



For a thriving New England

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November 18, 2021

**BY ELECTRONIC SUBMISSION ONLY**

Scott Seigal, Hearing Officer  
Massachusetts Department of Public Utilities  
One South Station  
Boston, MA 02110

Subject: D.P.U. Docket No. 21-50: Notice of Inquiry by the D.P.U. on its own  
Motion into Procedures for Enhancing Public Awareness of and  
Participation in its Proceedings

Dear Hearing Officer Seigal:

Enclosed herein for filing in the above-referenced matter, please find:

1. Conservation Law Foundation's Motion to Late-File Comments;
2. Conservation Law Foundation's Updated Comments in D.P.U. Docket No. 21-50 Clean;
3. Conservation Law Foundation's Updated Comments in D.P.U. Docket No. 21-50 Redlined; and
4. Certificate of Service.

Kindly file in the usual manner. Please contact Priya Gandbhir at [pgandbhir@clf.org](mailto:pgandbhir@clf.org) with any questions or concerns. Thank you for your time and attention to this matter.

Very truly yours,

Priya Gandbhir, Esq.  
Staff Attorney

CC: [dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov)  
Service List

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

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Notice of Inquiry by the D.P.U. on its own	)	
Motion into Procedures for Enhancing Public	)	
Awareness of and Participation in its	)	D.P.U. 21-50
Proceedings	)	

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**MOTION TO LATE-FILE COMMENTS**

NOW COMES Conservation Law Foundation (“CLF”), a non-profit environmental advocacy organization with a business address of 62 Summer Street, Boston, MA, and respectfully moves that the Massachusetts Department of Public Utilities (“DPU”) allow CLF to late file comments in the above-captioned matter. In support of this motion, CLF states as follows:

1. CLF is a member-supported environmental advocacy organization with members throughout Massachusetts.
2. CLF has a long history of advocacy before the DPU and has an interest in ensuring that DPU’s procedures for conducting public proceedings are conducted in a fair, equitable, and expeditious manner for the benefit of all Massachusetts residents.
3. CLF filed timely comments in this matter; the present filing is an update to those comments to ensure consistency with comments CLF filed in a related matter at the Energy Facilities Siting Board (EFSB 21-01: *Inquiry to Examine Procedural Enhancements to Increase Public Awareness of and Participation in EFSB Proceedings*).
4. CLF has good cause to file its revised comments, and the presiding officer should utilize his discretion under the DPU’s procedural rules to allow CLF to file this update (220 C.M.R. 1.02(5)).

5. The updated comment letter revises CLF's responses to Questions 1, 4, and 6 with regard to language translation and interpretation.
6. CLF has revised its response to Question 1 to remove reference to requiring language translation based on a threshold of the language spoken by at least 2 percent or 100 residents, whichever is lower, and add a recommendation that the DPU work with the Executive Office of Energy and Environmental Affairs to determine a threshold to trigger translation and interpretation requirements.
7. CLF has revised its response to Question 4 to remove reference to requiring language translation based on a threshold of the languages spoken by at least 2 percent or 100 residents, whichever is lower, and added a recommendation for stakeholder involvement in setting translation requirements as to public notices and project information and coordination of translation of project documents.
8. CLF has revised its response to Question 6 to add specific best practices for providing interpretation during public hearings.
9. Based on a conversation in late October between CLF staff, other environmental justice advocates, and Rishi Reddi from the Executive Office of Energy and Environmental Affairs ("EEA"), we anticipate a forthcoming meeting between EEA staff and language access stakeholders regarding data that should be used to inform thresholds that trigger translation and interpretation requirements.
10. To ensure consistency between comments filed in this proceeding and EFSB 21-01 and recent discussions with EEA, CLF respectfully requests that the Department find that CLF had good cause to update its comment letter in this proceeding and accept CLF's updated comments dated November 9, 2021.

Respectfully submitted on this 18th Day of November, 2021

BY:

CONSERVATION LAW FOUNDATION

By its attorneys:

A handwritten signature in cursive script, appearing to read "Pgandbhir".

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Priya Gandbhir  
Staci Rubin  
Conservation Law Foundation  
62 Summer Street  
Boston, MA 02110  
Phone: 617-850-1777

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

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Notice of Inquiry by the D.P.U. on its own )  
Motion into Procedures for Enhancing )  
Public Awareness of and Participation in its ) D.P.U. 21-50  
Proceedings d/b/a Eversource Energy )  
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**CERTIFICATE OF SERVICE**

I, Priya Gandbhir, in accordance with 220 CMR 1.00, et seq., hereby certify that on this day the 18th of November 2021, I have served true copies of the documents included herewith by electronic mail to the Service List for the above-captioned proceeding.

Respectfully submitted on this 18th day of November 2021

BY:

CONSERVATION LAW  
FOUNDATION

By its attorneys:



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Staci Rubin  
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