

May 3, 2024

Samantha Meserve
Department of Energy Resources
100 Cambridge Street
9th Floor
Boston, MA 02114

Re: CPS Review Comments

To Whom It May Concern:

The Massachusetts Department of Energy Resources (“DOER”) is currently conducting a review of the Clean Peak Energy Standard Program (CPS). As part of that review, DOER requested feedback on a series of questions in a document titled “2024 Clean Peak Energy Standard Review Stakeholder Questions.” Constellation NewEnergy, Inc. (“CNE”) hereby respectfully submits these comments to DOER for their consideration. CNE appreciates DOER Staff’s efforts on this topic and looks forward to continued discussions.

As DOER considers changes to the CPS such as altering Clean Peak Energy Certificate (CPEC) multipliers, minimum standards, and the alternative compliance payment (ACP) rates, CNE requests that there be an exemption for existing contracts. Providing an exemption for existing contracts will avoid unexpected and potentially significant price increases and the associated financial strain on customers who have entered into agreements under existing obligations and have limited budgets under those conditions.

Thank you for your consideration and please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,



David Creer
Manager, State Government Affairs