

KEEGAN WERLIN LLP

ATTORNEYS AT LAW

99 HIGH STREET, Suite 2900

BOSTON, MASSACHUSETTS 02110

(617) 951-1400

TELECOPIER:

(617) 951- 1354

December 23, 2022

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th 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 Motion to Dismiss filed by Commonwealth Wind LLC (“Commonwealth Wind”) in the above-referenced proceedings.

The Department should deny Commonwealth Wind’s Motion to Dismiss. Commonwealth Wind negotiated and executed comprehensive Purchase Power Agreements with the Companies that are now before the Department for approval following a full and fair adjudicatory process. Approving the Motion to Dismiss at this very late stage would significantly undermine what to date has been a very successful process established in Massachusetts to encourage the development of offshore wind projects.

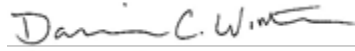
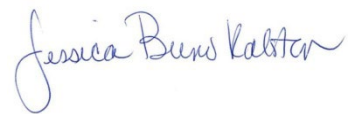
Accordingly, based on substantial record evidence, the Department should approve the power purchase agreements the Companies have executed with Commonwealth Wind *and* Mayflower Wind LLC to acquire respective, *pro rata* shares of the energy and associated Environmental Attributes from the developers’ aggregate 1,605 MW of Offshore Wind Energy Generation.

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,

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,




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