direct Testimony and Exhibits of Liam T. Baker which are being submitted in the above-referenced proceeding on behalf of Astoria Generating Company, L.P., a US Power Generating Company ("AGC Testimony"). A copy of this Direct Testimony has been served on all parties on the Service List via electronic mail and to selected parties on the Service List per the ALJs' express instructions via U.S. Mail. In addition, as a courtesy, we also have served a hard copy of Mr. Baker's Direct Testimony on counsel to Consolidated Edison Company of New York, Inc. via overnight mail.

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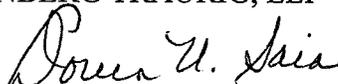
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Ms. Jaclyn A. Brillling
September 8, 2008
Page 2

Please date-stamp the copy of this letter as evidence of its receipt and return it to our messenger. If you have any questions, please call or e-mail me.

Very truly yours,

GREENBERG TRAUIG, LLP


Doreen U. Saia

DUS/aaw

Enclosures

cc: All Active Parties (via e-mail)
Selected Active Parties (per ALJ's September 4, 2008 notice, via U.S. Mail; w/enc.)
Hon. Howard A. Jack (via e-mail and hand delivery; w/enc.)
Hon. Gerald L. Lynch (via e-mail and hand delivery; w/enc.)
Mary Krayske, Esq. (via overnight mail)
Marc Richter, Esq. (via overnight mail)

ALB 1,181,045v1 9-8-08

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Proceeding on Motion of the Commission as
to the Rates, Charges, Rules and Regulations
of Consolidated Edison Company of New
York, Inc. for Electric Service.

CASE 08-E-0539

DIRECT TESTIMONY

AND

EXHIBITS

OF

LIAM T. BAKER

Dated: September 8, 2008
Albany, New York

Liam T. Baker
Vice President of Regulatory Affairs for
US Power Generating Company
on behalf of
ASTORIA GENERATING COMPANY, LP,
a U.S. POWER GENERATING COMPANY

1 Q Please state your name and business address.

2 A My name is Liam T. Baker. My business address is US Power Generating
3 Company, 505 Fifth Avenue, 21st Floor, New York, New York 10017.

4 Q Please state your current position.

5 A I am Vice President of Regulatory Affairs for US Power Generating Company
6 (“USPG”). Astoria Generating Company, L.P. (“Astoria Generating”) is one of
7 the operating companies owned by USPG.

8 Q Please describe your background?

9 A I have a Bachelor of Science Degree in Mechanical Engineering from Manhattan
10 College, a Bachelor of Arts Degree in Liberal Arts from Fairfield University, and
11 a Juris Doctorate from Pace University School of Law.

12 Q On whose behalf are you submitting testimony in this proceeding?

13 A I am providing this testimony on behalf of Astoria Generating. Astoria
14 Generating owns and operates approximately 2200 MW of generation, all of
15 which is located in New York City, NYISO Zone J. These facilities were one of
16 the three Consolidated Edison Company of New York, Inc.’s (“Con Edison” or
17 the “Company”) divested generation bundles and are comprised of Astoria steam
18 generating units 2, 3, 4 and 5 and the Narrows and Gowanus gas turbines.

19 Q Are you familiar with Astoria Generating’s participation in Con Edison’s previous
20 electric rate case before the New York State Public Service Commission
21 (“Commission” or “PSC”), Case 07-E-0523 Proceeding on Motion of the
22 Commission as to the Rates, Charges, Rules and Regulations of Consolidated

1 Edison Company of New York, Inc. for Electric Service (“Con Ed Rate Case I
2 Proceeding”)?

3 A Yes. I was involved in all aspects of Astoria Generating’s participation in the
4 Con Ed Rate Case I Proceeding, including its submissions of information
5 requests, sponsorship of the testimony of Mr. Timothy Bush, and the development
6 of its briefs.

7 Q Have you previously submitted testimony in other proceedings before the New
8 York Public Service Commission?

9 A No, I have not.

10 Q Have you previously submitted testimony in other regulatory proceedings?

11 A No. I have not previously submitted testimony in other regulatory proceedings. I
12 did, however, submit a supporting affidavit on July 31, 2008 in response to a
13 request for comments issued by the Board of Directors of the New York
14 Independent System Operator, Inc. (“NYISO”) with respect to the Installed
15 Capacity Demand Curves for the NYISO New York City capacity zone.

16 Q What is the purpose of your testimony in this proceeding?

17 A The purpose of my testimony is to discuss Con Edison’s plans and ability to
18 continue to ensure the safe and reliable operation of its systems upon the
19 mandated retirement of the New York Power Authority’s (“NYPA”) 885 MW
20 Charles A. Poletti facility (“Poletti 1 Facility”) which has been ordered to take
21 place by February 1, 2010.

22 Q Have you attached any exhibits to your testimony?

1 A Yes, I have. My resume is attached as Exhibit ____ (LB-1). In addition, I have
2 appended Con Edison's responses to Astoria Generating Information Requests
3 upon which I will rely in my testimony as Exhibit ____ (LB-2). These responses
4 are to the following Astoria Generating Information Requests: AGC-15, AGC-
5 16, AGC-17, AGC-18, AGC-19, AGC-20, AGC-21, AGC-23, AGC-26, AGC-28,
6 AGC-29 and AGC-30.)

7 Q What plans, if any, did Con Edison propose in the Con Ed Rate Case I Proceeding
8 to ensure that its systems would continue to be operated safely and reliably upon
9 the mandated retirement of the Poletti Facility I by February 1, 2010.

10 A In the Direct Testimony of its Infrastructure Investment Panel in that proceeding,
11 Con Edison proposed the East 13th Street Load Pocket project to replace the
12 support for the East 13th Street load pocket which will be lost upon the retirement
13 of the Poletti I Facility. Con Edison identified that one potential project to meet
14 this need was to reconfigure existing feeders Q35L and M, which connect the
15 Poletti I Facility to the East 13th Street substation. (See Con Ed Rate Case I
16 Proceeding, Direct Testimony of Infrastructure Investment Panel, pp. 37-38.)

17 Q Did Con Edison offer any other alternatives in the Con Ed Rate Case I Proceeding
18 to address the East 13th Street load pocket?

19 A Yes, it did. In response to concerns that were raised in the Direct Testimony of
20 Mr. Timothy Bush submitted on behalf of Astoria Generating, Con Edison's
21 Infrastructure Investment Panel testified in its Rebuttal Testimony that Con
22 Edison had conducted load modeling studies and determined that it could target
23 certain levels of demand response management ("DSM") to address its system

1 needs in this area. (See Con Ed Rate Case I Proceeding, Rebuttal Testimony of
2 Infrastructure Panel, pp. 89-90.) Con Edison's Infrastructure Investment Panel
3 further testified that, should Con Edison be unable to achieve these DSM levels, it
4 would be able to rely on certain operating protocols to maintain the safe and
5 reliable operation of its systems upon the mandated retirement of the Poletti I
6 Facility. (Id.)

7 Q Did Con Edison provide any further information concerning the East 13th Street
8 load pocket issue in the Con Ed Rate Case I Proceeding?

9 A Yes, it did. On cross-examination, Con Edison's witness, Mr. William Longhi, a
10 member of the Infrastructure Investment Panel, reaffirmed that Con Edison firmly
11 believed that it would be able to continue to safely and reliably operate its systems
12 upon the mandated retirement of the Poletti I Facility by implementing its
13 transmission alternative, securing targeted DSM or relying upon operating
14 protocols. (See Con Ed Rate Case I Proceeding, Tr. at 2094-95.)

15 Q Was Con Edison's proposal to meet the East 13th Street load pocket needs
16 addressed by the Administrative Law Judges in the Con Ed Rate Case I
17 Proceeding?

18 A Yes, it was. In their Recommended Decision, the Administrative Law Judges
19 found that "[t]he Company witnesses testified that there are various means of
20 ensuring reliability within the load pocket upon the retirement of the Poletti
21 station [and found] that the Company will be capable of balancing this need
22 against its other priorities." (Con Ed Rate Case I Proceeding, Recommended
23 Decision issued January 8, 2008, p. 90.)

1 Q Did Con Edison identify any other issues in the Con Ed Rate Case I Proceeding
2 with respect to safely and reliably operating its systems upon the mandated
3 retirement of the Poletti I Facility?

4 A No, it did not.

5 Q Has Con Edison provided information in this proceeding regarding its plan to
6 address the East 13th Street load pocket upon the mandated retirement of the
7 Poletti I Facility?

8 A Yes. Its Infrastructure Investment Panel in this proceeding includes some of the
9 same witnesses as its Infrastructure Investment Panel in the Con Ed Rate Case I
10 Proceeding, including Mr. Longhi. Con Edison did not reintroduce its
11 transmission proposal for the East 13th Street load pocket as part of its
12 Infrastructure Investment Plan or otherwise address how it would address this
13 issue in its Direct Testimony. However, in its responses to Information Requests
14 from Astoria Generating, which are appended hereto in Exhibit ____ (LB-2), Con
15 Edison's Infrastructure Investment Panel provided information on its plan to
16 address the East 13th Street load pocket issue. Con Edison's responses to
17 Information Requests AGC-15, AGC-16, AGC-19, AGC-21, AGC-26, AGC-28,
18 AGC-29 and AGC-30 address this issue. In these responses, Con Edison stated
19 that it has deferred work on its transmission alternative and has had no further
20 discussion with NYPA regarding the purchase or use of feeders Q35L and Q35M
21 because it has entered into a contract to provide targeted DSM to the load areas
22 associated with the East 13th Street and East River transmission stations.

1 Q Did Con Edison confirm that it would be able to rely on operating protocols to
2 meet these needs if its DSM efforts did not achieve the needed load reductions?

3 A Yes, it did. In these responses, Con Edison reaffirmed that if the targeted DSM
4 efforts are not successful notwithstanding its DSM contract, Con Edison can and
5 will rely upon operating protocols to reliably operate its systems, including the
6 East 13th Street load pocket, upon the mandated retirement of the Poletti I Facility.

7 Q Did Con Edison identify any other system needs in this proceeding that must be
8 addressed upon the mandated retirement of the Poletti I Facility?

9 A Yes, it did. In the Direct Testimony of its Infrastructure Investment Panel, Con
10 Edison stated that it plans to install a phase angle regulator (“PAR”) on feeder
11 38M72 between the Vernon 138 kV Switching Station and the West 49th Street
12 Switching Station to address controllability upon the Poletti I Facility retirement.
13 (See Direct Testimony of Infrastructure Investment Panel, pp. 71-72.)

14 Q Is this project tied to the East 13th Street Project?

15 A Astoria Generating submitted Information Requests AGC-16, AGC-17, AGC-18,
16 AGC-19, AGC-20 and AGC-30 to obtain further information concerning the
17 Vernon PAR project and its relationship to the East 13th Street load pocket issue
18 that Con Edison had identified in the Con Ed Rate Case I Proceeding. The
19 responses to these Information Requests are attached hereto as part of Exhibit ____
20 (LB-2). In its responses, Con Edison stated that these two issues both must be
21 addressed in light of the Poletti I Facility retirement but they are otherwise not
22 interrelated, i.e., one is not a substitute for the other.

23 Q When will the Vernon PAR project be completed?

1 A In its response to Information Request AGC-18, Con Edison stated that this work
2 is currently scheduled to be completed and ready for service by the summer,
3 2010.

4 Q As was the case for the East 13th Street load pocket project, can Con Edison rely
5 on DSM initiatives or operating protocols if the installation of the Vernon PAR is
6 delayed beyond the summer, 2010?

7 A Yes, in its response to Information Request AGC-19, Con Edison has confirmed
8 that it can and will rely on operating measures and DSM to ensure the continued
9 reliability of the transmission system until further upgrades are made or until new
10 transmission or generation interconnections are established.

11 Q Has Con Edison identified any other projects that must be completed or system
12 needs that must be met upon the mandated retirement of the Poletti I Facility by
13 February 1, 2010 to ensure the continued safe and reliable operation of its
14 systems?

15 A No. In its response to Information Request AGC-23, Con Edison expressly stated
16 that it has not identified any other projects, initiatives or operating protocols that
17 will be needed for it to continue to safely and reliably operate its systems upon the
18 mandated Poletti I Facility retirement.

19 Q Does Astoria Generating have a position on Con Edison's plan to ensure that it
20 will safely and reliably operate its systems upon the mandated retirement of the
21 Poletti I Facility by February 1, 2010?

22 A As noted above, Astoria Generating's core concern was that Con Edison must be
23 able to safely and reliably operate its systems upon the mandated retirement of the

1 Poletti I Facility by February 1, 2010. In the Con Ed Rate Case I Proceeding and
2 in this proceeding, Con Edison has provided proposals and has expressly
3 confirmed that these proposals will ensure that it will be able to do so. In its
4 response to Information Request AGC-30, Con Edison also has expressly
5 confirmed that its use of operating protocols will not impact the dispatch and/or
6 operations of any generating units. It is Con Edison's core obligation and
7 responsibility to ensure the reliability of its systems. Con Edison should be
8 directed to effectuate its proposals in a timely manner to ensure the continued safe
9 and reliable operation of its systems upon the Poletti I Facility's retirement by
10 February 1, 2010.

11 Q Does this conclude your testimony at this time?

12 A Yes, it does.

EXHIBIT ___(LB-1)

EXPERIENCE

US Power Generating Company LLC, April 2006- present
Vice President

- Responsible for a variety of regulatory matters affecting all assets
- Manage various legal and tax matters affecting NYC assets
- All traditional Asset Management functions previously provided for Reliant Energy and Orion Power

Greenberg Traurig LLP, April 2005 – April 2006
Associate

- Represented wholesale and retail energy suppliers in a variety of commercial, regulatory and contractual matters.

Reliant Energy, February 2002 – March 2005
Orion Power New York, December 1999 – February 2002
Asset Manager

- Manage, develop, negotiate and implement company policy positions at the NYISO and assist in various FERC matters
- Overall responsibility for resolving issues and negotiating business matters with local transmission owner and competitors
- Responsible for various legal and tax matters of New York City assets
- Developing and maintaining public and community relations for Orion Power in New York City

Consolidated Edison Company of New York, Inc.
Attorney, Law Department – Real Estate, Sept. – December 1999

- Drafted and reviewed an array of real estate agreements, including easements, licenses, condemnations, etc.

Engineer, Energy Management – Divestiture Team, May 1998 – Sept. 1999

- Demarcated electrical and mechanical systems necessitated by the sale of six power plants and coordinated property subdivision efforts (both legal and technical) necessitated by the sale of power plants

Operating Supervisor, Staten Island Overhead Construction
June 1996 – May 1998

Field Engineering Intern, various New York City locations
July 1993 – June 1996

EDUCATION

Pace University School of Law; White Plains, N.Y.
Juris Doctorate, May 1999; Admitted in N.Y. and CT
Manhattan College; Riverdale, N.Y.
Bachelor of Science, Mechanical Engineering, May 1993
Fairfield University; Fairfield, CT
Bachelor of Arts, Liberal Arts (Minor, Philosophy), May 1993

INTERESTS

Volunteer Firefighter, Long Hill Fire Department, Trumbull, CT

EXHIBIT ____ (LB-2)

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1
Date of Response: 07/21/2008
Responding Witness: IIP

Question No. :15

In the Con Ed I Rate Case, the Infrastructure Investment Panel in that case which was comprised of some of the same witnesses as the Infrastructure Investment Panel in the instant case proposed the East 13th Street Load Pocket Project (“East 13th Street Project”) to replace the support for the East 13th Street load pocket that will be lost upon the January 31, 2010 mandated retirement of Poletti I. At that time, the Company identified reconfiguring the existing feeders Q35L and Q35M, which are owned by the New York Power Authority. Please explain why the East 13th Street Project has not been included as part of the Infrastructure Investment Plan in this rate case.

Response:

The earlier plan, identifying a reconfiguring option for feeders Q35L and Q35M to provide power to East 13th Street from another generator or station, has been deferred because the Company entered into a contract to provide targeted Demand Side Management (DSM) to the load areas associated with the East 13th Street and East River transmission stations.

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1
Date of Response: 07/21/2008
Responding Witness: IIP

Question No. :16

At pages 71-72 of the Infrastructure Investment Panel Direct Testimony, the Company has identified the Vernon - West 49th Street 38M72 Upgrade (“Vernon Project”) as a project that is needed to provide controllability upon the Poletti I retirement. Please explain whether the Company is proposing to substitute the Vernon Project for the East 13th Street Project as the transmission project that will ultimately be needed to replace the support for the East 13th Street load pocket upon the Poletti I retirement.

Response:

The Company is not substituting the Vernon Project for the East 13th Street Project as the transmission project that will ultimately be needed to replace the support for the East 13th Street load area upon the Poletti I retirement. While both the Vernon Project and the E13th Street Project were identified as a result of the retirement of Poletti I, they are not related by function. The Vernon Project supports the W49th Street load area (which includes East 13th Street and East River Stations) in the event of the contingency loss of Feeders M51 and M52. The East 13th Street Project (deferred by DSM) supports the East 13th Street load area (which includes East River station) in the event of the contingency loss of Feeders B47 and B48.

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1
Date of Response: 07/21/2008
Responding Witness: IIP

Question No. :17

If the response to Information Request AGC-16 is affirmative, please confirm that the Vernon Project will provide the support that is needed to reliably serve the East 13th Street load pocket upon the Poletti I retirement.

Response:

The Vernon Project is not a substitute for the East 13th Street Project.

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1
Date of Response: 07/21/2008
Responding Witness: IIP

Question No. :18

Please specify the date in 2010 on which the Vernon Project will be completed.

Response:

The phase angle regulator (PAR) installation at the Vernon Substation is currently scheduled to be completed and ready for service by the summer of 2010.

Company Name: Con Edison

Case Description:

Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1

Date of Response: 07/21/2008

Responding Witness: IIP

Question No. :19

During cross-examination in the Con Ed I Rate Case, Con Edison's Infrastructure Investment Panel confirmed that Con Edison would be able to continue to reliably serve its system, including the East 13th Street load pocket, upon the retirement of Poletti I by relying upon its demand side management ("DSM") program as well as operating protocols until such time as necessary transmission upgrades were completed. (See Con Ed I Rate Case, Tr. at 2095.) If completion of the Vernon Project is delayed, please confirm that Con Edison will rely on DSM and operating protocols to ensure the continued reliability of its system upon the Poletti I retirement until such time that the transmission upgrades are completed.

Response:

As discussed in the Company's response to AGC-16, the Vernon Project is being initiated for the West 49th Street load area, and has no impact on the East 13th Street load area. If the Vernon Project is delayed, Con Edison will rely on operating measures and DSM to ensure the continued reliability of the transmission system, until further upgrades are made, or until new transmission or generation interconnections are established.

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1
Date of Response: 07/21/2008
Responding Witness: IIP

Question No. :20

Please identify what operating protocols will be utilized if the Vernon Project is delayed.

Response:

The Company could implement certain operating protocols if the Vernon Project is delayed. These protocols are confidential.

Company Name: Con Edison

Case Description:

Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1

Date of Response: 07/21/2008

Responding Witness: IIP

Question No. :21

If the response to Information Request AGC-16 is negative, please explain the measures that Con Edison will implement to ensure the continued reliable operation of its system going forward, including the East 13th Street load pocket, upon the mandated January 31, 2010 Poletti I retirement.

Response:

With respect to the East 13th Street load area, the Company will implement DSM in the load areas served by East 13th Street and East River transmission stations.

Company Name: Con Edison

Case Description:

Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC1

Date of Response: 07/21/2008

Responding Witness: IIP

Question No. :23

Please identify any other projects, initiatives or operating protocols not heretofore presented in this rate case or the Con Ed I Rate Case which will be necessary to permit the reliable operation of the New York City transmission or distribution systems following the retirement of Poletti I on January 31, 2010.

Response:

Upon the retirement of Poletti I, Con Edison has not identified any other projects, initiatives, or operating protocols necessary to permit the reliable operation of the New York City transmission or distribution systems.

Company Name: Con Edison

Case Description:

Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC2

Date of Response: 08/18/2008

Responding Witness: IIP

Question No. :26

In its last electric rate case, NYPSC Case 07-E-0523 (“Con Ed I Rate Case”), the Company’s Infrastructure Investment Panel established in response to an AGC Information Request that it had conducted some preliminary exploratory discussions with the New York Power Authority (“NYPA”) concerning the purchase of feeders Q35L and Q35M. Please provide any and all details concerning the status of Con Edison’s efforts to purchase these two feeders from NYPA.

Response:

We have had no further discussions with NYPA regarding the purchase of feeders Q35L and Q35M.

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC2
Date of Response: 08/19/2008
Responding Witness: IIP

Question No. :28

In its Rebuttal Testimony and on cross-examination in the Con Ed I Rate Case, the Company's Infrastructure Investment Panel confirmed that Con Edison could implement operating protocols to reliably operate its system upon the mandated retirement of NYPA's Poletti I generating facility ("Poletti I"), including the East 13th Street load pocket, if its DSM efforts were not successful. In its response to Information Request AGC-15 in this proceeding, Con Edison's Infrastructure Investment Panel has stated that it has deferred its transmission project to address the East 13th Street load pocket because it has entered into a contract for targeted DSM. If the targeted DSM efforts are not successful notwithstanding this contract, please confirm that Con Edison can and will rely upon operating protocols to reliably operate its system, including the East 13th Street load pocket, upon the mandated retirement of Poletti I.

Response:

Yes.

Company Name: Con Edison

Case Description:

Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC2

Date of Response: 08/18/2008

Responding Witness: IIP

Question No. :29

In its Update, the Company states that it is “concerned that delaying final discussion about energy efficiency through 2015 (the date for achievement of the State’s 15x15 goal) increases the risk that the Company will need to begin spending for long lead time items for T&D projects that are currently deferred.” (See Transmittal Note at 4-5.)

Please indicate whether the East 13th Street targeted DSM efforts identified in response to Information Request AGC-15 in this proceeding will be affected by the Company’s evaluation of the Commission’s June 23, 2008 Order in the EEPS Proceeding (NYPS Case 07-M-0548), and if so, how such targeted DSM efforts will be affected.

Response:

The timing associated with the EEPS proceeding and subsequent order issued on June 23, 2008 has no impact on the Company’s Targeted DSM contracted initiative for the East 13th Street load area.

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to Astoria Gen. Co. Interrogatories – Set AGC2
Date of Response: 09/05/2008
Responding Witness:

Question No. :30

In response to Information Request AGC-20 in this proceeding, the Company states that the operating protocols that it will use if the Vernon project is delayed are confidential. Please specify whether the Company expects these operating protocols or any of the operating protocols that may be needed to address the East 13th Street load pocket to impact the dispatch of or operations of any generating units. If the answer is yes, please identify each of the units that are expected to be affected and the extent of such effect.

Response:

The Company does not expect that a delay in either of these projects would require a change in operating protocols that would impact the dispatch and/or operations of any generating units.