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April 25, 2022

Via Electronic Mail Only

Daniel C. Goldner, Chair
Public Utilities Commission
21 S. Fruit Street
Concord, NH 03301-2429

Re: DE 22-003 New England Power Company, 2021 CTC Reconciliation Report
DOE response to Commission's Procedural Order (April 13, 2022).

Dear Chair Goldner:

The Department of Energy (DOE) is filing this letter to clarify the record in this docket, and to ask that the Commission accept the DOE's April 8 filing as the "complete analysis."

By way of background, the DOE April 8 analysis in the above referenced docket is the first analysis filed since the DOE was established in July 2021. On April 13, 2022, the Commission issued a procedural letter asserting that DOE's April 8 filing "summarized the analysis prepared by its analyst," and asserted that "[i]n past similar dockets, the complete analysis has been filed for the Commission's review in support of approval." The Commission therefore requested that DOE "file a complete copy of the analysis prepared by its analyst on or before May 1, 2022." The DOE wishes to clarify the underlying facts.

First, a "separate analysis" by Jay Dudley, the analyst copied on the DOE's April 8 filing, does not exist. The April 8 filing, which Mr. Dudley assisted in preparing, is the only written DOE report in existence with regard to the 2021 CTC Reconciliation Report. The April 8 filing meets the Commission's March 2, 2022 request that DOE "file its recommendation with the Commission...." See Procedural Order (March 2, 2022). There is no other analysis to file.

Second, the content of the prior PUC Staff Recommendation in the 2021 docket is virtually identical to the content of the DOE Analysis filed in the 2022 docket, adjusted to correspond to the 2020 and (in this docket) the 2021 CTS Reports respectively. Compare PUC Staff Recommendation (April 16, 2021) in Dkt. No. DE 21-011 with DOE Analysis (April 8, 2022) in Dkt. No. DE 22-003; see also PUC Staff Recommendation (April 16, 2021) in Dkt. No. DE 20-016 (Jay Dudley, Analyst). The most recent filing in the current docket differs from the prior two dockets in format only.

Accordingly, the DOE respectfully asks that the Commission accept the DOE's April 8, 2022 filing as the DOE's "complete analysis." DOE also renews its recommendation that this docket be

closed. Note that the 2021 CTC Report reviewed in this docket affirms amounts charged by New England Power Company to Liberty and provides a basis for stranded cost and transmission service charges to be included in Liberty's 2022 retail rates, which are expected to go into effect on or about May 1, 2022. See DOE Analysis (April 8, 2022) (in this docket); Docket No. DE 22-018, *Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, Annual Retail Rate Adjustments*.

Thank you for your consideration.

Sincerely,

/s/ Mary E. Schwarzer

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