

**State of Vermont**  
**Department of Public Service**  
112 State Street  
Drawer 20  
Montpelier, VT 05620-2601  
TEL: 802-828-2811

FAX: 802-828-2342  
TTY VT: 800-734-8390  
email: vtdps@state.vt.us  
<http://publicservice.vermont.gov/>

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:

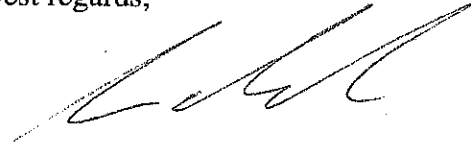
- 1) The Board in approving the MOU, should include in its order a condition that the Parties through the VSPC process outlined in Paragraph 21 of the MOU, further define the terms “impracticable” and “uneconomic” in the context of revising the NTA screening tool.
- 2) The Board in approving the MOU, 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

**Parties:**

Aaron Kisicki, Special Counsel  
Vermont Department of Public Service  
Chittenden Bank Building  
112 State Street - Drawer 20  
Montpelier VT 05620-2601

Morris L. Silver, Esq.  
The Kellogg Farm  
Stage Road - PO Box 606  
Benson, VT 05731-0606 (CVPSC)

Helen, M. Fitzpatrick, Esq.  
Central Vermont Public Service Corporation  
77 Grove Street  
Rutland, VT 05701 (CVPSC)

Edward V. Schwiebert, Esq.  
Reiber, Kenlan, Schwiebert & Facey, P.C.  
71 Allen Street - Suite 401  
PO Box 578  
Rutland, VT 05702-0578 (VT Marble)

William F. Ellis, Esq.  
McNeil, Leddy & Sheahan  
271 Union Street  
Burlington, VT 05401 (BED)

City of Burlington Electric Department  
Patty Richards - Ken Nolan  
585 Pine Street  
Burlington, VT 05401 (BED)

Victoria J. Brown, Esq.  
Primmer Piper Eggleston & Cramer PC  
150 South Champlain Street - PO Box 1489  
Burlington, VT 05402-1489 (VEC)

David J. Mullett, Esq.  
Attorney At Law  
138 Main Street - Suite 2 - PO Box 127  
Montpelier, VT 05601-0127 (14  
Municipals)

Peter H. Zamore, Esq.  
Benjamin Marks, Esq.  
Sheehey, Furlong & Behm, P.C.  
30 Main Street - 6<sup>th</sup> Floor  
PO Box 66  
Burlington, VT 05402 (GMP)

Sandra Dragon  
Associates Industries of Vermont  
PO Box 630  
Montpelier, VT 05601 (AIV)

Sandra Levine, Esq.  
Conservation Law Foundation  
15 East State Street - Suite 4  
Montpelier, VT 05602 (CLF)

Bernard D. Lambek  
Zalinger, Cameron & Lambek, P.C.  
140 Main Street  
PO Box 1310  
Montpelier, VT 05601-1310 (ISO NE)

Mark Sciarrotta, Esq.  
VELCO  
366 Pinnacle Ridge Road  
Rutland, VT 05701 (VELCO)

Rochester Electric Light & Power Company  
Thomas Pierce, President  
PO Box 6 - Rochester, VT 05767

Washington Electric Cooperative, Inc.  
William Powell  
PO Box 8  
East Montpelier, VT 05651

Ellen L. Burt, Acting General Manager  
Village of Hyde Park Electric Department  
PO Box 400  
Hyde Park, VT 05655