

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of Medway Grid, LLC, pursuant to G.L. c. 164, § 72 for Approval to Construct a New 345 kV Electric Transmission Line in the Town of Medway, MA)))))	D.P.U. 22-19
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**PETITION OF MEDWAY GRID, LLC PURSUANT TO G.L. c. 164, § 72
FOR APPROVAL OF A NEW 345 kV TRANSMISSION LINE**

I. INTRODUCTION

Medway Grid, LLC (“Medway Grid” or the “Company”) hereby petitions the Department of Public Utilities (the “Department”), pursuant to the provisions of G.L. c. 164, § 72, for approval to construct and operate an approximately 1,325 foot underground 345 kilovolt (“kV”) electric transmission line (the “New Line”) designed to interconnect the proposed 250 MW / 500 MWh standalone battery energy storage system (“BESS”) to Eversource’s existing West Medway Substation (the Eversource Substation”). The New Line, together with the BESS, are referred to herein as the “Project.”

The New Line will serve the public convenience and is consistent with the public interest. In support of this Petition, Medway Grid states as follows:

1. Medway Grid, LLC is a Delaware limited liability company, having a business address of 988 Howard Avenue, Suite 200, Burlingame, CA 94010. Medway Grid, as the project developer of a generation facility in Massachusetts is an entity entitled to petition the Department for authority to construct and use a line for the transmission of electricity under Section 72.

2. Medway Grid is, for the purposes of this Petition, represented by Andrew O. Kaplan, Esquire at the law firm of Pierce Atwood, 100 Summer Street, Boston, MA 02110.
3. The New Line is needed to interconnect the proposed BESS to the grid to ensure adequate capacity is supplied to the Southeast New England (“SENE”) capacity zone effective on June 1, 2024. As such, the new line will serve the public convenience and is in the public interest.
4. Simultaneously herewith, the Company is filing: (a) a petition to the Energy Facilities Siting Board (“EFSB” or the “Siting Board”) requesting approval of the construction of the Project pursuant to G.L. c. 164, § 69J (the “EFSB Petition”); (b) a petition to the Department requesting approval of an individual and comprehensive zoning exemptions from the operation of the Town of Medway Zoning Bylaws, pursuant to G.L. c. 40A, § 3 (the “Zoning Petition”); and (c) a motion with the Department to refer this Section 72 Petition and the Zoning Petition to the Siting Board and to consolidate each of the petitions for review by the Siting Board.
5. Medway Grid respectfully seeks to incorporate its G.L. 164, Section 69J ¼ and G.L. c. 40A petitions, including the Analysis and all exhibits and attachments herein by reference as a part of this Section 72 Petition. The Analysis provides the factual basis for the Company’s conclusion that the Project meets the consistent standards of the Siting Board and Department because the Project is necessary to provide a reliable energy supply for the Commonwealth while minimizing cost and environmental impacts.

6. Section 72 provides that:

Any electric company, distribution company, generation company, or transmission company or any other entity providing or seeking to provide transmission service may petition the department for authority to construct and use . . . 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. . .

G.L. c. 164, § 72.

7. “The Department, in making a determination under G.L. c. 164, § 72, considers all aspects of the public interest.” *NSTAR Elec. Co.*, EFSB 14-2/D.P.U. 14-73/14-74, at 100 (2017) (citing *Boston Edison Co. v. Town of Sudbury*, 356 Mass. 406, 419 (1969)); accord *Russell Biomass, LLC*, EFSB 07-4/D.P.U. 07-35/07-36, at 55 (2009); *Cape Wind Assoc., LLC*, EFSB 02-2A/D.T.E. 02-53, at 20 (2008) and evaluates: (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.” *NSTAR Elec. Co.*, EFSB 14-2/D.P.U. 14-73/14-74, at 100-01; accord *Cape Wind Assoc., LLC*, EFSB 02-2A/D.T.E. 02-53, at 20-21.
8. In assessing the public interest, the Department undertakes “a broad and balanced consideration of all aspects of the general public interest and welfare and not merely [an] examination of the local and individual interests which might be affected.” *New York Central Railroad v. Department of Pub. Utils.*, 347 Mass. 586, 592 (1964).
9. The need for the Project was determined when ISO-NE awarded Medway Grid a capacity contract in the Forward Capacity Auction (“FCA”) 15.

10. As detailed in the EFSB Petition at Section 4, the Company has conducted detailed analyses of the environmental impacts of the Project and has proposed measures to minimize the impacts associated with the construction and operation of the Project. Overall, the Company's analysis demonstrates that the Project will avoid, minimize, and/or mitigate for any potential environmental impacts.
11. As detailed in Section 6 of the EFSB Petition, the Company comprehensively identified and analyzed alternative means to determine a preferred route/design for the New Line. The alternatives considered included (1) no build, (2) an overhead transmission option and (3) an underground option.
12. As required under Section 72, and in support of this Petition, a description of the Project is included in the EFSB Analysis. The Department's Section 72 Checklist is provided as Attachment A to this Petition and a draft hearing notice is being provided along with the EFSB 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 the EFSB Petition at Sections 2 and 3, as well as Attachment A. A list of the permits required for the Project is found in the EFSB Petition at Section 3.5 (Table 3-1). Lastly, a copy of the Company's Expanded Environmental Notification Form (EENF") submitted pursuant to the Massachusetts Environmental Policy Act on January 28, 2022 is included in the EFSB Petition as Attachment D. The Draft Environmental Impact Report has not yet been filed for the Project under MEPA and,

accordingly, no related Certificates or draft MEPA Section 61 findings are yet available.

WHEREFORE, Medway Grid, LLC 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,

Medway Grid, LLC



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Dated: February 25, 2022