

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

PREFILED TESTIMONY OF CHRISTINA M. WOLF

1 **Q. Please state your name and business address.**

2 A. My name is Christina M. Wolf and my business address is 988 Howard Avenue, Suite
3 200, Burlingame, California, 94010.

4 **Q. What is your position with Medway Grid, LLC (also referred to by the witness as**
5 **“Medway Grid” or the “Company”) and what are your responsibilities?**

6 A. I am the Director of Development for the Medway Grid energy storage project. My
7 responsibilities are focused on managing the development of the Project, including, but
8 not limited to, obtaining necessary permits, securing the land to construct the Project,
9 including but not limited to negotiating the interconnection agreement, working on
10 Project schedule and budget, and assisting with the design and layout of the Project
11 Site.

12 **Q. Please describe your educational background and professional experience.**

13 A. I obtained my Bachelor of Arts in Urban Studies and Environmental Studies from the
14 University of Pennsylvania and a Juris Doctor from Temple University. I have over 20
15 years of professional experience in regional planning, land use law, and development,
16 including project development for Google LLC and SunEdison.

Q. Please describe this Project.

17 A. Medway Grid, LLC (the “Company” or the “Applicant” or “Medway Grid” is proposing to
18 construct a 250 MW/500 MWh stand-alone battery energy storage system and an
19 ancillary new electric substation (“the Project Substation”), to be located in the Town of
20 Medway, Massachusetts (“the Project Site”). As part of the Project, the Company is also
21 proposing to construct a new 345kV underground transmission line interconnection (“the

1 Proposed Transmission Interconnection”) from the proposed Project Substation to
2 Eversource Energy’s existing West Medway Substation (“the Eversource Substation”), a
3 distance of approximately 1,325 linear feet.

4 **Q. What is the purpose of your testimony?**

5 A. I am sponsoring testimony in support of the information included in the Petition at
6 Sections 1 through 3, and 6 through 8, including, but not limited to, specifics of the
7 Project, the processes involved in selecting the Project Site and information about the
8 community outreach that the Company conducted with the Town of Medway. Moreover,
9 I will detail how the Project will be used to help meet the capacity needs of ISO-NE’s
10 Southeast New England (SENE) capacity zone.

11 **Q. Who else will be testifying on behalf of the Company?**

12 A. In addition to myself, we have six expert witnesses. Marc Bergeron, AJ Jablonowski and
13 Robert O’Neil, all principals with Epsilon Associates, Inc., and Ben Cotts, a principal with
14 Exponent. All four gentlemen will testify with respect to any impacts that the Project will
15 have on the environment, including, but not limited to, water, wetlands, stormwater, solid
16 and hazardous waste, air quality, noise, emissions, archeological sites and animal
17 species. Jason Knedlhans, Director, Energy Storage Solutions for the Medway Grid
18 project will testify as to safety of the Project. Justin Adams, the Company’s Director of
19 Permitting will testify as to all aspects of Medway Grid’s Project development, including,
20 but not limited to, the selection of Tesla as its proposed battery manufacturer and the
21 technology design and operational parameters that makes this battery safe and reliable
22 for projects of this size.

23 **Q. Please tell us about the Preferred site.**

24 A. As is explained in detail in Section 2.0 of the Company’s application to the EFSB, the
25 Project is located on an approximately 10.6 acres in size. The Project itself will be built on

1 approximately 5.2 acres of the Property, of which approximately 0.85 acres is developed.
2 There is an existing Eversource electric transmission corridor to the west along with the
3 existing Eversource West Medway Substation and the Exelon Corporation West Medway
4 Generating Station to the south.

5 **Q. Does Medway Grid control the land?**

6 A. Yes. Medway Grid maintains Options to Purchase with the current owners of the parcels
7 that make up the property. Prior to construction of the Project, Medway Grid will exercise
8 the Purchase and Sale Agreements with the current owners of each parcel, all of which
9 have already been negotiated.

10 **Q. Is the Company seeking any zoning waivers and/or exemptions from the Town of**
11 **Medway to construct and operate this Project?**

12 A. Yes. The Project is located in an area of the Town that is zoned as a
13 Residential/Agricultural district (AR-II district), which does not allow a BESS to be
14 constructed as of right. Moreover, the Project involves construction of a project
15 substation that will contain components that exceed the height limits of the AR-II district.
16 Per the Town's by-laws, no variances and/or Special Permits are allowed. Thus,
17 concomitant to the EFSB Petition, the Company has petitioned the Department of Public
18 Utilities (the "Department"), pursuant to G.L. c. 40A, § 3 for an individual and
19 comprehensive zoning exemption. The Company has filed a motion to consolidate the
20 40A petition into the EFSB 22-02 docket for the Siting Board's review and approval. As
21 detailed in the 40A petition, the individual zoning exemptions required for this Project
22 pertain to use, height, lot shape, and noise.

23 **Q. Is the Company seeking other approvals from the Department?**

24 A. Yes. The Company is seeking the Department's approval, pursuant to G.L. c 164,
25 §72, to construct and operate an approximately 1,325 foot underground 345 kilovolt

1 ("kV") electric transmission line (the "New Line") designed to interconnect the
2 proposed 250 MW / 500 MWh standalone battery energy storage system ("BESS") to
3 Eversource's existing West Medway Substation (the Eversource Substation").

4 **Q. What other permits are required for the Company to commence construction?**

5 A. Construction is subject to obtaining federal, state and local permits and/or approvals
6 and/or certificates, including, but not limited to, the National Pollutant Discharge
7 Elimination System General Permit for Discharges from Construction Activities (per the
8 U.S. Environmental Protection Agency), the Massachusetts Environmental Policy Act
9 Office, The Massachusetts Energy Facilities Siting Board, the Massachusetts
10 Department of Public Utilities, the Massachusetts State Historic Preservation Office, and
11 numerous permits from the Town of Medway, as are detailed in Section 3.0 of the EFSB
12 Petition.

13 **Q. Do you know if Eversource intends to seek approval from the Department of**
14 **Public Utilities or other state agencies for the changes to its substation?**

15 A. It is my understanding that Eversource is in the process of evaluating what, if any,
16 approvals it might need for the upgrades necessary for the Project.

17 **Q. Does this conclude your testimony?**

18 A. Yes.

CHRISTINA MICHELLE WOLF

EXECUTIVE SUMMARY

Regional planner and land use attorney with 20 years of experience in community work and real estate. For the last 10 years I have been focused on renewable energy project development.

PROFESSIONAL EXPERIENCE

Able Grid Energy Solutions, Inc.
Boulder, CO

Director of Development, October 2018- present

Direct development activities for utility-scale energy storage projects in California, Massachusetts, New York, Virginia, and New Jersey. Assist with project and portfolio investments and acquisitions.

- Conduct land searches, title review, and environmental due diligence for site selection
- Negotiate option agreements, ground leases and purchase and sale agreements
- Direct permitting efforts, present at public hearings, collaborate with government officials and stakeholders
- Contract with energy utilities for interconnection agreements, offtake, transmission line easements
- Manage project schedule and budget; coordinate with engineering and construction teams on project design

Google LLC
San Francisco, CA

Strategic Negotiator, May 2016 - October 2018

Negotiated land purchase agreements, public water and sewer infrastructure contracts, and tax incentive agreements to develop and expand Google's data center locations throughout the U.S. Established and maintained relationships with state and local government representatives and utilities, including Secretaries of Commerce, Directors of Finance, Directors of Public Works, City Managers.

SunEdison
San Francisco, CA

Director of Development, DG West, November 2014 - January 2016
Senior Development Manager, Utility and DG, January 2013 – October 2014
Project Development Manager, Utility, April 2011 – December 2012

In management role, directed a 12-person team of developers and analysts to develop distributed generation ("DG") groundmount, rooftop and canopy solar projects throughout the western U.S. Managed over \$760 million in assets under team development - over 300 wholesale, customer-sited, and community solar photovoltaic power plants in Utah, Minnesota and California.

In developer role, worked with utilities, elected officials, external consultants, landowners and neighbors on distribution- and transmission-level power plants in the Caribbean and mainland U.S. Directed development on 10 now-operational solar projects, totaling over 55 megawatts ("MWs") direct current ("DC"), ranging in size from 2 - 26MWs (15 - 200 acre project footprints).

Holland & Knight, LLP
San Francisco, California

Associate, October 2007 - November 2010

Supported clients in obtaining and defending land use and environmental approvals, focusing on compliance with Federal and State natural resources laws, climate change law, California Environmental Quality Act (CEQA), and planning and zoning law.

Sanger & Olson, a Law Corporation
San Francisco, California

Associate, September 2005 - September 2007

Supported clients on real estate and land use matters, focusing on redevelopment, planning and zoning law, and CEQA.

Cherry Hill Township, Department of Community Development
Cherry Hill, New Jersey

Director, January 2001 - August 2002
Acting Director, August 2000 - December 2000
Planning Board Administrator – January 2000-July 2000

Directed the zoning and planning processes for a large municipality (population 70,000), including the Master Plan update. Oversaw the Township's affordable housing programs, including Section 8 and Township-owned rental housing. Assisted with design and creation of the Township's land preservation/acquisition program. Co-organized the Township's Economic Development Corporation events and initiatives. Managed an eight person staff and reported directly to the Mayor.

EDUCATION

University of California, Berkeley Law
Berkeley, CA

Visiting Scholar, Fall 2004 – Spring 2005

Temple University School of Law
Philadelphia, PA

Fall 2002 – Spring 2004, J.D., May 2005

University of Pennsylvania
Philadelphia, PA

B.A., Urban Studies & Environmental Studies, May 1998
Magna Cum Laude, Phi Beta Kappa

AFFIDAVIT OF CHRISTINA M. WOLF

I, Christina M. Wolf, attest that:

1. I am testifying on behalf of Medway Grid, LLC before the Massachusetts Energy Facilities Siting Board in docket EFSB 22-02.
2. This pre-filed testimony and the sections included in the Petition that I am sponsoring were prepared by me or under my supervision and control.
3. I hereby swear or affirm that the information contained in my prefiled testimony is true and accurate to the best of my knowledge.



Christina M. Wolf