

# KEEGAN WERLIN LLP

ATTORNEYS AT LAW

99 HIGH STREET, Suite 2900

BOSTON, MASSACHUSETTS 02110

---

(617) 951-1400

TELECOPIER:

(617) 951-1354

November 1, 2022

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110

Re: Section 83C Long-term Contracts for Offshore Wind Energy Generation – D.P.U. 22-70/71/72

Dear Secretary Marini:

NSTAR Electric Company d/b/a/ Eversource Energy (“Eversource”), Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid (“National Grid”), and Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”) (collectively, the “Companies”) submit this letter in reply to the Initial Briefs of the Office of the Attorney General (the “AGO”), the Department of Energy Resources (the “DOER”) in these proceedings. The Companies agree with both the AGO and the DOER that the Department should approve the power purchase agreements the Companies have executed with Commonwealth Wind LLC (“Commonwealth Wind”) and Mayflower Wind LLC (“Mayflower Wind”) to acquire respective, *pro rata* shares of the energy and associated Environmental Attributes from the developers’ aggregate 1,605 MW of Offshore Wind Energy Generation (“PPAs”), and rest on the Companies’ Initial Brief regarding support for the same.

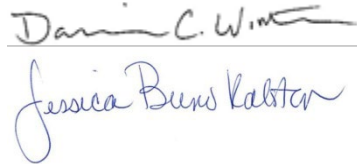
With this letter, the Companies also acknowledge the respective Motions submitted by Commonwealth Wind and Mayflower Wind seeking to pause the Department’s deliberations in these dockets by one month, in an effort to pursue renegotiation of key terms of the PPAs. Such a pause is unnecessary, however, given that the Companies do not intend to renegotiate the PPAs. The projects subject to the PPAs were selected by the Companies, in consultation with the DOER, pursuant to a robust competitive solicitation and thorough evaluation. Moreover, the Companies negotiated the PPAs in good faith and have supported approval of the PPAs with unchallenged substantial evidence in these proceedings. Accordingly, the Companies request that the Department approve the PPAs expeditiously.

Thank you for your attention to this matter. Please contact us with any questions.

Respectfully submitted,

**NSTAR ELECTRIC COMPANY d/b/a  
EVERSOURCE ENERGY**

By its attorneys,

Handwritten signatures of Danielle C. Winter and Jessica Buno Ralston. The signature of Danielle C. Winter is in blue ink and is enclosed in a rectangular box. The signature of Jessica Buno Ralston is in blue ink and is written below the first signature.

---

Danielle C. Winter, Esq.  
Jessica Buno Ralston, Esq.  
Keegan Werlin LLP  
99 High Street, Ste 2900  
Boston, Massachusetts 02110  
(617) 951-1400

**MASSACHUSETTS ELECTRIC COMPANY  
and NANTUCKET ELECTRIC COMPANY  
d/b/a NATIONAL GRID**

By its attorneys,

Handwritten signatures of John K. Habib and Ashley S. Marton. The signature of John K. Habib is in blue ink and is written above the signature of Ashley S. Marton.

---

John K. Habib, Esq.  
Ashley S. Marton, Esq.  
Michael B. Hershberg, Esq.  
Keegan Werlin LLP  
99 High Street, Suite 2900  
Boston, Massachusetts 02110  
(617) 951-1400

**FITCHBURG GAS AND ELECTRIC LIGHT  
COMPANY D/B/A UNITIL**

By its attorney,



---

William D. Hewitt  
Hewitt & Hewitt  
500 US Route 1, Suite 107  
Yarmouth, ME 04096  
(207) 838-3789  
whewitt@HewittLegalAdvisors.com

Enclosures

cc: Mary Alice Davey, Esq. – Hearing Officer  
Kevin Crane, Esq. – Hearing Officer  
D.P.U. 22-70/71/72 Service List