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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)	
)	

Now comes NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) and New England Power Company d/b/a National Grid (“National Grid”), seeking a determination from the Department of Public Utilities (the “Department”) that, pursuant to G.L. c. 164, § 72 (“Section 72”), 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”). 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

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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.” In support thereof, the Company states as follows:

1. Eversource, with a principal place of business at 800 Boylston Street, 17th Floor, Boston, Massachusetts 02199, is an electric company as defined by G.L. c. 164, § 1 and, therefore, is authorized to transmit electricity. See NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-03/D.P.U. 19-15, at 104-05 (2021) (“Eversource Andrew Sq./Dewar”); NSTAR Electric Company d/b/a Eversource Energy, EFSB 17-02/D.P.U. 17-82/17-83, at 221 (2019) (“Eversource Sudbury-Hudson”); NSTAR Electric Company d/b/a Eversource Energy, EFSB 16-02/D.P.U. 16-77, at 77-78 (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 151-52 (2018) (“Eversource/NEP Woburn-Wakefield”).

2. National Grid, with a principal place of business at 40 Sylvan Road, Waltham, MA, 02451, is an electric company as defined by G.L. c. 164, § 1 and, therefore, is authorized to transmit electricity. See New England Power Company d/b/a National Grid, EFSB 19-04/D.P.U. 19-77/19-78, at 129-31 (2021) (“NEP Beverly-Salem”); New England Power Company d/b/a National Grid, D.P.U. 19-16, at 5-6 (2020) (“NEP Golden Rock”).

3. The Companies are represented by David S. Rosenzweig, Esq., and Michael J. Koehler, Esq., Keegan Werlin LLP, 99 High Street, Suite 2900, Boston, MA 02110. National Grid is represented by Marisa L. Pizzi, Senior Counsel, 40 Sylvan Road, Waltham, MA 02451.

4. The New Line satisfies the Department’s standards under Section 72 because the Project is needed and will serve the public interest by increasing the reliability of the Companies’

transmission system in the Southeastern Massachusetts – Rhode Island (“SEMA-RI”) area.

5. 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 feet 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 feet 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.

6. 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.

7. Simultaneously herewith, the Company is also filing: (a) a petition to the Energy Facilities Siting Board (the “Siting Board”) requesting approval of the construction of the Project pursuant to G.L. c. 164, § 69J (the “Section 69J Petition”) (EFSB 21-04); and (b) a motion with

the Department to refer this Section 72 Petition to the Siting Board and to consolidate each of the petitions for review by the Siting Board.

8. Pursuant to G.L. c. 164, § 72, an electric company seeking approval to construct a transmission line must file a petition with the Department for:

[A]uthority to construct and use or to continue to use as constructed or with altered construction a line for the transmission of electricity for distribution in some definite area or for supplying electricity to itself or to another electric company or to a municipal lighting plant for distribution and sale . . . and shall represent that such line will or does serve the public convenience and is consistent with the public interest . . . The department, after notice and a public hearing in one or more of the towns affected, may determine that said line is necessary for the purpose alleged, and will serve the public convenience and is consistent with the public interest.

9. In making a determination under G.L. c. 164, § 72, the Department considers all aspects of the public interest. Boston Edison Company v. Town of Sudbury, 356 Mass. 406, 419 (1969); Eversource Andrew Sq./Dewar at 104; NEP Beverly-Salem at 129; Eversource Sudbury-Hudson at 219; NEP Golden Rock at 6; Eversource West Roxbury-Needham at 77; Eversource/NEP Woburn-Wakefield at 152; NSTAR Electric Company, D.P.U. 13-177/13-178, at 41 (2015) (“NSTAR Seafood Way”); NSTAR Electric Company, D.P.U. 13-126/13-127, at 40 (2014) (“NSTAR Electric Avenue”). All factors affecting any phase of the analyses performed by a company in connection with the public interest and public convenience are weighed fairly by the Department in a determination under G.L. c. 164, § 72. Town of Sudbury v. Department of Public Utilities, 343 Mass. 428, 430 (1962).

10. In evaluating petitions filed under G.L. c. 164, § 72, the Department examines: (1) the need for, or public benefits of, the present or proposed use; (2) the environmental impacts or any other impacts of the present or proposed use; and (3) the present or proposed use and any alternatives identified. Eversource Andrew Sq./Dewar at 104; NEP Beverly-Salem at 130;

Eversource Sudbury-Hudson at 219; NEP Golden Rock at 6; Eversource West-Roxbury-Needham at 77-78; Eversource/NEP Woburn-Wakefield at 152; NSTAR Seafood Way at 41; NSTAR Electric Avenue at 40. In determining whether a proposed project is reasonably necessary for the public convenience or welfare, the Department balances the interests of the general public against the local interests and determines whether the line is necessary for the purpose alleged and will serve the public convenience and is consistent with the public interest. Id. The Department undertakes “a broad and balanced consideration of all aspects of the general public interest and welfare and not merely [make an] examination of the local and individual interests that might be affected.” New York Central Railroad v. Department of Public Utilities, 347 Mass. 586, 592 (1964).

11. The Section 69J Petition, including its Attachment A, a document entitled *Acushnet to Fall River Reliability Project – Analysis to Support the Petition Before the Energy Facilities Siting Board* (the “Analysis”), is incorporated herein by reference and made a part hereof. The Project is more particularly described in Section 1 of the Analysis. The Analysis provides the factual basis for the Companies’ conclusion that the Project meets the consistent standards of the Siting Board and Department under G.L. c. 164, §§ 69J and 72, respectively, because the Project is necessary to provide a reliable energy supply for the Commonwealth while minimizing cost and environmental impacts.

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.

13. The Companies 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, 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.

14. The Companies also undertook a thorough and objective analysis to identify the preferred Project route, which included an evaluation of environmental impacts, reliability, and cost of various potential routes. The Project routing options that were considered are described in Section 4 of the Analysis.

15. The Companies have conducted detailed analyses of the environmental impacts of the Project, has identified the relevant impacts and has proposed measures to minimize impacts associated with the construction and operation of the Project. 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. Comprehensive information regarding the minimization of impacts is set forth in Section 5 of the Analysis.

16. As required under Section 72, and in support of this Petition, a description of the Project and an estimate of its costs are included in the Analysis. The Department's Section 72 Checklist is provided as Attachment A to this Petition and a draft hearing notice (including an electronic version in MS Word format) is being provided along with the Section 69J Petition. In further compliance with the Department's Section 72 Checklist, USGS locus maps and diagrams of the proposed transmission line routes can be found in Sections 1, 4 and 5 of the Analysis. A list of all permits required for the Project is found in Section 6 of the Analysis. Lastly, a copy of the Companies' Expanded Environmental Notification Form ("EENF") submitted pursuant to the Massachusetts Environmental Policy Act on November 15, 2018, as well as the Certificate of the Secretary of Energy and Environmental Affairs on the EENF dated December 28, 2018, are provided as Appendix 1-1 and Appendix 1-2, respectively, of the Analysis.

WHEREFORE, the Companies respectfully request that the Department (or, as appropriate, the Siting Board), pursuant to G.L. c. 164, § 72, and after due notice and a public hearing, determine that the construction of the Project is necessary for the purposes stated, will serve the public convenience and will be consistent with the public interest, and thus, authorize the Company to construct and operate the Project.

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
99 High Street, Suite 2900
Boston, MA 02110
(617) 951-1400

-and-



Marisa L. Pizzi, Esq.
National Grid USA Service Company, Inc.
d/b/a National Grid
40 Sylvan Road
Waltham, MA 02451
(781) 907-2114

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