

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

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Petition of NSTAR Electric Company d/b/a)	
Eversource Energy Pursuant to G.L. c. 164, § 69J)	
for Approval to Construct and Operate a New)	EFSB 19-06
115-kV Electric Transmission Line Between the)	
Bourne Switching Station and West Barnstable)	
Substation)	
)	
)	
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)	
)	

**MOTION OF NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY
TO CONSOLIDATE THE ABOVE-CAPTIONED PROCEEDINGS**

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

1. On this date, the Company filed a petition with the Department of Public Utilities (the “Department”), pursuant to G.L. c. 164, § 72, seeking a determination that the proposed, approximately 12.5-mile, overhead 115-kV electric transmission

- line between Eversource's Bourne Switching Station and Eversource's West Barnstable Substation (the "New Line") is necessary, serves the public convenience and is consistent with the public interest (the "Section 72 Petition") (D.P.U. 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 at the Bourne Switching Station and the West Barnstable Substation, 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 filed a motion today with Department seeking that the Section 72 Petition and the Zoning Petition be referred to the Siting Board. By this Motion to the Siting Board, the Company is requesting that the Section 72 Petition and the Zoning Petition be consolidated with the Section 69J Petition for the issuance of a consolidated order by the Siting Board. NSTAR Electric Company d/b/a Eversource Energy and New England Power Company d/b/a National Grid, EFSB 15-04, at 4 (2018); NSTAR Electric Company d/b/a Eversource Energy, EFSB 15-03, at 4 (2017); Boston Edison

Company d/b/a NSTAR Electric, EFSB 04-1/D.T.E. 04-5/D.T.E. 04-7, at 3 (2005); Cambridge Elec. Light Co., EFSB 00-3/D.T.E. 00-103, at 2 (2001).

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.” 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.”
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 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. In addition, the Project satisfies the requirements for zoning exemptions pursuant to G.L. c. 40, § 3 because it is “reasonably necessary for the convenience or welfare of the public.”

9. All three petitions involve common questions of law and fact, and consolidation of the proceedings would further the interests of administrative efficiency.

WHEREFORE, Eversource respectfully requests that the Siting Board consolidate the Section 72 Petition and the Zoning Petition with the Section 69J Petition.

Respectfully Submitted,

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

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