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Petition of NSTAR Electric Company d/b/a)	
Eversource Energy Pursuant to G.L. c. 164, § 72)	
for Approval to Construct and Operate a New)	D.P.U. 19-142
115-kV Electric Transmission Line Through the)	
Towns of Bourne, Sandwich, and Barnstable)	
)	

Petition of NSTAR Electric Company)
d/b/a Eversource Energy Pursuant to)
G.L. c. 40A, § 3 for Individual and Comprehensive) D.P.U. 19-143
Exemptions from the Zoning Ordinance)
of the Town of Barnstable)
)

Now comes NSTAR Electric Company d/b/a Eversource Energy (“Eversource” or the “Company”) seeking the referral of the above-captioned proceedings by the Department of Public Utilities (“Department”) to the Energy Facilities Siting Board (“Siting Board”) for review. In support thereof, Eversource states as follows:

1. On this date, Eversource filed a petition with the Department, pursuant to G.L. c. 164, § 72, seeking a determination that a proposed, approximately 12.5-mile, overhead 115-kilovolt (“kV”) electric transmission line (“New Line”) located along an existing Eversource right-of-way (“ROW”) between Eversource’s Bourne Switching Station and West Barnstable Substation (the “New Line”) is necessary, serves the public convenience and is consistent with the public interest (the “Section 72 Petition”) (DPU 19-142).

2. On this date, the Company also filed a petition with the Department, pursuant to G.L. c. 40A, § 3, seeking individual and comprehensive zoning exemptions from the *Zoning Ordinance of the Town of Barnstable* (the “Barnstable Zoning Ordinance”) in connection with the Company’s proposed modifications to the existing West Barnstable Substation (the “Zoning Petition”) (D.P.U. 19-143).
3. The New Line, together with the related station improvements, are referred to as the Mid Cape Reliability Project, or the “Project.”
4. Also on this date, the Company filed with the Siting Board a petition for approval of the Project pursuant to G.L. c. 164, § 69J (the “Section 69J Petition”) (EFSB 19-06).
5. Consistent with Department precedent, Eversource requests that the Section 72 Petition and the Zoning Petition be referred to the Siting Board. By separate motion to the Siting Board, the Company is requesting that, once referred, the Section 72 Petition and the Zoning Petition be consolidated with the Section 69J Petition for the issuance of a consolidated order. NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 15-04/D.P.U. 15-140/15-142, at 4 (2018); NSTAR Electric Company d/b/a Eversource Energy, EFSB 15-03/D.P.U. 15-64/15-65, at 4 (2017); NSTAR Electric Company, EFSB 10-2/D.P.U. 10-131/10-132, at 2 (2012).
6. 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.” 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.”

7. 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.
8. The Company’s Project meets the 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 environmental at the lowest possible cost; and (b) needed and will serve the public interest by providing a necessary source of transmission in order to ensure the reliable and economic operation of the transmission grid on behalf of the Company’s customers. In addition, the Project satisfies the requirements for zoning exemptions pursuant to G.L. c. 40A, § 3 because it is “reasonably necessary for the convenience or welfare of the public.”
9. Each of the three petitions involves common questions of law and fact and consolidation would further the interests of administrative efficiency.

WHEREFORE, Eversource respectfully requests that the Department refer the Section 72 Petition and the Zoning Petition to the Siting Board for consolidation with the Section 69J Petition.

Respectfully Submitted,

**NSTAR ELECTRIC COMPANY d/b/a
EVERSOURCE ENERGY**

By its attorneys,

A handwritten signature in black ink, appearing to read "David S. Rosenzweig", is positioned above a horizontal line.

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