

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

---

Petition of NSTAR Electric Company d/b/a )  
Eversource Energy for Approval of Proposed Long-) )  
Term Contracts for Offshore Wind Energy ) D.P.U. 22-70  
Generation Pursuant to Section 83C of an Act )  
Relative to Green Communities, St. 2008, c. 169, as )  
amended by St. 2016, c. 188, §12; St. 2021, c. 8 §§ )  
91 *et. seq.* )  
)

---

Petition of Massachusetts Electric Company and )  
Nantucket Electric Company d/b/a National Grid )  
for Approval of Proposed Long-Term Contracts for ) D.P.U. 22-71  
Offshore Wind Energy Generation Pursuant to )  
Section 83C of an Act Relative to Green )  
Communities, St. 2008, c. 169, as amended by St. )  
2016, c. 188, §12; St. 2021, c. 8 §§ 91 *et. seq.* )  
)

---

Petition of Fitchburg Gas and Electric Light )  
Company d/b/a Unitil for Approval of Proposed )  
Long-Term Contracts for Offshore Wind Energy ) D.P.U. 22-72  
Generation Pursuant to Section 83C of an Act )  
Relative to Green Communities, St. 2008, c. 169, as )  
amended by St. 2016, c. 188, §12; St. 2021, c. 8 §§ )  
91 *et. seq.* )  
)

**NOTICE OF COMMONWEALTH WIND, LLC PURSUANT TO  
THE DEPARTMENT’S NOVEMBER 4 INTERLOCUTORY ORDER**

In accordance with the November 4, 2022 Interlocutory Order issued by the Department of Public Utilities (the “Department”), Commonwealth Wind, LLC (“Commonwealth Wind”) hereby provides notice that, absent the relief that Commonwealth Wind has previously requested, the Department should not dismiss the proceedings as to the power purchase agreements

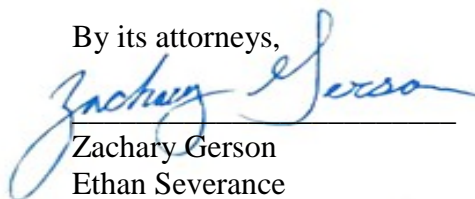
(“PPAs”) between Commonwealth Wind and the Massachusetts Electric Distribution Companies (“EDCs”).

For the reasons stated in Commonwealth Wind’s prior submissions,<sup>1</sup> Commonwealth Wind strongly believes that it is in the public interest to allow the parties to negotiate PPA contract amendments that allow Commonwealth Wind’s offshore wind generation project (the “Project”) to be economically viable, to obtain financing and to proceed to construction and, finally, to deliver Massachusetts customers cost-effective renewable energy at prices that would be lower than alternatives.<sup>2</sup> If the Department does not support a pause in these proceedings, as previously requested by Commonwealth Wind, then the appropriate action is for the Department to continue with this proceeding such that the parties can continue ongoing discussions to employ all opportunities, including contract improvements, to achieve a financeable and economically viable Project.

Respectfully submitted,

**COMMONWEALTH WIND, LLC**

By its attorneys,



Zachary Gerson  
Ethan Severance  
FOLEY HOAG LLP  
155 Seaport Boulevard  
Boston, Mass. 02210-2600  
617-832-1000  
zgeron@foleyhoag.com  
eseverance@foleyhoag.com

Dated: November 14, 2022

---

<sup>1</sup> “Prior Submissions” refers to Commonwealth Wind’s Motion for a One-Month suspension (Oct. 20, 2022), Commonwealth Wind’s Reply Brief (Nov. 1, 2022), and Commonwealth Wind’s Limited Motion to Reopen the Evidentiary Record (Nov. 1, 2022).

<sup>2</sup> It is in the public interest to pursue contracts with eligible resources that offer lower-costs. *See, e.g., NSTAR Electric Co./Massachusetts Elec. Co./Fitchburg Gas & Elec. Light Co.*, D.P.U. 20-16/20-17/20-18, at 56 (Nov. 5, 2020).