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Department of Public Service
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December 13, 2011

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street – Drawer 40
Montpelier, VT 05620-2701

Re: Docket 7081 – Comments of DPS on changes to MOU

Dear Mrs. Hudson,

On November 22, 2011, Vermont Electric Power Company, Inc. and Vermont Transco LLC (together, “VELCO”) filed a Petition with the Public Service Board (“Board”) requesting approval for ten changes to the Memorandum of Understanding (“MOU”) that the Board approved in June of 2007 in Docket 7081. The Board requested comments by December 13, 2011. This letter contains the comments of the Department of Public Service (“Department”).

The Department is generally supportive of the changes but asks for two specific conditions in any Board order approving the changes to the MOU as follows:

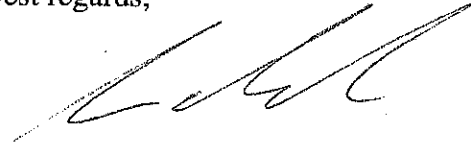
- 1) The Board in approving the MOU, should include in its order a condition that the Parties through the VSPC process outlined in Paragraph 21 of the MOU, further define the terms “impracticable” and “uneconomic” in the context of revising the NTA screening tool.
- 2) The Board in approving the MOU, should require that the NTA screening tool be updated and filed with the Board, as per the process set forth in paragraph 21 of the MOU, within six months of the date of an order approving the MOU modifications. If the VSPC despite good faith efforts has not completed the revisions to the NTA screening tool, the Parties must file a status report on the actions and efforts to date on completing revisions to the NTA screening tool and estimate when the revisions will be completed and filed.

Finally, the Board has asked that any requests for hearing on VELCO’s November, 22, 2011 filing also be filed by December 13, 2011. The Department does not believe a hearing is necessary and recommends that the proposed changes be approved without investigation or hearing but with the two conditions recommended above by the Department.



Thank you for the opportunity to comment on this filing.

Best regards,

A handwritten signature in black ink, appearing to read 'A. Kisicki', written in a cursive style.

Aaron Kisicki
Special Counsel

cc: Docket 7081 Service List
Deena Frankel

PSB Docket No. 7081- SERVICE LIST

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