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REDACTED MATERIALS ATTACHED

December 22, 2021

Andrew Greene, Director
Energy Facilities Siting Board
One South Station
Boston, MA 02110

Re: NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 21-04/D.P.U. 21-149

Dear Mr. Greene:

NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) and New England Power Company d/b/a National Grid (“National Grid”) (together, the “Companies”) are filing herewith their petition, pursuant to G.L. c. 164, § 69J (“Section 69J Petition”), seeking approval from the Energy Facilities Siting Board (the “Siting Board”) to construct, operate and maintain an approximately 12.1-mile 115-kilovolt (“kV”) primarily overhead electric transmission line along existing rights-of-way (“ROW”) between Eversource’s Industrial Park Tap in Acushnet, Massachusetts and National Grid’s Bell Rock Substation in Fall River, Massachusetts (the “New Line”).¹ In conjunction with the New Line, National Grid and Eversource will be performing limited work at three existing substations. National Grid will be installing protection and control upgrades, including a line trap and tuner, at the Bell Rock Substation in Fall River to complete the termination for the New Line, and Eversource will be implementing protection and control upgrades at its Tremont Substation in Wareham and its Acushnet Substation in Acushnet (the “Station Work”). The New Line, together with the Station Work, is referred to as the Acushnet to Fall River Reliability Project, or the “Project.”

Attachment A to the Section 69J Petition, entitled *Acushnet to Fall River Reliability Project – Analysis to Support the Petition Before the Energy Facilities Siting Board* (the “Analysis”), includes: (1) a detailed description of the Project; (2) an analysis of the need for the Project; (3) an analysis of the alternatives to the Project and its routing; and (4) an extensive review of the Project’s environmental impacts and proposed mitigation measures. In addition, the Analysis describes the Project’s consistency with the current health, environmental protection and resource use and development policies of the Commonwealth. In accordance with G.L. c. 164, §§ 69H, 69J

¹ Of the New Line, 7.9 miles will be in Acushnet, New Bedford and Dartmouth and will be owned and operated by Eversource; 4.2 miles will be in Fall River and will be owned and operated by National Grid.

and Siting Board precedent and standards, the Section 69J Petition demonstrates that the Project will ensure a reliable supply of energy for the Commonwealth with a minimum impact on the environment at the lowest possible cost.

In conjunction with the Section 69J Petition, the Companies are also filing with the Department of Public Utilities (the “Department”) on this date a petition pursuant to G.L. c. 164, § 72 (the “Section 72 Petition”) (D.P.U. 21-149). Consistent with precedent, the Companies are filing a motion with the Department requesting that the Section 72 Petition be referred to the Siting Board for consolidated review with the Section 69J Petition for the Project. Accordingly, enclosed is a Motion for Consolidation.

- **The Need for the Project**

The need for the Project was first identified in ISO-NE’s “Southeastern Massachusetts and Rhode Island Area 2026 Solutions Study” (“2026 Solutions Study”), issued in March 2017. The continuing need for the Project was confirmed in ISO-NE’s “Southeastern and Rhode Island Area 2029 Needs Assessment Update” (“2029 Needs Update”), issued in October 2020 and based on ISO-NE’s 2020 Capacity, Energy, Loads and Transmission (“CELT”) Report forecasts. The Project addresses the potential for thermal overloads and emerging voltage concerns on the Companies’ systems. These system reliability needs are immediate and require resolution by the Companies to maintain a reliable system in the Southeastern Massachusetts and Rhode Island (“SEMA-RI”) Area.

- **Additional Project Filing Documents**

The Companies note that certain information contained in three appendices to Attachment A to the Section 69J Petition qualifies as Critical Energy Infrastructure Information (“CEII”) and must be protected from public disclosure. Accordingly, this information has been redacted from the public filing in order to avoid disclosure of this confidential information. The Companies submit herewith a Motion for Protective Treatment of Critical Energy Infrastructure Information. Under separate cover, the Companies are submitting confidential (non-redacted) copies of these appendices containing CEII under seal to the Siting Board. The Companies are also providing the following herewith:

- Notices of Appearance of Counsel; and
- A consolidated Draft Notice of Public Hearing (hard copy and electronic version in MS Word format), premised on the expectation that the review of the Section 72 Petition will be referred to the Siting Board and consolidated with the Section 69J Petition for review.

In accordance with statutory requirements, the Companies have forwarded a copy of the Section 69J and Section 72 Petitions to the municipal clerks of Acushnet, New Bedford, Dartmouth, and Fall River.

Letter to A. Greene
December 22, 2021
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Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "David S. Rosenzweig". The signature is written in a cursive, flowing style.

David S. Rosenzweig

Enclosures

cc: Joan Foster Evans, General Counsel, Energy Facilities Siting Board
Jonathan Goldberg, Chief Legal Officer, Department of Public Utilities
Mark Marini, Secretary, Department of Public Utilities

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

Petition of NSTAR Electric Company d/b/a)	
Eversource Energy and New England Power)	
Company d/b/a National Grid for Approval to)	EFSB 21-04
Construct, Operate and Maintain a New 115-kV)	
Transmission Line in Acushnet, New Bedford,)	
Dartmouth and Fall River Pursuant to)	
G.L. c. 164, § 69J)	

**PETITION OF NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY AND
NEW ENGLAND POWER COMPANY d/b/a NATIONAL GRID PURSUANT TO
G.L. c. 164, § 69J**

I. INTRODUCTION

Now comes NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) and New England Power Company d/b/a National Grid (“National Grid”), seeking approval from the Energy Facilities Siting Board (the “Siting Board”) pursuant to G.L. c. 164, § 69J (“Section 69J”) to construct, operate and maintain an approximately 12.1-mile 115-kilovolt (“kV”) primarily overhead electric transmission line along existing rights-of-way (“ROW”) between Eversource’s Industrial Park Tap in Acushnet, Massachusetts and National Grid’s Bell Rock Substation in Fall River, Massachusetts (the “New Line”).¹ In conjunction with the New Line, National Grid and Eversource will be performing work at three existing substations. National Grid will be performing protection and control upgrades, including installation of a line trap and tuner, at the Bell Rock Substation in Fall River to complete the termination for the New Line and Eversource will be implementing protection and control upgrades at its Tremont Substation in Wareham and

¹ Of the New Line, 7.9 miles will be in Acushnet, New Bedford and Dartmouth and will be owned and operated by Eversource; 4.2 miles will be in Fall River and will be owned and operated by National Grid.

its Acushnet Substation in Acushnet (the “Station Work”). The New Line, together with the Station Work, is referred to as the Acushnet to Fall River Reliability Project, or the “Project.” The Project, as more fully described herein, is necessary to provide a reliable energy supply for the Commonwealth while minimizing cost and environmental impacts in accordance with Section 69J. In support thereof, the Companies state as follows:

1. Eversource is a Massachusetts corporation and an “electric company” as defined by G.L. c. 164, § 69G and is subject to the provisions of G.L. c. 164, §§ 69H-69R.

2. National Grid is a Massachusetts corporation and an “electric company” as defined by G.L. c. 164, § 69G and is subject to the provisions of G.L. c. 164, §§ 69H-69R.

3. Pursuant to G.L. c. 164, § 69J, an electric company seeking to construct a “facility” must first obtain approval from the Siting Board. Pursuant to G.L. c. 164, § 69G, jurisdictional facilities are defined to include a “a new electric transmission line having a design rating of 115 kilovolts or more which is 10 miles or more in length on an existing transmission corridor except reconductoring or rebuilding of transmission lines at the same voltage” and any “ancillary structure which is an integral part of the operation of any transmission line which is a facility.” The proposed New Line will be located along approximately 12.1 miles of existing ROW and have a design rating of 115 kV.

II. PROJECT DESCRIPTION

4. As described above, the New Line will be constructed within an existing ROW held by the Companies and currently used for transmission purposes. The existing transmission ROW varies from 150- to 210-feet wide. From the Industrial Park Tap west to the Industrial Park Substation (approximately 4.2 miles), there is one existing 115-kV transmission line located in the ROW on single circuit H-frame structures and collocated with an existing distribution line. This

section of ROW is approximately 210-foot wide. The existing 115-kV transmission line continues west from the Industrial Park Substation to the High Hill Switching Station in Dartmouth (approximately 2.4 miles), also on single circuit H-frame structures and collocated with an existing distribution line. The ROW from Industrial Park Substation west to High Hill Switching Station is approximately 150-foot wide. From the High Hill Switching Station west to the Bell Rock Substation (approximately 5.4 miles), the existing 115-kV transmission line is located on single circuit H-frame structures within an approximately 150-foot-wide ROW, and transitions from Eversource territory to National Grid territory at the Dartmouth/Fall River municipal border. The New Line is to be constructed predominantly overhead, except for the construction of two short sections of underground cable (a total of approximately 600 linear feet) to be installed to avoid multiple overhead line crossings at the Industrial Park Tap and at the High Hill Switching Station. There will be no changes to the existing 115-kV transmission lines or structures located within the existing ROW.

5. The Station Work includes upgrades to the protection and control schemes at Bell Rock, Tremont and Acushnet Substations. This includes installation of a 115-kV line trap and tuner at the Bell Rock Substation to complete the termination for the New Line. Work at Tremont and Acushnet Substations will consist of limited underground conduit installation and/or be contained within the existing station control buildings. No fence line expansion or removal of existing equipment is required to accommodate these necessary improvements.

6. Simultaneously herewith, the Companies are submitting: (a) a petition with the Department of Public Utilities (the “Department”) requesting approval of the New Line in accordance with G.L. c. 164, § 72 (“Section 72 Petition”); and (b) motions filed with the Department and the Siting Board requesting that the Department refer the Section 72 Petition to the Siting Board and that the Siting Board consolidate each of the petitions for its review. See G.L. c.

25, § 4; G.L. c. 164 § 69H(2). The Companies incorporate by reference the Section 72 Petition together with all attachments into this Section 69J Petition. The Section 69J Petition and Attachment A appended thereto, a document entitled *Acushnet to Fall River Reliability Project – Analysis to Support the Petition Before the Energy Facilities Siting Board* (the “Analysis”), provide the factual basis for the Companies’ conclusion that the Project is necessary to maintain a reliable supply of electricity in the Commonwealth while balancing issues of cost and environmental impacts in accordance with G.L. c. 164, §§ 69H, 69J.

III. STANDARD OF REVIEW

7. In accordance with Section 69J, before approving a petition to construct a proposed energy facility, the Siting Board requires an applicant to justify its proposal in four phases. First, the Siting Board requires the applicant to show that additional energy resources are needed (see Analysis, Section 2). Second, the Siting Board requires the applicant to establish that, on balance, its proposed project is superior to alternative approaches in terms of reliability, cost and environmental impact, and in its ability to address the identified need (see Analysis, Section 3). Third, the Siting Board requires the applicant to show that it has considered a reasonable range of practical facility siting alternatives and that the proposed site (or route) for the facility is superior to alternative sites (or routes) in terms of cost, environmental impact and reliability of supply (see Analysis, Sections 4 and 5). Finally, the applicant must show that its plans for construction of its new facilities are consistent with the current health, environmental protection, and resource use and development policies as developed by the Commonwealth (see Analysis, Section 6). As demonstrated throughout the Analysis, the Project satisfies the Siting Board’s standards and relevant precedent for jurisdictional facilities.

A. The Project Is Needed.

8. Section 69J provides that the Siting Board should approve a petition to construct if it determines that the petition meets certain requirements, including that the plans for the construction of the applicant's facilities are consistent with the policies stated in G.L. c. 164, § 69H to provide a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost. In carrying out its statutory mandate with respect to proposals to construct energy facilities in the Commonwealth, the Siting Board evaluates whether there is a need for additional energy resources to meet: (1) reliability objectives; (2) economic efficiency objectives; or (3) environmental objectives. NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-03/D.P.U. 19-15, at 7 (2021) ("Eversource Andrew Sq./Dewar"); New England Power Company d/b/a National Grid, EFSB 19-04/D.P.U. 19-77/19-78, at 10 (2021) ("NEP Beverly-Salem"); NSTAR Electric Company d/b/a Eversource Energy, EFSB 17-02/D.P.U. 17-82/17-83, at 15 (2019) ("Eversource Sudbury-Hudson"); NSTAR Electric Company d/b/a Eversource Energy, EFSB 16-02/D.P.U. 16-77, at 8-9 (2018) ("Eversource West Roxbury-Needham"); NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 15-04/D.P.U. 15-140/15-141, at 9-10 (2018) ("Eversource/NEP Woburn-Wakefield"). Accordingly, the need for a particular facility can be demonstrated by showing need on any (or all) of those three bases. ECC Remand, 1 DOMSB 213, at 411-12 & n.264 (1993); see, e.g., Eversource Andrew Sq./Dewar at 7; NEP Beverly-Salem at 10; Eversource Sudbury-Hudson at 15; Eversource West Roxbury-Needham at 8-9; Eversource/NEP Woburn-Wakefield at 9-10.

9. To ensure reliability, each transmission and distribution company establishes planning criteria for construction, operation, and maintenance of its transmission and distribution system. Eversource Andrew Sq./Dewar at 7; NEP Beverly-Salem at 10; Eversource Sudbury-

Hudson at 15; Eversource West Roxbury-Needham at 8-9; Eversource/NEP Woburn-Wakefield at 9-10. Compliance with the applicable planning criteria demonstrates a “reliable” system. Id.

10. To determine whether system improvements are needed, the Siting Board: (1) examines the reasonableness of the Companies’ system reliability planning criteria; (2) determines whether the Companies use reviewable and appropriate methods for assessing system reliability over time based on system modeling analyses or other valid reliability indicators; and (3) determines whether the relevant transmission and distribution system meets these reliability criteria over time under normal conditions and under reasonable contingencies, given existing and projected loads. Eversource Andrew Sq./Dewar at 7; NEP Beverly-Salem at 10; Eversource Sudbury-Hudson at 15; Eversource West Roxbury-Needham at 8-9; Eversource/NEP Woburn-Wakefield at 9.

11. When a petitioner’s analysis of system reliability and facility requirements is driven, at least in part, by load projections, the Siting Board reviews the underlying load forecast. Eversource Andrew Sq./Dewar at 7; NEP Beverly-Salem at 11; Eversource Sudbury-Hudson at 15; Eversource West Roxbury-Needham at 9; Eversource/NEP Woburn-Wakefield at 9-10. The Siting Board requires that forecasts be based on substantially accurate historical information and reasonable statistical projection methods that include an adequate consideration of conservation and load management. G.L. c. 164, § 69J; Eversource Andrew Sq./Dewar at 7; NEP Beverly-Salem at 11; Eversource Sudbury-Hudson at 15; Eversource West Roxbury-Needham at 9; Eversource/NEP Woburn-Wakefield at 9-10. To ensure that this standard has been met, the Siting Board requires that forecasts be reviewable, appropriate and reliable. Eversource Andrew Sq./Dewar at 7-8; NEP Beverly-Salem at 11; Eversource Sudbury-Hudson at 15; Eversource West Roxbury-Needham at 9; Eversource/NEP Woburn-Wakefield at 9-10. A forecast is reviewable if it contains enough information to allow a full understanding of the forecast method; a forecast is appropriate if the

method used to produce the forecast is technically suitable to the size and nature of the company to which it applies; and a forecast is considered reliable if its data, assumptions and judgments provide a measure of confidence in what is most likely to occur. Id.

12. The need for the Project was first identified in ISO-NE's "Southeastern Massachusetts and Rhode Island Area 2026 Solutions Study" ("2026 Solutions Study"), issued in March 2017. The continuing need for the Project was confirmed in ISO-NE's "Southeastern and Rhode Island Area 2029 Needs Assessment Update" ("2029 Needs Update"), issued in October 2020 and based on ISO-NE's 2020 Capacity, Energy, Loads and Transmission ("CELT") Report forecasts. As discussed more fully in Section 2, the Project addresses the potential for thermal overloads and emerging voltage concerns on the Companies' systems. These system reliability needs are immediate and require resolution by the Companies to maintain a reliable system in the Southeastern Massachusetts and Rhode Island ("SEMA-RI") Area.

B. The Companies Considered Alternatives to the Project.

13. The Siting Board is required to evaluate proposed projects to ensure a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost. See G.L. c. 164, § 69H. In addition, Section 69J requires a proposed project proponent to present alternatives to the proposed facility, which may include: (a) other methods of transmitting or storing energy; (b) other sources of electrical power or natural gas; or (c) a reduction of requirements through load management. Eversource Andrew Sq./Dewar at 24; NEP Beverly-Salem at 17; Eversource Sudbury-Hudson at 27; Eversource West Roxbury-Needham at 13; Eversource/NEP Woburn-Wakefield at 18.

14. In implementing its statutory mandate, the Siting Board requires a petitioner to show that, on balance, its proposed project is superior to alternative approaches in terms of reliability,

cost, environmental impact, and ability to meet a previously identified need. Eversource Andrew Sq./Dewar at 24; NEP Beverly-Salem at 17; Eversource Sudbury-Hudson at 27; Eversource West Roxbury-Needham at 13-14; Eversource/NEP Woburn-Wakefield at 18. In addition, the Siting Board requires a petitioner to consider reliability of supply as part of its showing that the proposed project is superior to alternative project approaches. Eversource Andrew Sq./Dewar at 24; NEP Beverly-Salem at 17; Eversource Sudbury-Hudson at 27; Eversource West Roxbury-Needham at 14; Eversource/NEP Woburn-Wakefield at 18-19.

15. The Companies have comprehensively identified and analyzed various alternatives to address the identified needs for the Project. In order to determine the approach that best balances reliability, cost, and environmental impact, and in accordance with Section 69J and Siting Board precedent, the Companies evaluated a series of project approach alternatives for their potential to address the needs identified. Section 3 of the Analysis describes the detailed analyses undertaken by the Companies to identify and evaluate alternative means to address the needs identified in Section 2, including: (1) a No-Action Alternative; (2) transmission alternatives; and (3) non-transmission alternatives (“NTAs”) such as new generation, energy efficiency, demand response programs, solar and battery storage systems, and distributed generation. As described in Section 3 of the Analysis, the Companies analyses show that construction of the Project is the best approach to meeting the identified need based on a balancing of reliability, cost, and environmental impacts.

16. Accordingly, the New Line was advanced to the transmission routing analysis presented in Section 4 of the Analysis.

C. The Companies Properly Evaluated Alternative Routes.

17. The Siting Board has a statutory mandate to implement the policies of G.L.

c. 164, §§ 69J-69Q to provide a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost. G.L. c. 164, §§ 69H, 69J. Further, Section 69J requires the Siting Board to review alternatives to planned projects, including “other site locations.” In implementing this statutory mandate, the Siting Board requires a petitioner to demonstrate that it has considered a reasonable range of practical siting alternatives and that the proposed facilities are sited at locations that minimize costs and environmental impacts while ensuring supply reliability. Eversource Andrew Sq./Dewar at 34; NEP Beverly-Salem at 29; Eversource Sudbury-Hudson at 50; Eversource West Roxbury-Needham at 21; Eversource/NEP Woburn-Wakefield at 34. To do so, an applicant must satisfy a two-pronged test: (1) the applicant must first establish that it developed and applied a reasonable set of criteria for identifying and evaluating alternative routes in a manner that ensures that it has not overlooked or eliminated any routes that, on balance, are clearly superior to the proposed route; and (2) the applicant must establish that it identified at least two noticed sites or routes with some measure of geographic diversity. Eversource Andrew Sq./Dewar at 34; NEP Beverly-Salem at 29; Eversource Sudbury-Hudson at 50; Eversource West Roxbury-Needham at 21; Eversource/NEP Woburn-Wakefield at 34-35.

18. The Siting Board has also stated that, while the Siting Board has required past applicants to provide a noticed alternative route for their proposals, the practice of doing so is not mandated by Section 69J and the Siting Board has accepted that a noticed alternative route may not be warranted in all cases. Colonial Gas Company d/b/a National Grid, EFSB 18-01/D.P.U. 18-30, at 40-41 (2019) (“National Grid Lowell”); Colonial Gas Company d/b/a National Grid, EFSB 16-01, at 28 (2016) (“National Grid Mid Cape”).

19. The Companies engaged in a comprehensive route selection process to determine the best route that contributes to a reliable energy supply at the lowest possible cost and that results

in the least environmental impact with respect to the construction and operation of the Project. As a result of this analysis, the Companies identified a Preferred Route and determined that specifying a noticed alternative route for the New Line was not warranted in this instance because all of the alternative routes considered by the Companies were substantially inferior from a cost perspective and scored worse than the Preferred Route. Due primarily to the substantial inferiority on cost, the Companies would have no intention of constructing the New Line along any alternative route and thus concluded that creating a noticed alternative route would serve little benefit and have the potential to raise concern unnecessarily among certain abutters. The route selection process and the identification of the Preferred Route for the New Line is described in Section 4 of the Analysis.

D. Environmental Impacts, Cost and Reliability of the Project Have Been Appropriately Evaluated.

20. In implementing its statutory mandate to ensure a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost, the Siting Board requires a petitioner to show that its proposed facility is sited at a location that minimizes costs and environmental impacts while ensuring a reliable energy supply. National Grid Lowell at 42; National Grid Mid Cape at 29. To evaluate the proposed facility, the Siting Board first determines whether the petitioner has provided sufficient information regarding environmental impacts and potential mitigation measures to enable the Siting Board to make such a determination. Id. The Siting Board then examines the environmental impacts of the proposed facility and determines: (1) whether environmental impacts would be minimized; and (2) whether an appropriate balance would be achieved among conflicting environmental impacts as well as among environmental impacts, cost and reliability. National Grid Lowell at 42-43; National Grid Mid Cape at 29.

21. The Companies conducted a comprehensive analysis of the environmental impacts

associated with the Project and will take steps to appropriately minimize and mitigate such impacts. Overall, the Companies' analysis demonstrates that the Project will achieve an appropriate balance among conflicting environmental concerns as well as among environmental impacts, reliability and cost. The cost, reliability and environmental impacts analyses are set forth in Section 5 of the Analysis.

E. The Project Meets the Siting Board's Consistency Standards in Accordance with Section 69J and Precedent.

22. Section 69J states, inter alia, that the Siting Board shall approve a petition to construct a facility if it determines that "plans for expansion and construction of the applicant's new facilities are consistent with current health, environmental protection, and resource use and development policies as adopted by the Commonwealth."

23. The Project is necessary to ensure the reliable supply of electricity to customers in SEMA-RI. Section 6 of the Analysis demonstrates that the construction and operation of the Project is consistent with current health, environmental protection and resource use and development policies as adopted by the Commonwealth of Massachusetts, including the Electric Utility Restructuring Act of 1997, the Green Communities Act (c. 169 of the Acts of 2008), the Global Warming Solutions Act (c. 298 of the Acts of 2008), the Energy Diversity Act (c. 188 of the Acts of 2016), the Clean Energy Act (c. 227 of the Acts of 2018), and An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy (c. 8 of the Acts of 2021).

IV. CONCLUSION

WHEREFORE, Eversource and National Grid respectfully request that the Siting Board, pursuant to G.L. c. 164, § 69J, conduct a public hearing on this Petition (and on any matters referred to the Siting Board from the Department) and take such other action as may be necessary to: (i) grant the Companies the authority to construct the Project as more particularly described in the

attached Analysis; (ii) find that such construction is required in order to provide a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost; and (iii) find that the construction of the Project is consistent with current health, environmental, and resource use and development policies as adopted by the Commonwealth of Massachusetts and the policies stated in G.L. c. 164, § 69H.

Respectfully Submitted,

**NSTAR ELECTRIC COMPANY d/b/a
EVERSOURCE ENERGY and NEW ENGLAND
POWER COMPANY d/b/a NATIONAL GRID**

By their attorneys,



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Michael J. Koehler, Esq.
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-and-



Marisa L. Pizzi, Esq.
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Dated: December 22, 2021

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

Petition of NSTAR Electric Company d/b/a)	
Eversource Energy and New England Power)	
Company d/b/a National Grid for Approval to)	EFSB 21-04
Construct, Operate and Maintain a New 115-kV)	
Transmission Line in Acushnet, New Bedford,)	
Dartmouth and Fall River Pursuant to)	
G.L. c. 164, § 69J)	

**MOTION OF NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY AND
NEW ENGLAND POWER COMPANY d/b/a NATIONAL GRID FOR PROTECTIVE
TREATMENT OF CRITICAL ENERGY INFRASTRUCTURE INFORMATION**

I. INTRODUCTION

NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) and New England Power Company d/b/a National Grid (“National Grid”) (together, the “Companies”) hereby request, pursuant to G.L. c. 25, § 5D and 220 C.M.R. § 1.04(5)(e), that the Energy Facilities Siting Board (the “Siting Board”) and the Department of Public Utilities (“Department”), as appropriate, recognize and confirm the application of the exemption from public disclosure for certain critical energy infrastructure information (“CEII”) included within appendices to an analysis prepared on behalf of the Companies and entitled *Acushnet to Fall River Reliability Project – Analysis to Support the Petition Before the Energy Facilities Siting Board* (the “Analysis”). On this date, the Companies have submitted a request, pursuant to the provisions of G.L. c. 164, § 69J, that the Siting Board approve the Companies’ petition to construct, operate and maintain a new, approximately 12.1-mile 115-kilovolt (“kV”) primarily overhead electric transmission line along existing rights-of-way (“ROW”) between Eversource’s Industrial Park Tap in Acushnet, Massachusetts and National Grid’s Bell Rock Substation in Fall River, Massachusetts (the

“Section 69J Petition”), all as more fully described therein and referred to as the “Acushnet to Fall River Reliability Project,” or the “Project.” The Analysis was provided as Attachment A of the Companies’ Section 69J Petition. By this Motion, the Companies requests that the Siting Board protect the following documents from public disclosure:

- Appendix 2-1 of the Analysis, which is a document, entitled Southeastern Massachusetts and Rhode Island Area 2026 Solutions Study, dated March 2017;
- Appendix 2-2 of the Analysis, which is a document, entitled Southeastern Massachusetts and Rhode Island Area 2029 Needs Assessment Update, dated November 2020; and
- Appendix 2-3 of the Analysis, which is a document, entitled Southeastern Massachusetts and Rhode Island Area 2026 Needs Assessment, dated May 2016.

These documents are referred to herein as the “Confidential CEII.” The Confidential CEII contained in Appendices 2-1, 2-2, and 2-3 includes highly sensitive information about the Southeastern Massachusetts/Rhode Island (“SEMA-RI”) transmission system, the public disclosure of which may represent a threat to safety and service reliability to the extent that the recipient of the documents can determine potential vulnerabilities on the Eversource, NEP and SEMA-RI transmission systems. The redacted information qualifies as CEII under the Federal Energy Regulatory Commission’s (“FERC”) definition of CEII as set forth in 18 C.F.R. § 388.113(c). The Companies treat this information as highly confidential. Such information requires confidential, protected treatment in the interest of public safety.

A proposed Nondisclosure Agreement for CEII with Eversource and NEP is provided in Attachment A hereto. The Companies would require the execution of this Nondisclosure Agreement for CEII prior to providing any party with Confidential CEII as defined herein. The Confidential CEII is being provided to the Siting Board under seal and subject to this Motion.

II. STANDARD OF REVIEW

FERC's regulations, 18 C.F.R. § 388.113(c)(2), define CEII as follows:

Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
- (ii) Could be useful to a person in planning an attack on critical infrastructure;
- (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and
- (iv) Does not simply give the general location of the critical infrastructure.

Consistent with the FERC rules, the Massachusetts Public Records Law is set forth at G.L. c. 66, § 10 and provides the parameters for public access to documents in the possession of state and local government agencies. G.L. c. 66, § 10. G.L. c. 4, § 7 sets forth definitions of statutory terms used in the General Laws, and clause 26 of that section contains the definition of the term "public records." The Massachusetts General Court has provided specific protection for certain kinds of utility infrastructure information by excluding such documents from the definition of a "public record." Specifically, "public records" are defined by statute as:

all books, papers, maps, photographs, recorded tapes, financial statements, statistical tabulations, or other documentary materials or data, regardless of physical form or characteristics, made or received by any officer or employee of any agency, executive office, department, board, commission, bureau, division or authority of the commonwealth, or of any political subdivision thereof, or of any authority established by the general court to serve a public purpose, unless such materials or data fall within the following exemptions in that they are:

G.L. c. 4, § 7, clause 26 (emphasis added). Among the various exceptions to a "public record" are:

(n) records, including, but not limited to, blueprints, plans, policies, procedures and schematic drawings, which relate to internal layout and structural elements, security measures, emergency preparedness, threat or vulnerability assessments, or any other records relating to the security or safety of persons or buildings, structures, facilities, utilities, transportation, cyber security or other infrastructure located within the commonwealth, the disclosure of which, in the reasonable judgment of the record custodian, subject to review by the supervisor of public records under subsection (c) of section 10 of chapter 66, is likely to jeopardize public safety or cyber security.

G.L. c. 4, § 7, clause 26(n) (emphasis added). See 980 C.M.R. § 4.03(2) (“[r]ecords shall not be made available to the public if they are within any of the enumerated exemptions in the 26th clause of M.G.L. c. 4, § 7”). The Siting Board and the Department have both historically treated the Confidential CEII Information as information to be protected from public disclosure. See NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 15-04/D.P.U. 15-140/15-141, Presiding Officer Ruling at 4 (January 27, 2016) (treating the information as provided in the Confidential CEII as CEII and protecting such information from public disclosure); New England Power Company d/b/a National Grid, D.P.U. 15-44/15-45, Hearing Officer Ruling at 3 (May 13, 2015) (same); NSTAR Electric Company, EFSB 10-2/D.P.U. 10-131/10-132, Presiding Officer Ruling at 3 (March 1, 2011) (treating load flow and schematic diagrams, transmission studies and updates, and presentations to PAC comparing project alternatives as CEII and protecting such information from public disclosure).

III. ARGUMENT

The Companies seek protection from public disclosure the Confidential CEII described above. The Confidential CEII contained in Appendices 2-1, 2-2, and 2-3 is exempt from the definition of a “public record” and, therefore, should be protected from public disclosure because this information provides specific details concerning critical energy infrastructure of the Companies. The Companies do not disclose this information to the public in the normal course of

conducting business and take steps to protect this information from unauthorized or accidental disclosure. Public disclosure of this information would be contrary to the public interest and represents an undue risk to public safety in that this information could be used by terrorists to plan and carry out a targeted attack on specific utility infrastructure serving the Companies' most critical customers.

The Confidential CEII meets FERC's definition of CEII set forth at 18 C.F.R. § 388.113(c) and contains highly sensitive information, the public disclosure of which may present a threat to public safety and service reliability. Specifically, this information: (1) depicts detailed engineering information about the design of bulk electric facilities that could be useful to a person planning an attack on critical infrastructure; and (2) provides power flow cause-and-effect information that would be useful in identifying critical energy infrastructure targets. Accordingly, in view of the statutory determination under G.L. c. 4, § 7, clause 26(n), that such important energy infrastructure information is not to be publicly disclosed, the Siting Board should determine that the Confidential CEII is exempt from public disclosure because it is not a "public record."

In certain instances, the Siting Board has granted motions for protective treatment on the condition that protective treatment will lapse after a period of time. In such cases, the protected information is often of a financial nature or involves competitive bids. The competitive value of that type of information (and the harm caused by disclosure) generally erodes over time, and a reasonable sunset provision can be appropriate. However, the need for protection of Confidential CEII from public disclosure should not lapse because the information about utility infrastructure will not change for decades. There is no basis for assuming that the threat to public safety that may result from disclosure of Confidential CEII will abate after a set period of time. Furthermore, where such critical infrastructure information clearly falls within the exemption from the definition

of a public record set forth in G.L. c. 4, § 7, clause 26(n), there is no legal basis for the Siting Board to apply a “sunset” provision, for the reason that if such information is not a public record, there can be no requirement that it be made public. Accordingly, the Companies’ respectfully request that the Siting Board and the Department take such actions as may be necessary or appropriate to accord permanent protection to the Confidential CEII. See NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 15-04/D.P.U. 15-140/15-141, Presiding Officer Ruling at 4 (January 27, 2016); New England Power Company d/b/a National Grid, D.P.U. 15-44/15-45, Hearing Officer Ruling at 3 (May 13, 2015); New England Power Company d/b/a National Grid, EFSB 13-2/D.P.U. 13-151/13-152 (Sept. 30, 2013); NSTAR Electric Company, D.P.U. 13-64, Hearing Officer Ruling, at 3 (July 8, 2013); New England Power Company d/b/a National Grid, EFSB 12-1/D.P.U. 12-46/12-47, Hearing Officer Ruling on Motion for Confidential Treatment, at 3 (June 27, 2012); NSTAR Electric Company, D.P.U. 07-61, Hearing Officer Ruling on NSTAR Electric Motion for Confidential Treatment, at 3 (February 26, 2008).

IV. CONCLUSION

For all of the foregoing reasons, Eversource and National Grid request that the Siting Board (or, as appropriate, the Department) rule that good cause exists to protect from disclosure the Confidential CEII described herein indefinitely because it meets all applicable standards and definitions for such protection.

Respectfully Submitted,

**NSTAR ELECTRIC COMPANY d/b/a
EVERSOURCE ENERGY and NEW ENGLAND
POWER COMPANY d/b/a NATIONAL GRID**

By their attorneys,



David S. Rosenzweig, Esq.
Michael J. Koehler, Esq.
Keegan Werlin LLP
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-and-



Marisa L. Pizzi, Esq.
National Grid USA Service Company, Inc.
d/b/a National Grid
40 Sylvan Road
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(781) 907-2114

Dated: December 22, 2021

CEII NON-DISCLOSURE AGREEMENT**EFSB 21-04/D.P.U. 21-149**

This NON-DISCLOSURE AGREEMENT (the “Agreement”) is made by the undersigned _____ of _____ (“Recipient”) with a principal place of business at _____, in favor of NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) with its primary address located at 800 Boylston Street, Boston, MA 02199 and New England Power Company d/b/a National Grid (“National Grid”) with its primary business address located at 40 Sylvan Road Waltham, MA 02451 (Eversource and National Grid together referred to as the “Companies” or the “Disclosers”).

WHEREAS, the Recipient has requested that the Companies disclose to the Recipient certain information, all or a portion of which may be classified by the Companies as Critical Energy Infrastructure Information; and

WHEREAS, the Federal Energy Regulatory Commission has defined Critical Energy Infrastructure Information (“CEII”) as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552 (2000); and (4) does not simply give the general location of the critical infrastructure,” (see 18 C.F.R. § 388.113(c)(2));

WHEREAS, the Energy Facilities Siting Board (the “Siting Board”) has recognized that CEII must be protected from public disclosure pursuant to state law (see G.L. c. 66, § 10 and G.L. c. 4, § 7) and Department of Public Utilities regulations (see 220 C.M.R. § 1.04(5)(e)) and has ruled that parties to this proceeding may have access to CEII only through a Non-Disclosure Agreement; and

WHEREAS, the Companies must comply with federal and state rules and regulations relative to CEII generally and the Companies’ CEII protection policies in particular.

NOW, THEREFORE, for good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the parties hereto wish to enter into this Agreement to protect and safeguard the confidentiality of that information and agree as follows:

Section I: Critical Energy Infrastructure Information

1. Definition of CEII. For purposes of this Agreement, “Critical Energy Infrastructure Information” or “CEII” shall mean: (i) all information designated as such by the Companies, consistent with all applicable definitions and standards, whether furnished before or after the date hereof, whether oral, written or recorded/electronic, and regardless of the manner in which it is furnished; and (ii) all reports, summaries, compilations, analyses, notes or other information which contain such information.

2. Labeling of CEII: All CEII and documents furnished subject to the terms of this Agreement shall be referred to and labeled as “CONFIDENTIAL CEII.” Confidential CEII shall not include any information or document contained in the public files of the EFSB, or any other federal or state agency.

3. Use and Protection of CEII.

(a) All CEII shall be maintained by Recipient in a secure place. Recipient shall receive all CEII in strict confidence, shall exercise reasonable care to maintain the confidentiality and secrecy of the CEII, and shall not divulge CEII to any third party without the consent of the Companies. Access to materials shall be limited to other individuals who have executed this Non-Disclosure Agreement. Recipients may make notes of CEII, which shall be treated as CEII if they contain CEII.

(b) Although a Recipient of CEII may use CEII as foundation for advice provided to his or her employer, he/she may only discuss CEII with or disclose CEII to other individuals who have executed this Non-Disclosure Agreement. A Recipient may check with the Companies to determine whether another individual is a Recipient who has executed this Non-Disclosure Agreement. If other employees, colleagues or co-workers require receipt of CEII, those individuals must also sign a Non-Disclosure Agreement.

(c) A Recipient will not knowingly use CEII directly or indirectly for any illegal or non-legitimate purpose.

(d) Recipient shall, and shall cause its representatives to, strictly comply with this Agreement and with any and all laws, rules and regulations (including without limitation, FERC rules, regulations, orders, and policies) applicable to any CEII of Eversource or NEP or that relates to any of their affiliates’ facilities. This Section shall survive any termination, expiration or cancellation of this Agreement. The Recipient shall, and shall cause its representatives to, continue to comply with this Section with respect to the receipt of or access to any CEII by the Recipient notwithstanding termination, expiration or cancellation of the Agreement.

(e) In the event that the Recipient is required to disclose CEII by subpoena, law or other directive of a court, administrative agency or arbitration panel, the Recipient hereby agrees to provide the Companies with prompt notice of such request or requirement in order to enable the Companies to (i) seek an appropriate protective order or other remedy, (ii) consult with the Recipient with respect to taking steps to resist or narrow the scope of such request or legal process, or (iii) waive compliance, in whole or in part, with the terms of this Agreement. In the event that such protective order or other remedy is not obtained, or the Companies waive compliance with the provisions hereof, the Recipient hereby agrees to furnish only that portion of the CEII which the Recipient’s counsel advises is legally required and to exercise best efforts to obtain assurance that confidential treatment will be accorded such CEII.

(f) The Recipient shall be responsible for any breach of the terms of the Agreement by the Recipient or any of its representatives.

4. Return of CEII. In the event that either one or both of the Companies, in their sole discretion, so requests, the Recipient will promptly deliver to the Company or Companies all CEII, including all copies, reproductions, summaries, compilations, analyses or extracts thereof.

5. Change in Status. If there is a change in status of the Recipient to his/her employer he/she must inform the Companies immediately in writing at the address given above (Attention: Mary E. Grover at Eversource Energy and Marisa Pizzi at NEP), and promptly return the CEII to the Companies or destroy the CEII. The Companies may require the return or destruction of the CEII.

6. CEII "on Loan". CEII provided pursuant to this Agreement is deemed to be on loan and must be returned to the Companies upon request immediately after termination of this Proceeding, including any appellate litigation. In addition, unless otherwise agreed by the parties, Recipient shall destroy any notes, memoranda and other documents and information, including the erasure of electronic information, derived from CEII, upon request immediately after termination of the Proceeding, except in the case of an appeal, where documents containing CEII shall be destroyed after the final resolution of such appeal. Counsel for the Recipient shall certify in writing that such destruction has been accomplished. If the Recipient is an employee of a federal or State agency, he/she must note that the information is not the property of the agency, and is not subject to Freedom of Information/Public Records acts, the Massachusetts Public Records law, or similar statutes. In addition, if the Recipient is an employee of the Commonwealth of Massachusetts, he/she must note that the CEII information qualifies under federal law for restricted and limited use/distribution, and may only be disclosed to specifically designated persons, both with prior approval by the Companies.

7. No Warranty. The CEII is provided "as is" with all faults. In no event shall the Companies be liable for the accuracy or completeness of the CEII. The Companies shall not have liability to the Recipient, or any other person or entity, for the Recipient's use of any CEII disclosed pursuant to this Agreement.

8. Equitable Relief; Audit. The provisions of this Agreement are necessary for the protection of the business and goodwill of the parties and are considered by the parties to be reasonable for such purpose. Recipient agrees that any breach of this Agreement may cause the Disclosers substantial and irreparable damages and, therefore, in the event of any such breach or threatened breach, in addition to other remedies which may be available, the Disclosers shall have the right to specific performance and other injunctive and equitable relief, it being acknowledged that legal remedies are inadequate. The Companies may audit the Recipient's compliance with this Agreement.

9. Survival. The Recipient obligations and duties under this Agreement shall survive any expiration or termination unless the Companies rescind the CEII designation.

10. No Waiver. The Recipient understands and agrees that no failure or delay by the Companies in exercising any right, power or privilege hereunder shall operate as a waiver thereof, nor shall any single or partial exercise thereof preclude any other or further exercise thereof or the exercise of any right, power or privilege hereunder.

11. Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the Commonwealth of Massachusetts without regard to its conflicts of laws principles.

12. Assignment Prohibited. The Recipient may not assign rights, obligations or duties under this Agreement without prior express written consent of the Companies.

13. Entire Agreement. This Agreement contains the entire agreement between the parties concerning the protection of CEII, and no modification of this Agreement or waiver of the terms and conditions hereof shall be binding upon the parties, unless approved in writing by each of them.

14. Severability. If any provision or provisions of this Agreement shall be held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby.

IN WITNESS WHEREOF, the Recipient has executed this Non-Disclosure Agreement as of the date set forth below.

Recipient: (if you are a consultant, please provide the name and contact information of an individual at the organization that retained you so your role may be verified):

Signature: _____

Name (please print): _____

Date: _____

Title: _____

Organization on whose behalf CEII is requested: _____

Address: _____

Phone: _____

Reason for CEII Request: EFSB 21-04/D.P.U. 21-149

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

Petition of NSTAR Electric Company d/b/a)	
Eversource Energy and New England Power)	
Company d/b/a National Grid for Approval to)	EFSB 21-04
Construct, Operate and Maintain a New 115-kV)	
Transmission Line in Acushnet, New Bedford,)	
Dartmouth and Fall River Pursuant to)	
G.L. c. 164, § 69J)	

Petition of NSTAR Electric Company d/b/a)	
Eversource Energy and New England Power)	
Company d/b/a National Grid for Approval to)	D.P.U. 21-149
Construct, Operate and Maintain a New 115-kV)	
Transmission Line in Acushnet, New Bedford,)	
Dartmouth and Fall River Pursuant to)	
G.L. c. 164, § 72)	

**MOTION OF NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY
AND NEW ENGLAND POWER COMPANY d/b/a NATIONAL GRID TO
CONSOLIDATE THE ABOVE-CAPTIONED PROCEEDINGS**

Now comes NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) and New England Power Company d/b/a National Grid (“National Grid”) (together, the “Companies”), seeking consolidation of the above-captioned proceedings for review by the Energy Facilities Siting Board (“Siting Board”). In support thereof, the Companies state as follows:

1. On this date, the Companies filed a petition with the Department of Public Utilities (the “Department”), pursuant to G.L. c. 164, § 72, seeking a determination that the Companies’ proposal to construct, operate and maintain an approximately 12.1-mile 115-kilovolt (“kV”) primarily overhead electric transmission line along existing rights-of-way (“ROW”) between Eversource’s Industrial Park Tap in Acushnet, Massachusetts and

National Grid’s Bell Rock Substation in Fall River, Massachusetts (the “New Line”)¹ is necessary, serves the public convenience, and is consistent with the public interest (the “Section 72 Petition”) (D.P.U. 21-149).

2. The New Line, which will travel through portions of Acushnet, New Bedford, Dartmouth, and Fall River, together with related improvements at three existing substations, are referred to herein as the Acushnet to Fall River Reliability Project, or the “Project.”

3. Also on this date, the Companies filed with the Siting Board a petition for approval of the Project pursuant to G.L. c. 164, § 69J (the “Section 69J Petition”) (EFSB 21-04).

4. Consistent with Department precedent, the Companies filed a motion today with the Department seeking that the Section 72 Petition be referred to the Siting Board. By this Motion to the Siting Board, the Companies are requesting that the Section 72 Petition be consolidated with the Section 69J Petition for the issuance of a consolidated order by the Siting Board. New England Power Company d/b/a National Grid, EFSB 19-04/D.P.U. 19-77/19-78, at 5-6 (2021); NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-03/D.P.U. 19-15, at 2 (2021); NSTAR Electric Company d/b/a Eversource Energy, EFSB 17-02/D.P.U. 17-82/17-83, at 4 (2019); NSTAR Electric Company d/b/a Eversource Energy, EFSB 16-02/D.P.U. 16-77, at 4 (2018); NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 15-04/D.P.U. 15-140/15-141, at 4 (2018).

¹ Of the New Line, 7.9 miles will be in Acushnet, New Bedford, and Dartmouth and will be owned and operated by Eversource; 4.2 miles will be in Fall River and will be owned and operated by National Grid.

5. Consolidation of these matters is contemplated by G.L. c. 25, § 4, which states: “In order to promote efficiency in administration... [the chairman of the Department] may refer matters related to the need for, construction of, or siting of facilities, as defined in section sixty-nine G of chapter one hundred and sixty-four, as [the chairman] deems appropriate to the [Siting Board] in accordance with section 69H of chapter one hundred and sixty-four.” Similarly, G.L. c. 164, § 69H states that the Siting Board may “accept for review and approval or rejection any application, petition, or matter related to the need for, construction of, or siting of facilities referred to the chairman of the [D]epartment pursuant to section four of chapter twenty-five.”

6. Similarly, the Department “may order proceedings involving a common question of law or fact to be consolidated for hearing on any or all of the matters in issue in such proceedings.” 220 C.M.R. § 1.09.

7. The Companies’ Project meets the consistent standards of the Siting Board and Department under G.L. c. 164, §§ 69J and 72, respectively, because these facilities are: (a) necessary to ensure a reliable energy supply with a minimum impact on the environment at the lowest possible cost; and (b) needed and will serve the public interest.

8. Each petition involves common questions of law and fact, and consolidation of the proceedings would further the interests of administrative efficiency.

WHEREFORE, Eversource and National Grid respectfully request that the Siting Board consolidate the Section 72 Petition with the Section 69J Petition.

Respectfully Submitted,

**NSTAR ELECTRIC COMPANY d/b/a
EVERSOURCE ENERGY and NEW
ENGLAND POWER COMPANY d/b/a
NATIONAL GRID**

By their attorneys,



David S. Rosenzweig, Esq.
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-and-



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Dated: December 22, 2021

COMMONWEALTH OF MASSACHUSETTS

ENERGY FACILITIES SITING BOARD
DEPARTMENT OF PUBLIC UTILITIES

Petition of NSTAR Electric Company d/b/a)
Eversource Energy and New England Power)
Company d/b/a National Grid for Approval to) EFSB 21-04
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Construct, Operate and Maintain a New 115-kV)
Transmission Line in Acushnet, New Bedford,)
Dartmouth and Fall River Pursuant to)
G.L. c. 164, § 72)

APPEARANCE OF COUNSEL

We, David S. Rosenzweig and Michael J. Koehler, hereby appear for and on behalf of NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid in the above-captioned proceedings.

Respectfully Submitted,

 David S. Rosenzweig, Esq. Keegan Werlin LLP 99 High Street, Suite 2900 Boston, MA 02110 (617) 951-1400 drosen@keeganwerlin.com	 Michael J. Koehler, Esq. Keegan Werlin LLP 99 High Street, Suite 2900 Boston, MA 02110 (617) 951-1400 mkoehler@keeganwerlin.com
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COMMONWEALTH OF MASSACHUSETTS

ENERGY FACILITIES SITING BOARD
DEPARTMENT OF PUBLIC UTILITIES

Petition of NSTAR Electric Company d/b/a)
Eversource Energy and New England Power)
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Construct, Operate and Maintain a New 115-kV)
Transmission Line in Acushnet, New Bedford,)
Dartmouth and Fall River Pursuant to)
G.L. c. 164, § 72)

APPEARANCE OF COUNSEL

I, Marisa L. Pizzi, hereby appear for and on behalf of New England Power Company
d/b/a National Grid in the above-captioned proceedings.

Respectfully Submitted,



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