

**COMMONWEALTH OF MASSACHUSETTS  
ENERGY FACILITIES SITING BOARD**

**PREFILED TESTIMONY OF BENJAMIN R.T. COTTS**

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

2 A. My name is Benjamin R.T. Cotts. I am a senior managing engineer with  
3 Exponent. My business address is 17000 Science Drive, Bowie MD 20715

5 **Q Please provide an overview of Exponent.**

6 A. Exponent is an international scientific and engineering consulting firm with offices  
7 in the U.S., Europe and Asia. We have over 800 consultants, including more  
8 than 500 that have earned a doctorate in their chosen field of specialization; our  
9 multidisciplinary team of scientists, engineers, physicians perform in-depth  
10 research and analysis in more than 90 technical disciplines. Exponent is certified  
11 to ISO 9001 and is authorized by the General Services Administration (GSA) to  
12 provide professional engineering services.

13 **Q. On behalf of what company are you offering your testimony in this docket?**

14 A. I am testifying on behalf of Medway Grid LLC, which is requesting approval to construct  
15 a 250MW/500 MWh standalone Battery Energy Storage System and underground 1,325  
16 foot electric transmission line in Medway, Massachusetts.

17 **Q. What is your educational background and professional expertise?**

18 A. I hold a Bachelor of Science degree in Electrical Engineering from the University  
19 of Portland. I received both my Master of Science and Doctorate degrees in  
20 Electrical Engineering from Stanford University. My professional expertise  
21 includes both applied and theoretical electromagnetics, including modeling and

1 measurement analyses of natural and anthropogenic electromagnetic fields. My  
2 curriculum vitae is submitted as Exhibit BRTC-1.

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

4 A. I am offering testimony on the electric and magnetic fields associated with the proposed  
5 project, exposure guidelines, and a summary of national and international standards  
6 limiting exposure to EMF as detailed in Section 4.0 of the supporting documentation  
7 appended to the Petition.

8 **Q. Please identify any regulatory proceedings in which you have previously testified.**

9 A. I have provided expert testimony before the Alberta Utilities Commission, the  
10 Connecticut Siting Council, the Kentucky Public Service Commission, the New York  
11 Public Service Commission, and the Pennsylvania Public Utility Commission as well as  
12 the Superior Court of Quebec, and the Supreme Court of British Columbia.

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

14 A. Yes.



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Engineering & Scientific Consulting

## Benjamin R.T. Cotts, Ph.D., P.E.

Senior Managing Engineer | Electrical Engineering & Computer Science  
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(301) 291-2519 tel | bcotts@exponent.com

### Professional Profile

Dr. Cotts is experienced in both applied and theoretical electromagnetics and plasma physics including modeling and measurement analyses of natural and anthropogenic electromagnetic fields such as space weather, and geomagnetic storms as well as in the initiation, field effects, and characteristics of lightning discharges. Dr. Cotts performs modeling and measurement studies of power system EMF, audible noise, and radio noise including evaluations of 500-kV AC and  $\pm 560$  kV DC transmission lines. Dr. Cotts has further experience in modeling magnetic fields and induced electric fields for offshore wind farms including those from wind turbines, offshore substations and subsea AC and DC transmission lines and is an officer in the IEEE working group for Corona and Field Effects overseeing IEEE standards 644, 430, 656, 1542, 1227, 2746, 1829 and 1308.

Dr. Cotts also performs various types of electromagnetic field evaluations for devices and systems including smart meter mesh networks and government/military communications facilities as well as exposure, EMI or EMC assessments. These assessments are provided for clients such as federal and state agencies, utilities, hospitals, medical-device manufacturers, construction developers, the U.S. military. In addition, Dr. Cotts regularly receives requests to perform exposure assessments for patients with pacemakers, ICDs, and other implantable medical devices and to remediate EMI issues for medical devices and in health care settings.

Dr. Cotts has been a leading figure in coordinating scientific outreach to developing countries through the United Nations International Heliophysical Year (IHY) and International Space Weather Initiative (ISWI) programs and was a founding member of a NASA/UN-sponsored conference series organized and led multiple conferences on atmospheric and space science.

Dr. Cotts's has a decade of experience with the initiation, field effects, and propagation of lightning discharges; combining remote sensing measurements of ionospheric disturbances with numerical modeling of atmospheric, ionospheric, and magnetospheric interactions to determine the role of global lightning on the removal of radiation belt electrons. These radiation belt electrons are a critical factor in space weather for determining the effective lifetime of spacecraft with electronics that can be irreversibly damaged by radiation belt electrons.

Additionally, Dr. Cotts software engineering experience includes the use of Matlab, C, C++, and a variety of other scientific packages including Mathematica and COMSOL. He has experience with auditing software processes and algorithms used during his investigations related to control systems involved in failure events.

## Academic Credentials & Professional Honors

Ph.D., Electrical Engineering, Stanford University, 2011

M.S., Electrical Engineering, Stanford University, 2004

B.S., Electrical Engineering, University of Portland, summa cum laude, 2002

Outstanding Student Paper Award, AGU Fall Meeting, San Francisco, California, 2004

Tau Beta Pi Engineering Honor Society

Delta Epsilon Sigma, National Scholastic Honor Society

Awarded "2017 IEEE Standards Medallion" For contributions to standards development in power and energy distribution.

Awarded the "2014 Fire Protection Research Foundation Medal" by the NFPA's Fire Protection Research Foundation for the 2013 research project ("Best Practices for Emergency Response to Incidents Involving Electric Vehicles Battery Hazards: A Report on Full-Scale Testing Results") that best exemplified the Foundation's fire safety mission at the National Fire Protection Association's Conference & Exposition, June 2014

## Licenses and Certifications

Licensed Professional Electrical Engineer, California, #21277

## Prior Experience

Post Doctoral Scholar, University of Colorado, Denver, 2011

International Science Outreach Manager, Stanford University, 2007-2011

Research Assistant, Stanford University, 2002-2011

Energy Research Fellow, Stanford Linear Accelerator Center, 2001

## Professional Affiliations

Institute of Electrical and Electronics Engineers — IEEE

International Committee on Electromagnetic Safety — ICES

International Council on Large Electric Systems — CIGRÉ

## Publications

### Peer Reviewed Publications

Gołkowski M, Gross NC, Moore RC, Cotts BRT, Mitchell M. Observation of local and conjugate ionospheric perturbations from individual oceanic lightning flashes. *Geophysical Research Letters* 2014; 41:273-279. doi:10.1002/2013GL058861.

NaitAmor, S, Cohen MB, T. Cotts BR, Ghalila H, AlAbdoadaim MA, Graf K. Characteristics of long

recovery early VLF events observed by the North African AWESOME Network. *Journal of Geophysical Research: Space Physics* 2013; 10.1002/jgra.50448

Haldoupis, C, Cohen M, Arnone E, Cotts B, Dietrich S. The VLF fingerprint of elves: Step-like and long-recovery early VLF perturbations caused by powerful &plusmn;CG lightning EM pulses. *Journal of Geophysical Research: Space Physics*, 2013. doi: 10.1002/jgra.50489.

Haldoupis C, Cohen M, Cotts B, Arnone E, Inan U. Long-lasting D-region ionospheric modifications, caused by intense lightning in association with elve and sprite pairs. *Geophysical Research Letters* 2012; 39:L16801. doi:10.1029/2012GL052765.

Salut MM, Abdullah M, Graf KL, Cohen MB, Cotts BRT, Kumar S. Long recovery VLF perturbations associated with lightning discharges. *Journal of Geophysical Research* 2012; 117:A08311. doi:10.1029/2012JA017567.

Cotts BRT, Gołkowski M, Moore RC. Ionospheric effects of whistler waves from rocket-triggered lightning. *Geophysical Research Letters* 2011; 38:L24805. doi:10.1029/2011GL049869.

Cotts BRT, Inan US, Lehtinen NG. Longitudinal dependence of lightning-induced electron precipitation. *Journal of Geophysical Research* 2011; 116:A10206. doi:10.1029/2011JA016581.

Cotts BRT. Global quantification of lightning-induced electron precipitation using very low frequency remote sensing. Doctoral Dissertation, Stanford University, 2011.

Haldoupis C, Amvrosiadi N, Cotts BRT, Van der Velde O, Chanrion O, Neubert T. More evidence for a one-to-one correlation between Sprites and Early VLF perturbations. *Journal of Geophysical Research* 2010, 115:A07304. doi:10.1029/2009JA015165.

NaitAmor S, Al Abdoadaim MA, Cohen MB, Cotts BRT, Neubeurt T, Soula S, Chanrion O, Abdelatif T. VLF observations of ionospheric disturbances in association with TLEs from the Eurosprite-2007 Campaign, *Journal of Geophysical Research* 2010; 115:A00E47. doi:10.1029/2009JA015026.

Cotts BRT, Inan US. VLF observation of long ionospheric recovery events. *Geophysical Research Letters* 2007; 34:L14809. doi:10.1029/2007GL030094.

## Reports

Snyder DB, Bailey WH, Palmquist K, Cotts BRT, Olsen KR. Evaluation of Potential EMF Effects on Fish Species of Commercial or Recreational Fishing Importance in Southern New England. U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Headquarters, Sterling, VA. OCS Study BOEM 2019-049, August 2019.

Long RT, Blum AF, Bress TJ, Cotts, BRT. Best practices for emergency response to incidents involving electric vehicle battery hazards. Fire Protection Research Foundation Report, 2013.

## Other Publications

Cotts, BRT, Graf KL, Bailey, WH. Electromagnetic Interference Considerations for Electrical Power Systems. Ch. 5 in: *The Power Grid: Smart, Secure, Green, and Reliable*. D'Andrade B (ed). Elsevier Ltd., 2017, 137-170.

Cotts, BRT, Prigmore, JR, Graf KL. HVDC Transmission for Renewable Energy Integration. Ch. 6 in: *The Power Grid: Smart, Secure, Green, and Reliable*. D'Andrade B (ed). Elsevier Ltd., 2017, 171-196.

Pooley M, Cotts B, Brennan, III JF. Compatibility of medical devices with electromagnetic and wireless

signals. North Carolina Associate of Defense Attorneys The Resource; 2017 Sept.

Phan SK, Stepan J, Cotts BRT. Electrical Conductor Spacing Standards for Printed Circuit Boards. Exponent Electrical Engineering and Computer Science Newsletter. Vol. 4, 2016.

Cotts BRT, Inan US, Lehtinen NG. Theoretical prediction of longitudinal dependence of electron precipitation due to lightning. AGU Fall Meeting, San Francisco, CA, December 14-18, 2009.

Inan US, Cotts BRT, Lehtinen NG. Long recovery early/fast events as possible evidence of persistent ionization by Giant Blue Jets. IUGG, Perugia, Italy, July 2-13, 2007.

Cotts BRT, Inan US, Lehtinen NG. Long recovery early/fast events as possible evidence of persistent ionization by Giant Blue Jets. URSI, Ottawa, Canada, July 22-26, 2007.

Cotts BRT, Inan US. Observation of daytime perturbations of VLF transmitter signals. ICAE, Beijing, China, August 13-17, 2007.

Cotts BRT, Inan US. Daytime early VLF perturbations exhibiting long recoveries and wide-angle scattering. AGU, San Francisco, CA, December 10-14, 2007.

Cotts BRT, Inan US. VLF observation of long ionospheric recovery events. AGU, San Francisco, CA, December 11-15, 2006.

Cotts BRT, Inan US, Pasko VP. Ray tracing techniques applied to sky wave observations of lightning-induced ionospheric effects on short range VLF paths. URSI, Boulder, CO, January 5-8, 2005.

Cotts BRT, Inan US. Ray-based modeling of lightning-induced ionospheric effects on short range VLF skywave signals. AGU, San Francisco, CA, December 5-9, 2005.

Cotts BRT, Inan US. Short range VLF sky wave observations of lightning-induced ionospheric effects. AGU, San Francisco, CA, December 13-17, 2004.

Cotts BRT, Inan US, Golkowski M. Lightning-induced electron precipitation measurements with VLF and the Arecibo Radar. PARS Summer School, Arecibo, PR, August 10-21, 2004.

Cotts BRT, Inan US, Selser E. ELF/VLF near-field imaging of modulated auroral-electrojet currents using a VLF interferometer. PARS Summer School, University of Fairbanks Alaska, August 11-21, 2003.

Cotts BRT, Inan US. Precipitation of energetic electrons by Magnetospherically Reecting (MR) Whistlers. AGU, San Francisco, CA, December 8-12, 2003.

## Peer Reviewer

Referee for Journal of Geophysical Research – Space Physics

Referee for Radiation Protection Dosimetry

## AFFIDAVIT OF BENJAMIN R.T. COTTS

I, Benjamin R.T. Cotts, 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.



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Benjamin R.T. Cotts