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REDACTED MATERIALS ENCLOSED

November 8, 2019

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

Re: NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-06

Dear Mr. Greene:

Enclosed are an original and five (5) copies of a petition by NSTAR Electric Company d/b/a Eversource Energy (“Eversource” or the “Company”), 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 12.5-mile, overhead 115-kilovolt (“kV”) electric transmission line (the “New Line”) along an existing Eversource right-of-way (“ROW”) between Eversource’s Bourne Switching Station and West Barnstable Substation. The proposed New Line, which will travel through Bourne, Sandwich and Barnstable, together with the related station improvements, is referred to as the Mid Cape Reliability Project, or the “Project.”

Attachment A to the Section 69J Petition, entitled *Analysis to Support Petitions Before the Energy Facilities Siting Board – Mid Cape Reliability Project* (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, § 69J and Siting Board precedent and standards, the Petition demonstrates that the Project will ensure a reliable supply of energy for the Commonwealth with the least environmental impact and at the lowest possible cost.

In conjunction with the Section 69J Petition, the Company is also filing with the Department of Public Utilities (the “Department”) on this date, petitions pursuant to G.L. c. 164, § 72 (the “Section 72 Petition”) (D.P.U. 19-142) and G.L. c. 40A, § 3 (the “Zoning Petition”) (D.P.U. 19-143). Consistent with precedent, the Company is filing a motion with the

Department requesting that the Section 72 Petition and the Zoning Petition be referred to the Siting Board for consolidated review with the Section 69J Petition for the Mid Cape Reliability Project. Accordingly, enclosed is a Motion for Consolidation.

- **The Need for the Project**

With respect to the need for the Project, the Mid Cape Reliability Project is part of a larger plan to reinforce the Southeastern Massachusetts transmission system and to bring the system into compliance with applicable national and regional reliability standards. The Project is one of approximately 25 individual transmission projects to emerge from an extended transmission study, the Southeastern Massachusetts and Rhode Island (“SEMA-RI”) Assessment, which was led by the Independent System Operator of New England (“ISO-NE”). The Project is needed to resolve potential thermal overloads and low voltage conditions that could result in the loss of electric service to the entire Cape Cod area and the islands of Martha’s Vineyard and Nantucket, totaling over 500 megawatts of load. Such an outage could affect over 200,000 customers in the Cape Cod area. The need for the Project is present at existing load levels and; thus, there is an immediate need for the Project in order to continue to reliably serve customers.

The Company also offers for the Siting Board’s consideration a variation in the Project design intended to provide flexibility for the future expansion of the electric system on Cape Cod to accommodate the likely need to interconnect new renewable energy generation. This “Noticed Variation” is to build the Project’s transmission structures to be capable of operating at 345-kV should the need for operation at that voltage materialize in the future. To meet the current identified need for the Project and to minimize the potential siting, cost, community and environmental impacts of building an entirely distinct 345-kV line or rebuilding the proposed 115-kV line to 345-kV standards in the future, the Company is presenting the Noticed Variation to build the Project to 345-kV standards but to operate it at 115 kV. If the Noticed Variation is approved and the need for the New Line to be operated at 345 kV materializes in the future, the Company would return to the Siting Board for permission to operate the line at 345 kV at that time.

- **Additional Project Filing Documents**

The Company notes that certain information contained in two appendices to Attachment A to the Section 69J Petition qualifies as Critical Energy Infrastructure Information (“CEII”) and must be protected from public disclosure. Appendix 2-1 (SEMA-RI Area Transmission Needs Assessment, May 2016) and Appendix 3-1 (SEMA-RI Transmission Solutions Study, February 2017) each contain CEII. Accordingly, this information has been redacted from the public filing in order to avoid disclosure of confidential information. The Company submits herewith a Motion for Protective Treatment of Critical Energy Infrastructure Information. Under separate cover, the Company is submitting five confidential (non-redacted) copies of Appendix 2-1 and Appendix 3-1 containing CEII under seal to the Siting Board.

In addition, enclosed herewith is:

- Notices of Appearance of Counsel;
- 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 and the Zoning Petition will be referred to the Siting Board and consolidated with the Section 69J Petition for review; and
- A flash drive of the entire filing.

In accordance with statutory requirements, the Company has forwarded a copy of the Petitions to the Towns of Bourne, Sandwich and Barnstable.

Please date stamp a copy of this letter and return it to the messenger for our files. 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 fluid and cursive, with the first name "David" and last name "Rosenzweig" clearly distinguishable.

David S. Rosenzweig

Enclosures

cc: Joan Foster Evans, General Counsel, Energy Facilities Siting Board (w/out att.)
Mark Marini, Secretary, Department of Public Utilities (with att.)
Shane Early, General Counsel, Department of Public Utilities (w/out att.)