

6.2.4 Candidate Site 2 (Eversource Parcels)

Candidate Site 2 is an approximately 11.16-acre site that consists of two parcels of land; one owned by Eversource and the other owned by a private landowner. Figure 6-3a below provides a site locus map for Candidate Site 2. Candidate Site 2 contains a combination of existing electric transmission infrastructure, a private residence and undeveloped forested upland. Access to the Project Site is available from Milford Street. There are existing electric and gas transmission corridors and private residences off Fisher Street and Lantern Lane to the west, the existing West Medway Substation and the Exelon generating station to the south, single family residences and existing electric transmission corridor across Milford Street to the north, and residences and an automotive repair shop along with undeveloped forested uplands and wetlands to the east. Figure 6-3b below shows the existing land uses surrounding this site as well as the environmental features on Candidate Site 2.

Figure 6-3a Candidate Site 2 USGS Locus Map

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Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services

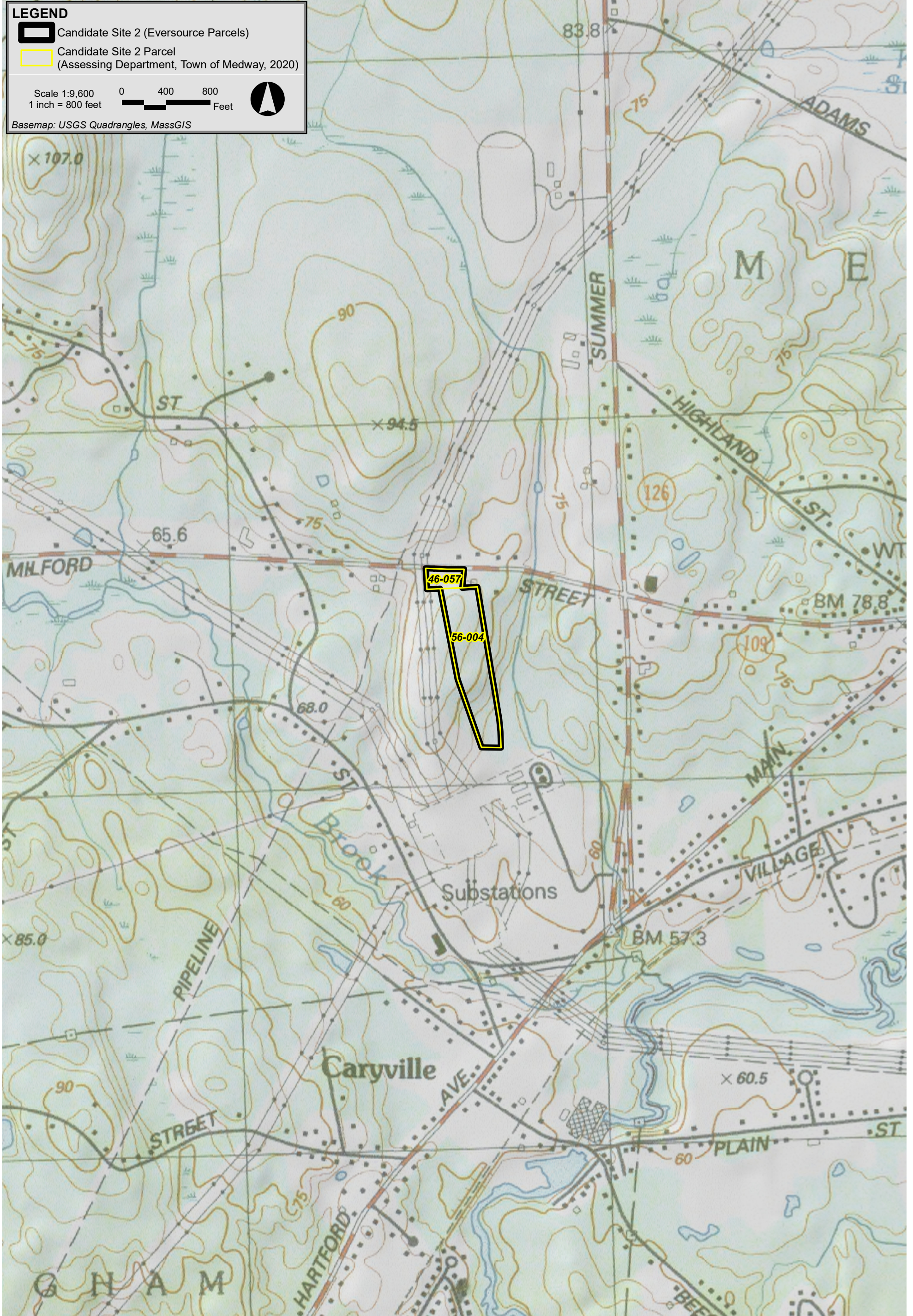
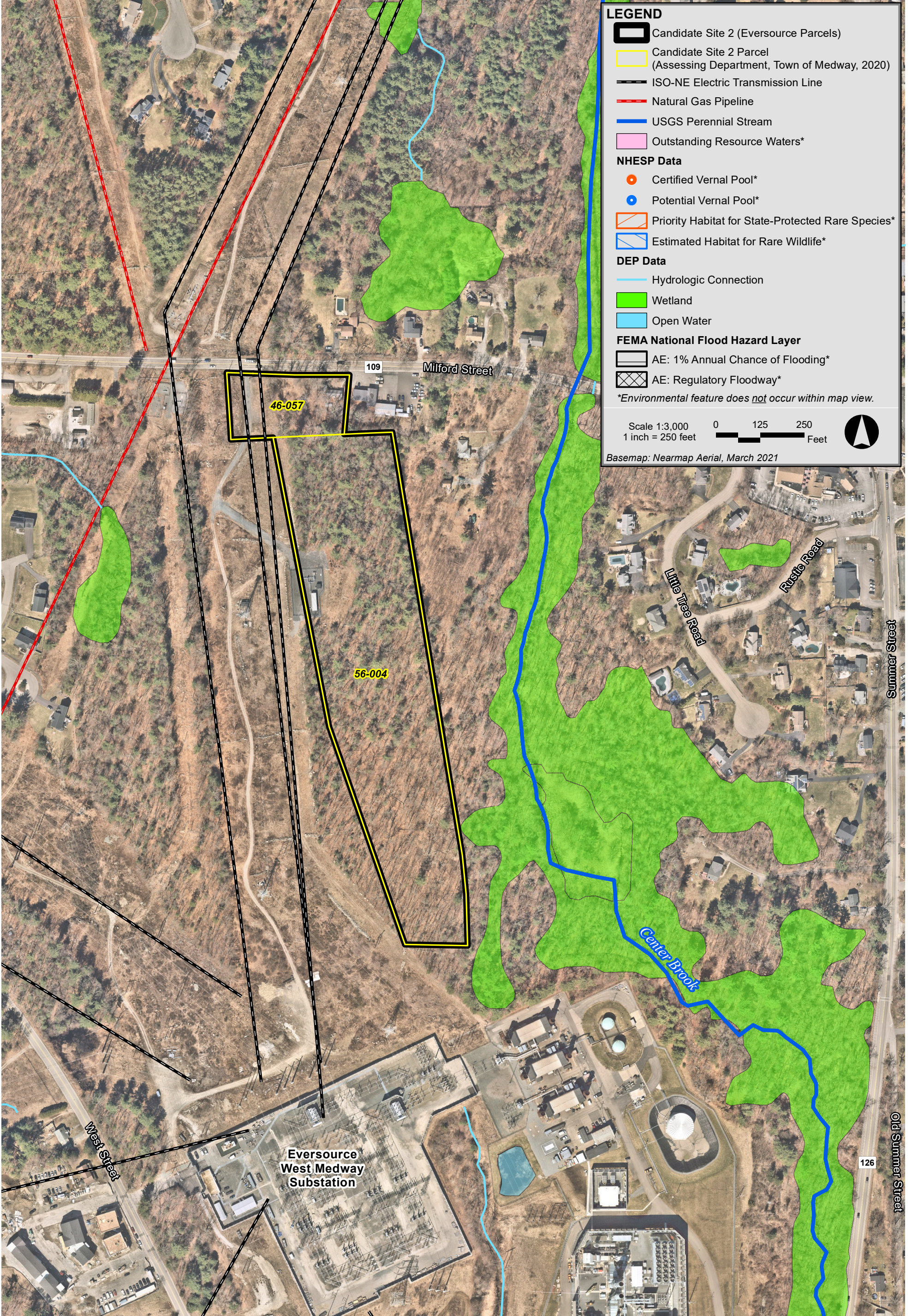


Figure 6-3b Candidate Site 2 Constraints

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Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services



6.2.5 Candidate Site 3 (Southwest Medway Parcels)

Candidate Site 3 is an approximately 36-acre site that consists of multiple existing parcels of land owned by multiple landowners, located along the Medway/Bellingham town boundary and between Tulip Way and Stone End Road. Figure 6-4a below provides a site locus map for Candidate Site 3. Access to the Project Site is potentially available from Tulip Way or Stone End Road, however, the site does not appear to have frontage on Tulip Way, and it is unclear if access could be obtained from this public roadway. Similarly, the parcel does not appear to have frontage from Stone End Road, but there is an existing dirt access road from Stone End to the agricultural operations and the gas pipeline corridor. There are residences off Hixon Street to the north along with an existing electric transmission corridor, a single-family residence off Stone End Road and undeveloped forested land to the east, undeveloped forested and agricultural land to the south along with an existing electric transmission corridor, and residences along Tulip Way and undeveloped forested land to the east. This site is predominantly undeveloped and forested but does have an existing natural gas transmission corridor crossing it and a portion of the site (approximately 3.3 acres) in the southeast corner has been cleared for what appears to be agricultural purposes. There is an extensive wetland system and waterbody in the western portion of this candidate site. Figure 6-4b below shows the existing land uses surrounding this site as well as the environmental features on Candidate Site 3.

Figure 6-4a Candidate Site 3 USGS Locus Map

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Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services

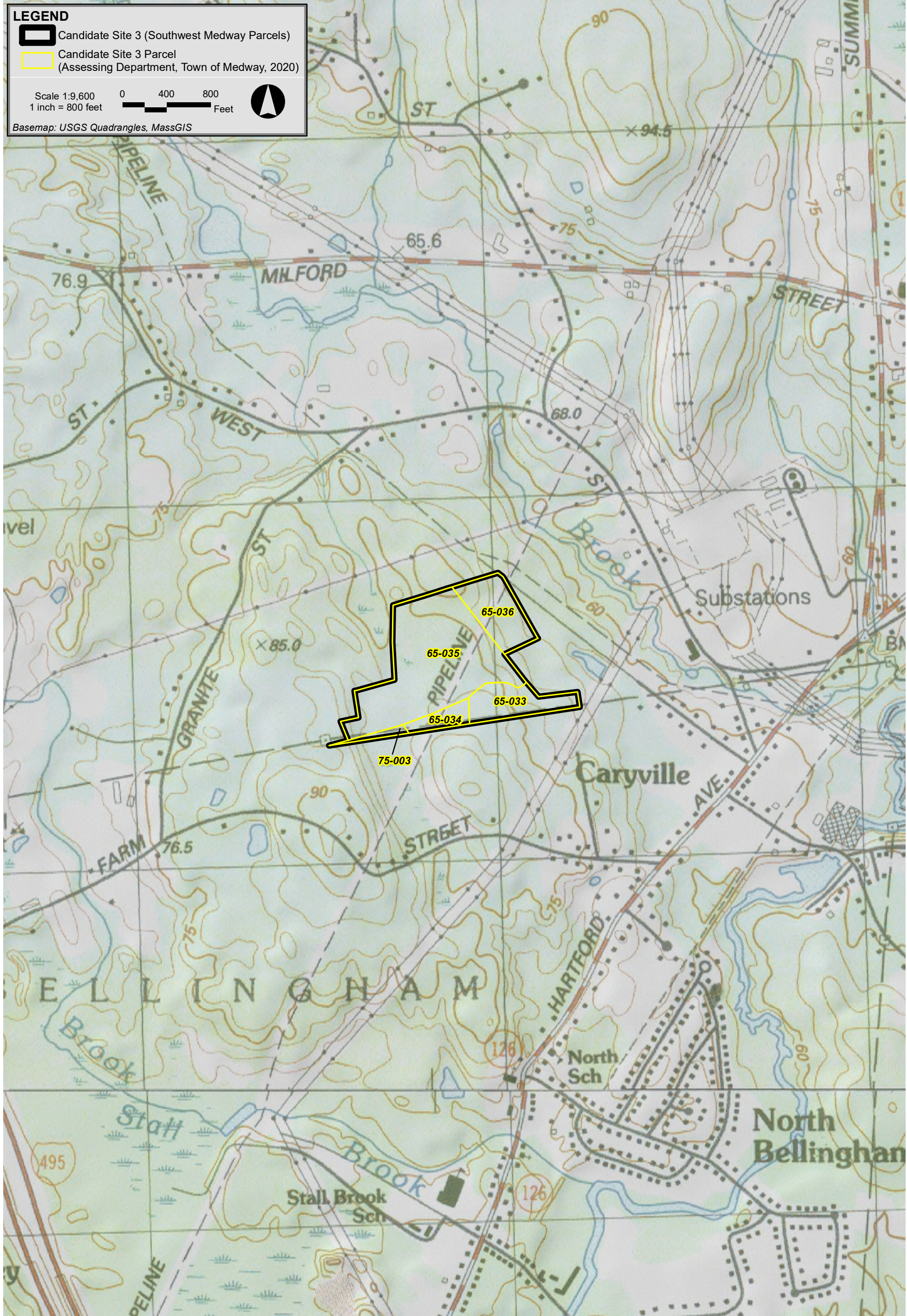
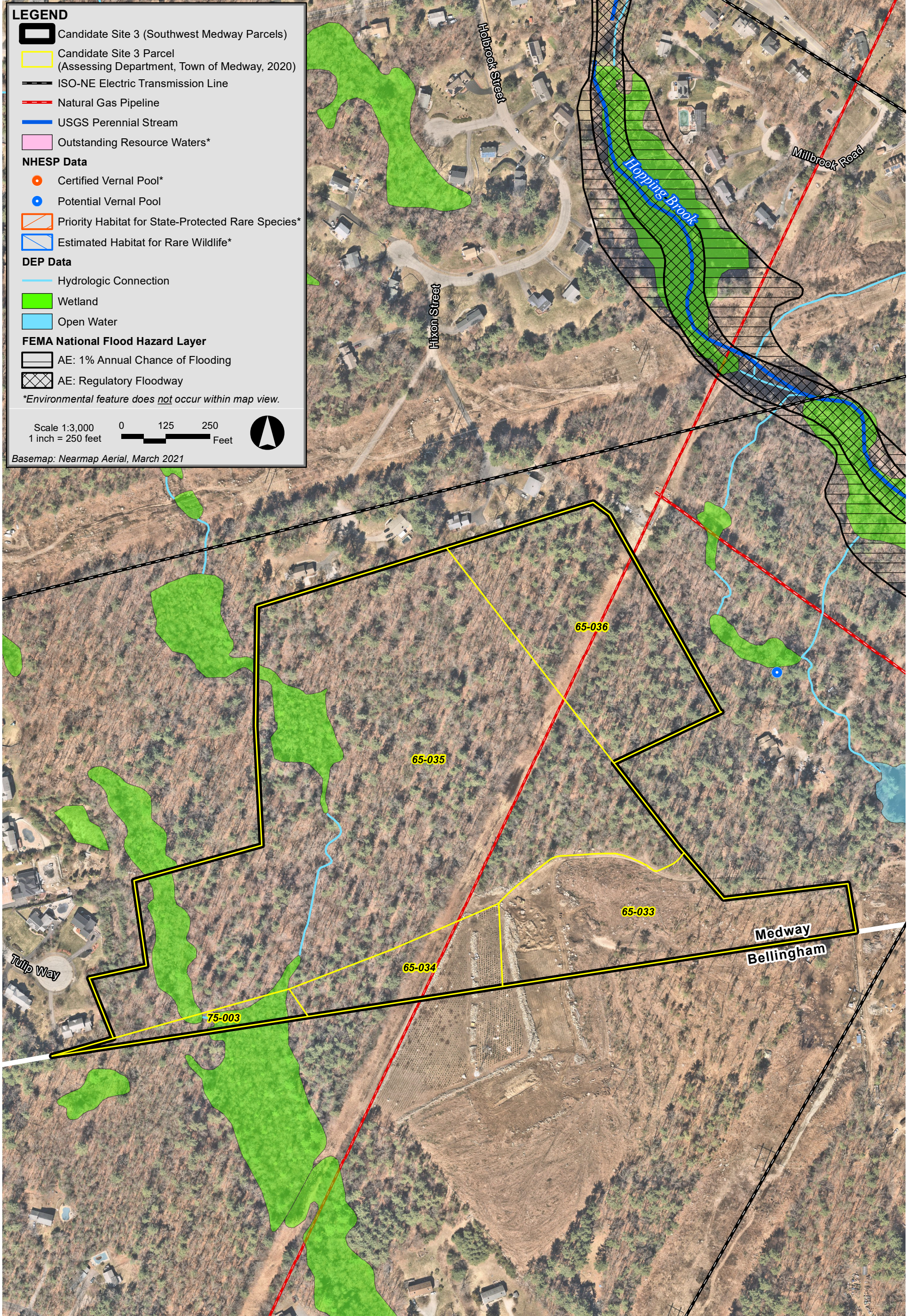


Figure 6-4b Candidate Site 3 Constraints

G:\Projects\2\IMA\Medway\6221\2022\EEN\FMXD\9b_Candidate_Site_3_Constraints_20220112.mxd

Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services



6.3 EVALUATION OF CANDIDATE SITES

Using the considerations set forth in Sections 6.2.1 and 6.2.2, the Company evaluated and compared the three candidate sites.

6.3.1 Candidate Site 1 (Milford Street Parcels)

The location of these parcels within the SENE capacity zone and their proximity to the point of interconnection make them a viable option for the Project, and as compared to the other two Candidate Sites, this site is superior for the following reasons. First, the size of the 4 combined parcels, at approximately 10.6 acres, meets the requisite land area needed for a project of the size proposed. Second, the large size of the combined parcels allows the Project site to be buffered from the nearest residence, avoid direct vegetated wetland impacts, and have minimal, if any, impact on the surrounding residential land uses and natural areas. In addition, these parcels contain previously developed areas associated with an existing automotive repair shop and two existing residences. A proposed project at this location could redevelop these existing disturbed areas, thus reducing the need to clear forested areas and other naturally vegetated areas. Third, the owners of the parcels of land were willing to sell them, and there is sufficient frontage and access along Milford Street. Fourth, the parcels are adjacent to existing electrical transmission and distribution infrastructure with available capacity. Fifth, the location of the Project is in an area where existing electrical infrastructure is currently located and consistent with the current electrical transmission infrastructure use of adjacent land use west and south of the site. All of these criteria enhance the viability of a project of this size and scope at this location and this Candidate Site is superior to the other Candidate Sites considered by the Proponent.

6.3.2 Candidate Site 2 (Eversource Parcels)

The location of these parcels within the SENE capacity zone and their proximity to the point of interconnection made them attractive, however, as compared to the other two candidate sites, this site is inferior to Candidate Site 1, but superior to Candidate Site 3 for the following

reasons: development would be primarily within the existing undeveloped and forested portions of the site requiring significant tree removal and was not available for lease or purchase. For these reasons, the Company did not further consider Candidate Site 2 for development.

6.3.3 Candidate Site 3 (Southwest Medway Parcels)

The location of these parcels within the SENE capacity zone and their proximity to the point of interconnection made them attractive, however, this site is inferior to the other two candidate sites for the following reasons. First, the parcel does not have access from a public roadway. Further, if access could be obtained from Tulip Way, it would be necessary to cross a forested wetland to gain access to upland areas on the interior of the parcel. Similarly, the parcel does not have frontage along Stone End Road, and it appears that it would be necessary to obtain rights from or purchase additional privately held land to gain access to the parcel from this public roadway. Second, a project on this site would require the clearing of existing undeveloped and forested areas or the use of existing agricultural lands to accommodate the project footprint and utility interconnection. As such, development of the Project at this site would result in greater impacts to undeveloped forested lands and existing agricultural land than the other alternatives considered. If access from either of these public roadways could be obtained, the access to the site would be through existing residential neighborhoods. Third, the site would require the project's transmission interconnection route to be approximately twice as long (3,000 feet) as the two other Candidate Sites.

6.4 NO BUILD ALTERNATIVE

Under the No-Build Alternative, the Project would not be constructed, and the Commonwealth would not meet its need for adequate capacity in the SENE capacity zone. ISO-NE procures capacity based upon its load forecasts for different capacity zones. The Project was awarded a capacity contract via the Forward Capacity Auction ("FCA") 15, based upon its ability to provide this needed capacity by June 1, 2024.

6.5 CONCLUSION

In summary, Candidate Site 1 (Milford Street Parcels) was selected as the Preferred Site for the Project because of its proximity to the interconnection point to the existing 345 kV transmission system at the West Medway Substation, existing access from a major arterial roadway, ability to secure the parcels, ability to avoid and minimize wetland resource area impacts and comply with regulatory performance standards, and ability to take advantage of existing developed areas on the site parcels.

6.6 TRANSMISSION INTERCONNECTION ALTERNATIVES CONSIDERED

The Company evaluated both an underground and an overhead transmission corridor option from the existing Project Substation to the West Medway Substation. As per coordination with Eversource on this alignment across their property, an overhead transmission interconnection would be approximately 1,800 feet long and require clearing of a corridor of approximately 100 feet in width. The transmission line would be supported on eight (8) steel lattice structures approximately 120 feet tall. The overhead transmission option would result in approximately 4.13 acres of land alteration and located within the 100-foot buffer zone to BVW. Instead, the Company proposes to construct an underground transmission line that will be 1,325 feet long and require clearing of a corridor of approximately 25 feet in width. In total, approximately 0.76 acres of land alteration would be required with this design alternative, substantially less when compared to the overhead transmission line design. Moreover, the underground transmission line would be located entirely outside of regulated wetland areas including the 100-foot buffer zone to BVW and RFA.

SECTION 7.0 COMMUNITY OUTREACH

7.1 INTRODUCTION

Medway Grid commits to continuing to work with federal, state, and municipal officials, businesses, and residents in the vicinity of the Project and to provide proactive and transparent communications throughout the life of the Project. Medway Grid's extensive outreach efforts have been aimed at briefing all stakeholders on the need for the Project, consulting with stakeholders on the Project components and design, delineating the projected Project schedule, and explaining the permitting and siting processes, including opportunities for public input. Medway Grid will continue outreach efforts during the licensing and permitting process and will take a hands-on, individualized approach to community outreach during the construction and operations phases of the Project.

Key elements of the Company's outreach program are described below.

7.1.1 Website

The Applicant established a Project website in order to provide basic Project information, answers to frequently asked questions, and contact resources; the website will be kept up to date throughout the duration of Project development.

7.1.2 Project E-mail

The Applicant established a dedicated e-mail address to communicate with property owners and other stakeholders regarding the Project. This email address is listed in all Project outreach materials, including mailings, flyers handed out door-to-door, the website, and community events.

7.1.3 Phone Number

In going door-to-door to talk to nearby residents in support of pre-construction outreach efforts, the Project Team provided their cell phone numbers and invited abutters to reach out with any questions or concerns. The Project Team has corresponded directly with many residents, and they have been encouraged to email or phone directly, at any time.

During construction the Project intends to setup a dedicated Project Hotline number that will be monitored real-time in order to promptly respond to questions or concerns. This number will be promoted on all outreach materials including fact sheets, construction update notifications and the Project website.

7.1.4 Construction Community Outreach Plan

Medway Grid will execute a comprehensive community outreach plan to keep property owners, businesses, and municipal officials, including fire, police, and emergency personnel, up to date on planned construction activities. Prior to the start of construction, dedicated field outreach personnel will notify municipal officials and perform door-to-door outreach to inform abutting property owners, residents, and businesses of planned construction start and work schedule. The Company will provide regular communications and work closely with both abutters and municipal officials to minimize construction impacts throughout the construction duration. The outreach plan will also include:

- In-person pre-construction briefings with municipalities, abutting residences and businesses, and other stakeholder groups, as requested, to outline the overall construction process, key milestones, and expected timelines;
- Regular e-mail updates to municipal officials;
- Periodic letters or postcards to abutters and other stakeholders regarding advance notice of scheduled construction activities, large deliveries and/or milestone construction activities;
- Work area signage as appropriate; and
- Outreach staff available to meet with nearby property owners prior to each major stage of construction.

7.1.5 Open House

Medway Grid hosted a virtual Open House to provide the public with the opportunity to interact with Project subject matter experts, ask questions, and share concerns. At the Open House, the Company provided information on the need for and benefits of the Project, described the Project siting process, explained the components of an energy storage project, discussed safety test

results and emergency response operations protocols, and provided detail on Project design and location and schedule. The Open House was held via Zoom on June 23, 2021, at 7pm.

Medway Grid mailed invitations to approximately 128 property owners within one-quarter mile of the proposed project, identified through a Town-certified list. Medway Grid also notified Town Staff and elected officials of the meeting, resulting in both the Town and elected officials promoting the event on their social media channels (Facebook and Twitter) as well as other targeted social media including Friends of Medway.

The Project Outreach staff also canvassed door-to-door in advance of the Open House to encourage residents to attend. A copy of the invitation that also included a QR code to scan to join the meeting was provided.

For those individuals who were interested in viewing the Open House but could not attend, the Project Team coordinated for the recording of the event to run several times on Medway Cable Access Television and for the recording to be hosted on their [website](#) so that it is available for livestreaming.

7.1.6 Contractor Training

In advance of construction, the Outreach Team will assist with performing contractor training. This training is to stress the importance of contractors working responsibly and respectfully in the community and adhering to commitments and permitted work hours established with the Town.

7.1.7 Municipal and Stakeholder Briefings

Medway Grid has met frequently with municipal officials and other stakeholders in the Town. A summary list of many of the outreach meetings with the municipalities, special interest groups, regulatory agencies and other officials is provided in Table 1-1.

Table 1-1: Project Outreach Meetings

Date	Group	Topic
December 16, 2021	Medway Staff	Meeting to present project plans to Medway Town Staff, seek input, answer questions
July 23, 2021	Medway Consultant	Meeting to discuss project plan, RFI, and related questions
July 21, 2021 In-Person	Medway Staff	Meeting to discuss EFSB process & schedule; discuss timing to receive input from Town Departments
June 23, 2021 Via Zoom	Medway Residents, Abutters, Elected Officials	Project Open House / Q&A with subject matter experts from Medway Grid Team
June 3, 2021 In-Person	Medway Staff	Meeting to discuss possible local land use permitting paths, save-the-date for upcoming Open House
May 24, 2021 Via Teams	Medway Fire Chief Lynch, Deputy Chief Fasolino	Introductory meeting to discuss Project design, safety protocols, emergency response protocols
May 12, 2021 Via Teams	Medway Staff	Meeting to discuss project plan and related questions
May 5, 2021 Via Zoom	Medway Residents, Elected Officials, Greater Community	Battery Storage 101, Hosted by Representative Jeff Roy Informational Session on Energy Storage
April 2, 2021 Via Teams	Medway Staff & 1-2 Elected Officials	Meeting to discuss upcoming Town Meeting, local planning & zoning process
March 31, 2021 Via Zoom	Medway Energy & Sustainability Committee & Medway Residents	Attend meeting to talk with Committee & public about proposed Project and answer questions
March 30, 2021 Via Zoom	Medway Planning & Economic Development Board & Medway Residents	Attend meeting to talk with Board & public about proposed project and answer questions
March 23, 2021 Via Zoom	Medway Planning & Economic Development Board & Medway Residents	Attend meeting to talk with Board & public about proposed project and answer questions
March 15, 2021 Via Zoom	Medway Select Board & Medway Residents	Attend meeting to talk with Board & public about proposed project and answer questions
March 9, 2021 Via Zoom	Medway Planning & Economic Development Board & Medway Residents	Attend meeting to talk with Board & public about proposed project and answer questions
February 5, 2021 Via Teams	Medway Staff	Meeting to discuss proposed Project and potential for local permitting path
December 17, 2019 In-Person	Medway Staff, Department Heads	Meeting to discuss project concept, project location, intention to bid project to FCA
September 30, 2019 Telephone	Medway Staff	Meeting to introduce project concept, project location, possible approaches to local permitting/zoning
September 23, 2019 In-Person	Medway Staff	Meeting to introduce project concept, project location, possible approaches to local permitting/zoning
December 16, 2021	Medway Staff, Department Heads	Meeting to review the final project layout and details prior to MEPA and EFSB filings.

8.1 CONSISTENCY WITH POLICIES OF THE COMMONWEALTH

The Project, if approved, would contribute 500 MWh of energy storage toward the goals delineated by the Commonwealth of Massachusetts in its *State of Charge* report and other initiatives and mandates. As discussed below, it is designed to enhance the efficiency, affordability, resiliency, and cleanliness of the electric grid by modernizing the way that electricity is generated and delivered.

8.2 GLOBAL WARMING SOLUTIONS ACT

The Global Warming Solutions Act (“GWSA”) required a 25% reduction in greenhouse gas (“GHG”) emissions from all sectors of the economy below the 1990 baseline emission level by 2020, and mandates at least an 80% reduction by 2050. The Executive Office of Energy and Environmental Affairs is working toward the development of the Massachusetts Decarbonization Roadmap to 2050 that will identify “strategies, policies, and implementation pathways for MA to achieve at least 80% GHG reductions by 2050, including multiple pathways to near zero emissions. On January 21, 2020, Governor Baker announced the Commonwealth’s intent to pursue the more aggressive near zero target to further reduce emissions.

The GWSA requires that the Secretary of Energy and Environmental Affairs, in consultation with the MassDEP and DOER, adopt separate statewide GHG emissions limits for 2020, 2030, 2040, and 2050. On April 22, 2020, the Secretary established a 2050 statewide emissions limit of near zero greenhouse gas emissions defined as follows:

A level of statewide greenhouse gas emissions that is equal in quantity to the amount of carbon dioxide or its equivalent that is removed from the atmosphere and stored annually by, or attributable to, the Commonwealth; provided, however, that in no event shall the level of emissions be greater than a level that is 85 percent below the 1990 level.

Approval of the Project would contribute to the Commonwealth's achievement of important health, environmental, and energy policies, including meeting the Commonwealth's 2050 near zero emissions goal under the GWSA. Battery storage facilities increase the energy efficiency of the electric grid with minimal environmental impacts. As described throughout this Petition, there is no waste produced by energy storage systems and no fuels emitted by the BESS. Furthermore, the system increases grid reliability during peak load times, and can perform other grid services, thereby offsetting the need for additional fossil-fuel fired peaking units, further reducing greenhouse gas emissions and limiting the environmental impacts of such projects.

8.3 ENERGY STORAGE INITIATIVE

The Project is consistent with the Energy Storage Initiative. As noted above, the Baker Administration launched the Energy Storage Initiative in May 2015 with the goal of advancing the energy storage segment of the Massachusetts clean energy industry by: (1) attracting, supporting and promoting storage companies in Massachusetts; (2) accelerating the development of early commercial storage technologies; (3) expanding markets for storage technologies, and valuing storage benefits to clean energy integration, grid reliability, system wide efficiency, and peak demand reduction; and (4) recommending the developing policies, regulations and programs that help achieve those objectives.

As part of the 2015 Energy Storage Initiative, the Department of Energy Resources ("DOER") and Massachusetts Clean Energy Center partnered to conduct a study, the *State of Charge*, to review the storage industry landscape, review economic development and market opportunities for energy storage, and evaluate potential policies and programs to support energy storage development in Massachusetts. DOER has implemented many of the 2016 *State of Charge* report's recommendations to promote energy storage in the state.

The *State of Charge* report identified ratepayer cost benefits of energy storage associated with "reduced peak demand, deferred transmission and distribution investments,

reduced GHG emissions, reduced cost of renewables integration, deferred new capacity investments, and increased grid flexibility, reliability and resiliency.”⁸ The report also identified near and long term economic and workforce benefits to Massachusetts by implementing energy storage.

8.4 CLEAN PEAK STANDARD

The Project is consistent with the Massachusetts Clean Peak Standard (“CPS”). The CPS is “designed to provide incentives to clean energy technologies that can supply electricity or reduce demand during seasonal peak demand periods established by DOER” (see Attachments 2 and 3). According to DOER, Clean Peak Resources contribute to the Commonwealth’s environmental protection goals concerning air emissions, including those required by the Global Warming Solutions Act (“GWSA”), discussed below, by displacing non-renewable generating resources while reducing peak demand and system losses and increasing grid reliability.

Similar to the Massachusetts Renewable Portfolio Standard, the CPS requires a percentage of electricity delivered during peak hours to come from certain eligible Clean Peak Sources. Clean Peak Sources include Qualified RPS Resources, Qualified Energy Storage Systems, or Demand Response Resources that generate, dispatch, or discharge electricity into the electric distribution system during certain peak periods, or alternatively, reduce load on the system during those periods.

The Project is uniquely positioned to satisfy the CPS. One of the many benefits of the Project is that it is “fully dispatchable,” capable of providing an energy source directly to the transmission system during peak load and can store electricity during off peak periods, whereas intermittent renewables and renewable-storage hybrid projects are unable to fully produce on demand and are limited in their charge and discharge by implementation rules of the federal

⁸ *Id.*

Investment Tax Credit that they use in financing. Moreover, fully dispatchable BESS installations like the Project can perform additional grid services that are currently provided by traditional power plants. Standalone BESS like the Project are thus the ideal clean facilities to achieve the objectives of the CPS because they displace non-renewable generating sources, thereby reducing air emissions, while reducing peak demand and increasing reliability.

8.5 ENVIRONMENTAL JUSTICE POLICY

There are no mapped Environmental Justice (“EJ”) populations within 1 mile of the proposed Project. There are several mapped areas of EJ populations on the west side of Route 495 in Milford, Massachusetts and along Union Street in Franklin, Massachusetts that are within 5 miles of the proposed Project, however, the Project does not impact air quality or have other environmental impacts that would disproportionately affect these populations. The Project does not qualify for MEPA’s enhanced public involvement protocols or enhanced analysis of potential project impacts on environmental justice populations. The closest mapped EJ population is on the west side of Route 495 in Milford and is approximately 2.25 miles from the Project Site.