

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

<p>Petition of Medway Grid, LLC) Pursuant to G.L. c. 164, § 69J ¼ for Approval to) Construct a 250 MW Battery) Energy Storage System in Medway, MA)</p>	EFSB 22-02
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**PETITION OF MEDWAY GRID, LLC
FOR APPROVAL TO CONSTRUCT A 250 MW BATTERY ENERGY STORAGE PROJECT**

NOW COMES Medway Grid, LLC (“Medway Grid”, the “Company” or the “Applicant”), pursuant to G.L. c. 164, § 69J ¼, seeking approval from the Energy Facilities Siting Board (the “Siting Board” or “EFSB”) to construct a 250 megawatt (“MW”)/500 megawatt-hour (“MWh”) standalone battery energy storage system (“BESS”), including a new electric substation, on approximately 10.6 acres of land to be located in the Town of Medway (the “Town” or “Medway”) (the “Medway Grid Energy Storage Project” or the “Project”).

G.L. c. 164, § 69J ¼ states that the Siting Board shall approve construction of a generating facility where the applicant has demonstrated that: (i) the description of the proposed generating facility and its environmental impacts are substantially accurate and complete; (ii) the description of the site selection process used is accurate; (iii) the plans for the construction of the proposed generating facility are consistent with current health and environmental protection policies of the Commonwealth and with such energy policies as are adopted by the Commonwealth for the specific purpose of guiding the decisions of the Board; (iv) such plans minimize the environmental impacts consistent with the minimization of costs associated with the mitigation, control, and reduction of the environmental impacts of the proposed generating facility; and (v) the construction of the proposed zero greenhouse gas emission-generating facility contributes to a clean regional energy supply with minimal environmental impacts.

As demonstrated herein, the Project is located in an area that allows for interconnection adjacent to an existing NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) substation, is consistent with current health, safety and environmental regulations and policies, and is designed to avoid, minimize, and/or mitigate for environmental impacts. As such, the Project is consistent with the requirements for approval of the Project under the Siting Board requirements.

In support of the Application, the Company states as follows:

1. The Siting Board Has Jurisdiction over the Proposed Project

The Siting Board has jurisdiction to review and approve “generating facilities” pursuant to G.L. c. 164, § 69J ¼, defined as “any generating unit designed for or capable of operating at a gross capacity of 100 MW or more, including associated buildings, ancillary structures, transmission and pipeline interconnections that are not otherwise facilities, and fuel storage facilities.” The Project is a standalone energy storage system, in that it is not designed as a co-located or a hybrid installation with renewable energy generation onsite. The Project proposes to: (1) have a nameplate capacity of 250 MW; (2) be connected to the ISO-NE administered transmission system and (3) has successfully participated in the ISO-NE wholesale market and the ISO-NE Forward Capacity Market (“FCM”).

While the Siting Board’s statutes and regulations do not explicitly define what constitutes a “generating unit,” “generation,” or a “generating facility”, the Siting Board has, in the past, looked to definitions in Section 1 of Chapter 164 when a particular term is not defined in G.L. c. 164 § 69G. Chapter 164 defines generation as “the act or process of transforming other forms of energy into electric energy or the amount of electric energy so produced.” Relatedly, a “generation facility” is defined as a “plant or equipment used to produce, manufacture or otherwise generate electricity and which is not a transmission facility, or an energy storage system procured by a distribution company for

support in delivering energy services to end users.”¹ Medway Grid meets these definitions. Medway Grid is a BESS, which is defined as “a commercially available technology that is capable of absorbing energy, storing it for a period of time and thereafter dispatching the energy.”² Medway Grid was not procured by a distribution company for support in delivering energy services to end users. Rather, Medway Grid is a BESS that can participate in the ISO-NE marketplace as a Generator Asset, which is defined in the ISO-NE Tariff as a “device (or a collection of devices) that is capable of injecting real power onto the grid.”³ Because Medway Grid will function as a generator, it is a “generating facility” subject to Siting Board review.

Medway Grid has been designed to participate in ISO-NE’s Forward Capacity Market (“FCM”) and will contribute 250 MW of capacity within ISO-NE’s SENE capacity zone. The Project, located in ISO-NE’s Southeast Massachusetts (“SEMA”) load zone, may also participate in the Day-Ahead and Real-Time energy markets as well as ISO-NE’s ancillary services markets where products such as frequency response, regulation, and reserves maintain system reliability. From a wholesale electricity market standpoint, the Project will operate much like a generator in that it will act as a source of wholesale electricity and provide wholesale services in the same manner as other resources, *i.e.*, by dispatching electricity into the marketplace.

Essentially, under ISO New England’s market rules, a BESS acts as and is modeled a generator when dispatching electricity into the marketplace.

The size of the Project, at 250 MW, exceeds the Siting Board’s 100 MW jurisdictional threshold. Moreover, given Medway Grid’s intended participation in the wholesale electricity markets and ISO-NE’s characterization of storage facilities as Generator

¹ G.L. c. 164 § 1.

² *Id.*

³ ISO-NE Tariff § “Generator Asset.”

Assets under the market rules, this Project qualifies as a “generating unit” or a “generating facility,” and its operation should be considered to be “generation” over which the Siting Board’s exercise of jurisdiction is appropriate.

2. ISO-NE has Awarded a Capacity Contract for the Project

ISO-New England, Inc. (“ISO-NE”) procures electric capacity for various capacity zones in New England, based upon its load forecasts for these different zones. The Project was awarded a capacity contract in the Southeastern New England (“SENE”) capacity zone, via the Forward Capacity Auction (“FCA”) 15, based upon its ability to provide this needed capacity by June 1, 2024.

3. Project Has Minimal Environmental Impacts

The Project has fewer environmental considerations and impacts for EFSB review than traditional generation projects. Regardless, the Project has been sited and designed to avoid and/or minimize impacts to environmental resources and provides sufficient mitigation for any unavoidable environmental impacts. In summary, the Project will generate zero air emissions, will not directly impact water resources, will not directly impact rare species, will not interfere with any existing agricultural uses, and is not anticipated to have an adverse effect on any existing sensitive cultural resources. The Project has been sited to avoid impacts to vegetated wetland areas and designed to comply with all applicable state and local regulatory performance standards related to other wetland resources (i.e., Riverfront Area). The stormwater management design for the Project will meet the Massachusetts Stormwater Policy recommendations, and the Project will fully comply with MassDEP Stormwater Standards. Noise mitigation measures have been incorporated into the design of the proposed facility to minimize the potential for operational noise to impact the surrounding public. Traffic impacts due to initial construction of the Project and occasional on-site maintenance visits during operations will all be minimal.

4. The Project Site Selection is Preferred

The Project Site, presented herein, was selected as the Preferred Site over two other potential candidate sites due to 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 of the Proponent 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.

5. Consistency with Massachusetts Energy Policies and Initiatives

The Commonwealth has set forth goals to achieve 1000MWh of battery storage by 2025. This Project would provide 500MWh towards that goal.

WHEREFORE, Medway Grid, LLC respectfully requests that the Energy Facilities Siting Board approve this Application.

Respectfully submitted,

Medway Grid, LLC

By its attorney,



Andrew O. Kaplan
Pierce Atwood LLP
100 Summer Street
Boston, Massachusetts 02110

Dated: February 25, 2022

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

**Petition of Medway Grid, LLC for Approval to Construct a 250 MW Battery Energy
Storage Facility in Medway, MA
Docket No. EFSB 22-02**

**Submitted by:
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February 25, 2022

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Attachments

Attachment A:	Project Plans
Attachment B:	Stormwater Management Report
Attachment C:	Sound Level Assessment Report
Attachment D:	Expanded Environmental Notification Form
Attachment E:	Electric and Magnetic Fields Assessment Report
Attachment F:	Agency Correspondence
Attachment G:	Draft Emergency Response and Operations Plan

Exhibits

Exhibit MG-CW-1	Testimony of Christina Wolf
Exhibit MG-JA-1	Testimony of Justin Adams
Exhibit MG-MB-1	Testimony of Marc Bergeron
Exhibit MG-AJJ-1	Testimony of AJ Jablonowski
Exhibit MG-RO-1	Testimony of Robert O'Neal
Exhibit MG-BC-1	Testimony of Benjamin Cotts
Exhibit MG-JK-1	Testimony of Jason Knedlhans

SECTION 1.0 THE PROJECT

1.1 PROJECT OVERVIEW

Medway Grid, LLC (the “Company” or the “Applicant” or “Medway Grid” is proposing to construct a 250 MW/500 MWh battery energy storage system and an ancillary new electric substation (“the Project Substation”), to be located on the south side of Milford Street (Route 109) in the Town of Medway, Massachusetts (“the Project Site”). As part of the Project, the Company is also proposing to construct a new 345kV underground transmission line interconnection (“the Proposed Transmission Interconnection”) from the proposed Project Substation to Eversource Energy’s existing West Medway Substation (“the Eversource Substation”), a distance of approximately 1,325 linear feet. The Project also includes some upgrades to Eversource facilities to enable the interconnection; these will be undertaken by Eversource and are described in more detail below. The Project is designed to utilize lithium-ion batteries, which will be housed in approximately 140 above-ground enclosures. The Project Site is approximately 10.6 acres in size and contains approximately 0.85 acres of previously developed areas associated with three existing residences and an existing automotive repair facility. Of the 10.6-acre Project Site, approximately 5.2 acres will be developed for the BESS and the ancillary Project Substation.⁴

The Project was awarded a capacity contract in the Southeastern New England (“SENE”) capacity zone, via the Forward Capacity Auction (“FCA”) 15, based upon its ability to provide this needed capacity by June 1, 2024. In general, the Project will store electricity, during times of oversupply, and dispatch the electricity, during times of peak demand onto the electric grid. More specifically, charging and discharging will be dictated by directives of the

⁴ On this date, Medway Grid submitted with the Department of Public Utilities, (1) pursuant to G.L. c. 40A, a motion for an individual and comprehensive zoning exemption, and (2) G.L. c. 164 § 72, a motion for approval of a new 345 kV transmission line. Concomitantly, the Company has submitted a motion to consolidate both those dockets into EFSB 22-X for evaluation by the Siting Board in the instant docket. Moreover, the Company has incorporated by reference into both the 40A, and Section 72 petitions all information contained in this EFSB Petition, including the Analysis and Attachments

Clean Peak Program, requirements of the capacity contract, and overall energy market needs. In addition, the Project is being proposed in furtherance of the Commonwealth of Massachusetts goals to achieve 1000MWh of battery storage by 2025. This Project would provide 500 MWh towards that goal.

The proposed Project Substation is an ancillary structure to the BESS and will be located entirely on the Project Site. The function of this substation is to take the routed power output from the BESS to a 34.5kV collection switchgear and step it up to a transmission voltage of 345kV to allow the power from the BESS to be connected to the Eversource Substation via the proposed Transmission Interconnection. The Proposed Transmission Interconnection will run south and west, from the Project Site, crossing two Eversource-controlled parcels to connect to the existing Eversource Substation. The proposed underground transmission line will require the clearing of vegetation up to 25-feet-wide along its 1,325-foot corridor. An approximately 12-foot-wide gravel roadway will be installed over the underground transmission line within this 25-foot-wide corridor to provide permanent access to the Transmission Interconnection.

The BESS will be surrounded by a combination of a minimum 8-foot-high security fence in certain sections and a 22-foot-high sound attenuation barrier wall. The sound attenuation barrier is approximately 1,280 feet in length, located along the north and east sides of the BESS. Access gates will be locked at all times and only accessible by qualified personnel.

1.2. HOW THE PETITION IS STRUCTURED

There are eight sections that make up the Company's Siting Board application including the Project Overview. Collectively, they demonstrate that Medway Grid, LLC's proposed Project meets or exceeds the statutory requirements, pursuant to G.L. c. 164 § 69J ¼. As detailed herein, testimony as to the overview of the Project will be offered by Christina Wolf, the Development Lead for the Project. Ms. Wolf's testimony is attached hereto as Exhibit MG-CW.

Section 2 provides details about the Project's site and Section 3 details the Project components, as well as the proposed permitting and construction schedule. Testimony on these sections will be offered by Justin Adams, Director of Permitting and Marc Bergeron, Principal of Epsilon Associates, Inc. Messrs. Adams' and Bergeron's testimony is attached hereto as Exhibits MG-JA and MG-MB, respectively.

Section 4 presents the environmental assessment completed by the Company to demonstrate that the Project will have minimal impact on the surrounding built and natural environment, including, but not limited to; air quality/emissions, water resources/supply, wetlands, stormwater management, solid and hazardous waste, noise, traffic, electric and magnetic fields ("EMF"), and visual. Marc Bergeron, AJ Jablonowski and Robert O'Neil, both principals will Epsilon Associates and Ben Cotts, with Exponent, will testify on these matters. Messrs. Jablonowski's, O'Neil's and Cotts' testimony is attached hereto as Exhibits MG-AJJ, MG-RO and MG-BC, respectively.

Section 5 describes the safety testing, evaluations, analyses, and planning that the Company has undertaken to ensure that the Project is constructed and operated in a safe and secure manner. Testimony on the Project's safety will be offered by Jason Knedlhans. Mr. Knedlhans testimony is attached hereto as Exhibit MG-JK.

Section 6 details the Site Selection process, including information about alternative sites that were considered, but for a variety of reasons, ultimately not chosen. Ms. Wolf and Mr. Adams will sponsor this section.

Section 7 outlines the Company's outreach to provide information about the Project to the community. This Section is sponsored by Ms. Wolf's testimony.

Section 8 provides information about the Commonwealth's policies designed to promote energy storage and how this Project will help propel the Commonwealth in meeting those policy goals. This Section is sponsored by the testimony of Ms. Wolf.

1.3 PROJECT TEAM

The Company has assembled a capable and highly experienced team of project planners, engineers, environmental scientists, attorneys, and outreach specialists for the Project. The team's principal organizations are described below.

1.3.1 Epsilon Associates, Inc.

Epsilon Associates, Inc. ("Epsilon") is an approximately 60-person engineering and environmental consulting firm based in Maynard, Massachusetts. Epsilon's engineers, scientists, planners, and regulatory specialists are engaged in environmental analyses, modeling, licensing, and permitting for energy infrastructure projects throughout the northeast. Epsilon conducted the noise analysis and the assessment of environmental impacts for the Project and is providing local, state, and federal environmental permitting support.

1.3.2 Exponent, Inc.

Exponent Inc. ("Exponent"), with an office located in Natick, Massachusetts, is a multidisciplinary organization of scientists, physicians, engineers, and business consultants that performs in-depth investigations including evaluation of complex human health and environmental issues. Exponent conducted assessments of electric and magnetic fields ("EMF") and applicable safety-related topics for the Project.

1.3.3 Commonwealth Heritage Group, Inc.

Commonwealth Heritage Group, Inc. ("CHG") is a full-service heritage management and consulting firm headquartered in Michigan, with a local office in Littleton, Massachusetts. CHG conducted cultural resource assessment for the Project and is providing the necessary permitting support related to cultural resources.

1.3.4 Pierce Atwood LLP

Pierce Atwood LLP is a full-service law firm, representing a broad range of utilities, developers, and other stakeholders before federal and state agencies. Pierce Atwood clients include energy storage developers, solar, wind and biomass companies, developers of natural

gas-fired generation facilities, electric and natural gas utilities, hospitals, global governmental agencies, and industrial facilities.

1.3.5 Burns McDonnell

Burns McDonnell is a full-service engineering, architecture, construction, environmental and consulting solutions firm based in Kansas City, Missouri. Burns McDonnell works on numerous energy storage projects around the country and is providing site planning, landscape design, and visual simulation support for the Project.

1.3.6 Power Engineers

Power Engineers is an engineering and consulting firm that focuses on, among other disciplines, designing power delivery solutions. Power Engineers focuses on the transmission engineering for the Project, designing the Project substation, transmission line and advising on the connection with Eversource infrastructure.

SECTION 2.0 SITE DESCRIPTION

The Project Site is approximately 10.6 acres in size and as per the Town of Medway Assessor's maps is composed of four parcels (Parcels 46-057, 46-056, 46-055, and 56-006). Figure 2-1 below provides a site locus map (USGS base) for the Project Site, while Figure 2-2 below presents the four parcels that comprise the Project Site (aerial photo base). The Project Site contains approximately 0.85 acres of previously developed areas associated with three existing residences and an existing automotive repair facility, with the remaining approximately 9.76 acres predominantly forested upland and/or wetlands. Access is from Milford Street (Route 109) along the northern boundary of the Project Site. According to the MassDOT Road Inventory and a list of accepted town roads on the Town of Medway's website⁵, this portion of Milford Street (Route 109) is a town accepted roadway. There is an existing Eversource electric transmission corridor and other undeveloped land owned by Eversource to the west along with the existing Eversource West Medway Substation and the Exelon Corporation West Medway Generating Station to the south, a perennial stream (Center Brook) and residences on Little Tree Road and Summer Street to the east, and residences across Milford Street (Route 109) to the north.

⁵ https://www.townofmedway.org/sites/g/files/vyhlf866/f/uploads/accepted_street_list_12-17-21.pdf

Figure 2-1 Site Locus Map

G:\Projects\2\MA\Medway\6221\2022\EFSB\MXD\2-1_Site_Locus_Map_20220112.mxd

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

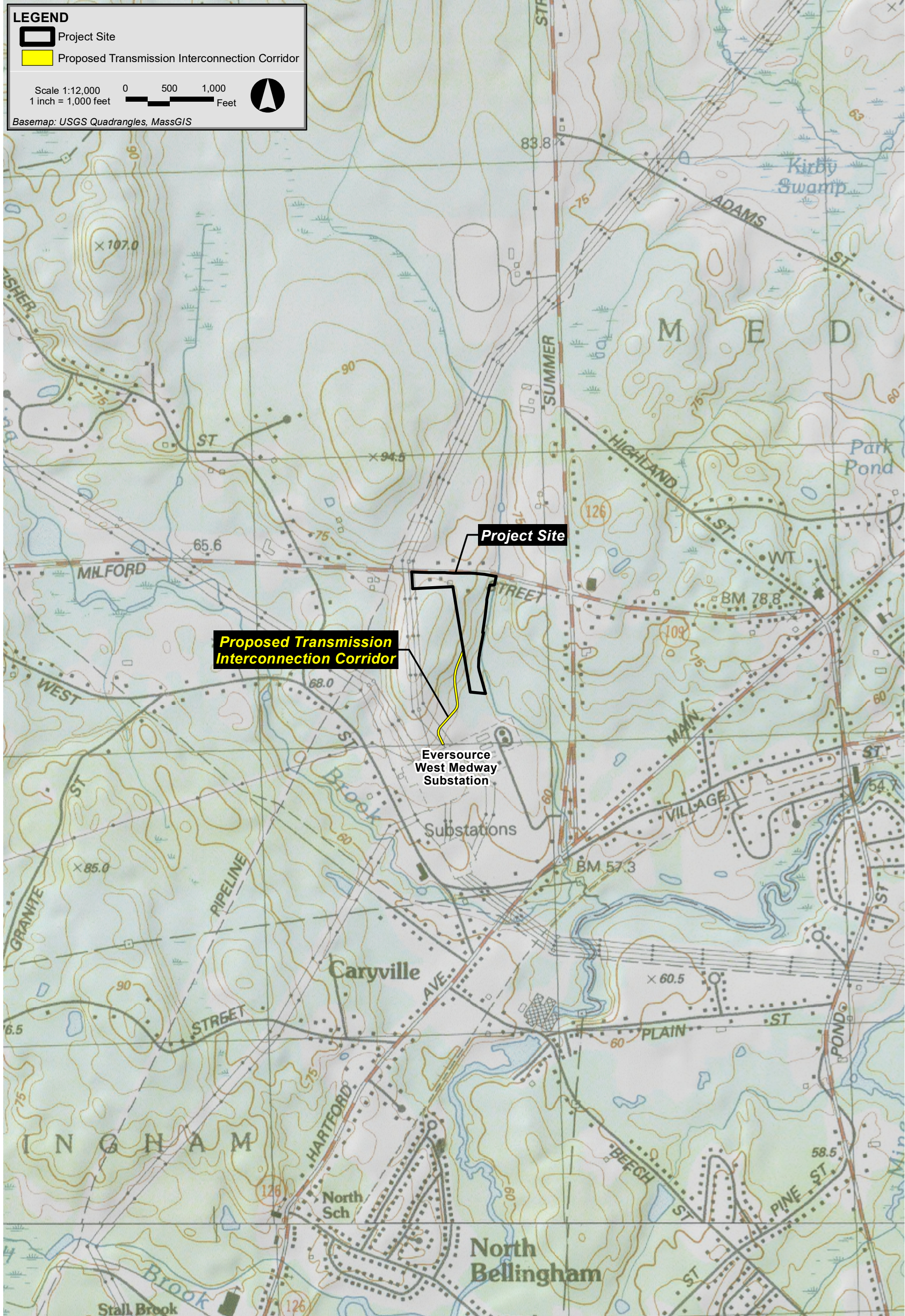


Figure 2-2 Site Locus Map (Tax Parcels)

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



The terrain on the Project Site is gently sloping from the west side to the east side. The Project Site is best characterized as a mixed upland forest. The dominant vegetation in the uplands consists of red oak (*Quercus rubra*), white oak (*Quercus alba*), white pine (*Pinus strobus*), red maple (*Acer rubrum*), lowbush blueberry (*Vaccinium angustifolium*), American witch-hazel (*Hamamelis virginiana*), bitternut hickory (*Carya cordiformis*), northern dewberry (*Rubus flagellaris*), and intermediate wood fern (*Dryopteris intermedia*). A palustrine forested wetland that borders Center Brook is located along the eastern side of the Project Site and extends off-site towards Little Tree Road and to the south toward the West Medway Generating Station. Center Brook is a perennial waterbody that flows from north to south and is a tributary to the Charles River. This forested wetland is predominantly vegetated with green ash (*Fraxinus pennsylvanica*), red maple (*Acer rubrum*), white pine (*Pinus strobus*), winterberry (*Ilex verticillata*), Japanese barberry (*Berberis thunbergii*), multiflora rose (*Rosa multiflora*), tussock sedge (*Carex stricta*), and skunk cabbage (*Symplocarpus foetidus*). The wetland boundary on the eastern portion of the Project Site has been verified and approved by the Medway Conservation Commission through an Order of Resource Area Delineation (“ORAD”), issued on February 27, 2020.⁶ Wetland resource areas on the Project Site and along/adjacent to the proposed transmission interconnection are associated with Center Brook and are subject to jurisdiction under the Massachusetts Wetlands Protection Act (“MWPA”) (G.L. c. 131 § 40), its implementing Regulations (310 CMR 10.00), the Town of Medway Wetlands Protection Bylaw (Article XXI), and the Rules and Regulations of the Town of Medway Conservation Commission (amended June 25, 2020). State and local wetland resource areas located on the Project Site and along/adjacent to the proposed transmission interconnection include Bordering Vegetated Wetland (“BVW”), Riverfront Area (“RFA”), and the 100-foot Buffer Zone to BVW.

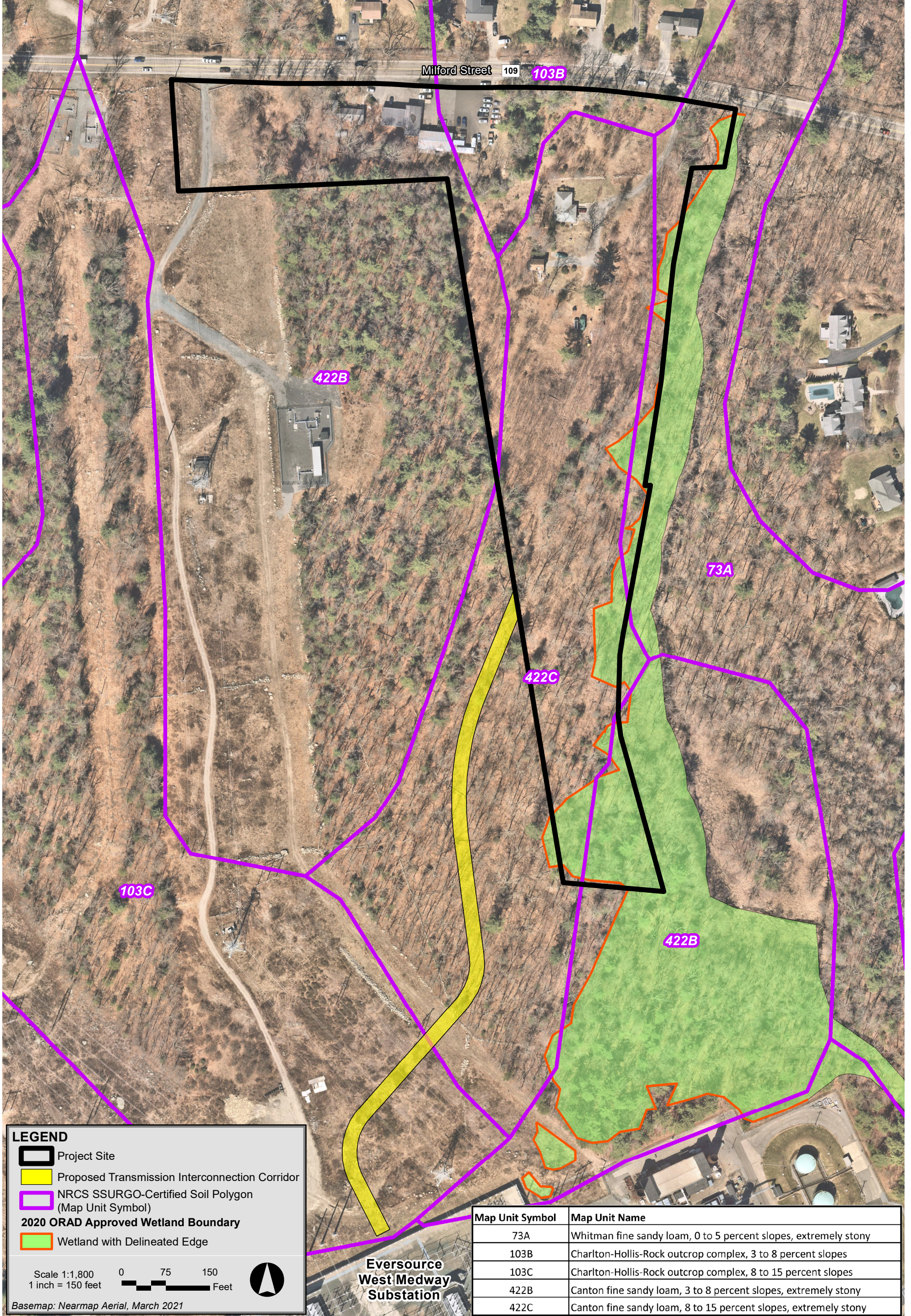
⁶ https://www.townofmedway.org/sites/g/files/vyhlf866/f/minutes/concom_02_27_20minutes.pdf

Soils on the Project Site consist of the following soil types: 60 % Canton fine sandy loam, 8 to 15 percent slopes, extremely stony, well-drained; Canton fine sandy loam, 0 to 8 percent slopes, extremely stony, well-drained; 12% Charlton-Hollis Rock outcrop complex, 3 to 8 percent slopes, well-drained; and 10% Whitman fine sandy loam, 0 to 3 percent slopes, extremely stony and very poorly drained. The Natural Resources Conservation Service considers Whitman fine sandy loam, 0 to 3 percent slopes a hydric soil. None of the Site's soils are considered Prime Farmland. Figure 2-3 below presents the existing conditions on the Project Site.

Figure 2-3 Existing Conditions

G:\Projects\2\MA\Medway\6221\2022\EFSB\MXD\2-3_Existing_Conditions_20220112.mxd

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

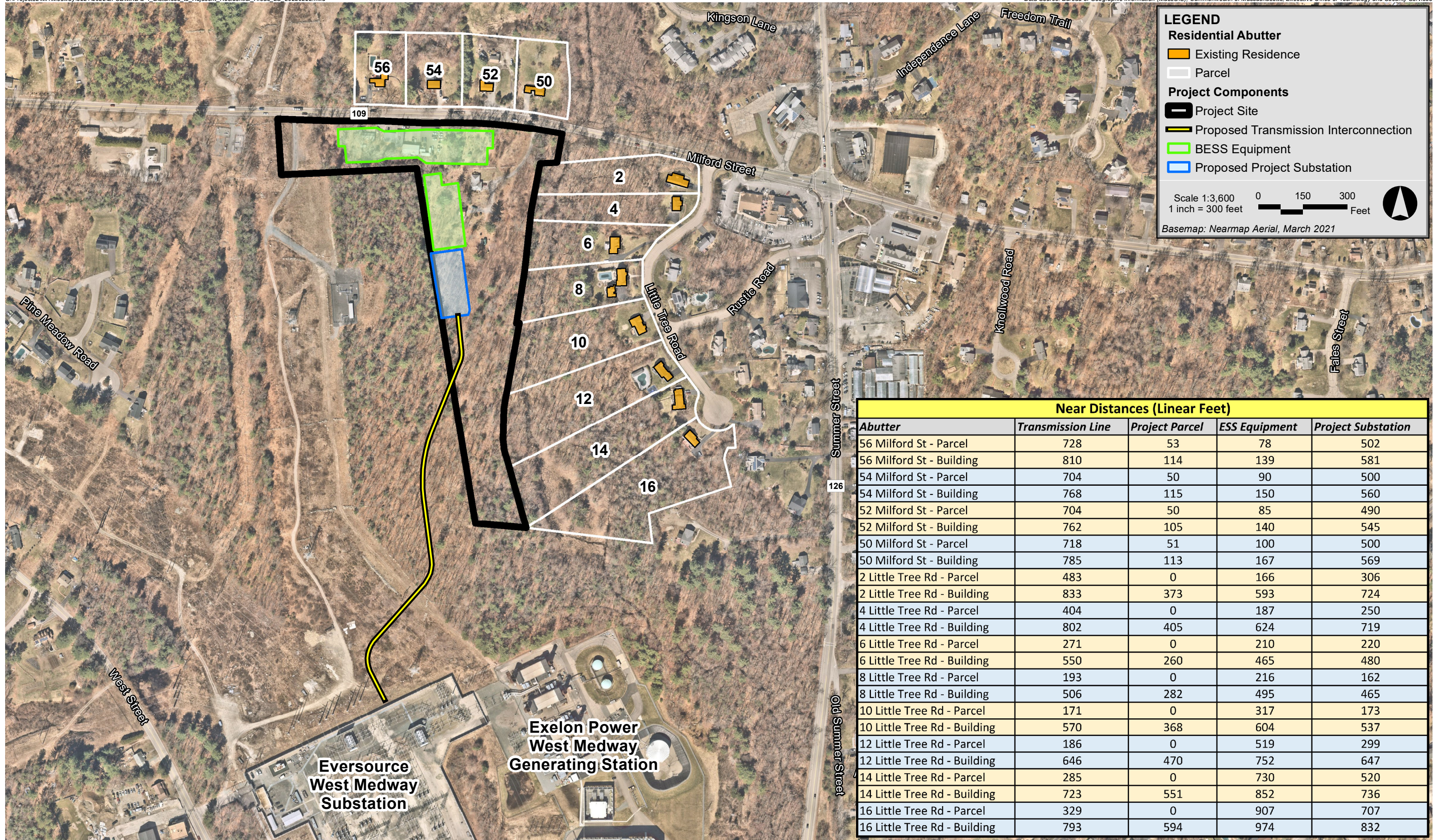


The closest residences are located to the north of the Project Site on the opposite side of Milford Street (Route 109). There are four separate residences in this area that are between approximately 105-115 feet from the northern parcel boundary of the Project Site. In addition, there are approximately eight separate residences located to the east of the Project Site, off Little Tree Road that range in distance from approximately 260 to 595 feet from the Project Site's eastern parcel boundary. The West Medway Generating Station and the existing Eversource substation facility are approximately 460 to 500 feet from the Project Site's southern parcel boundary. Figure 2-4 below presents distances from the Project Site to adjacent residences.

Figure 2-4 Distances to Adjacent Residential Areas

G:\Projects\2\WAMedway\622112022\EF\SB\MXD\2-4 Distances to Adjacent Residential Areas_LS_20220222.mxd

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



LEGEND

Residential Abutter

- Existing Residence
- Parcel

Project Components

- Project Site
- Proposed Transmission Interconnection
- BESS Equipment
- Proposed Project Substation

Scale 1:3,600
1 inch = 300 feet

0 150 300 Feet

Basemap: Nearmap Aerial, March 2021

Near Distances (Linear Feet)				
Abutter	Transmission Line	Project Parcel	ESS Equipment	Project Substation
56 Milford St - Parcel	728	53	78	502
56 Milford St - Building	810	114	139	581
54 Milford St - Parcel	704	50	90	500
54 Milford St - Building	768	115	150	560
52 Milford St - Parcel	704	50	85	490
52 Milford St - Building	762	105	140	545
50 Milford St - Parcel	718	51	100	500
50 Milford St - Building	785	113	167	569
2 Little Tree Rd - Parcel	483	0	166	306
2 Little Tree Rd - Building	833	373	593	724
4 Little Tree Rd - Parcel	404	0	187	250
4 Little Tree Rd - Building	802	405	624	719
6 Little Tree Rd - Parcel	271	0	210	220
6 Little Tree Rd - Building	550	260	465	480
8 Little Tree Rd - Parcel	193	0	216	162
8 Little Tree Rd - Building	506	282	495	465
10 Little Tree Rd - Parcel	171	0	317	173
10 Little Tree Rd - Building	570	368	604	537
12 Little Tree Rd - Parcel	186	0	519	299
12 Little Tree Rd - Building	646	470	752	647
14 Little Tree Rd - Parcel	285	0	730	520
14 Little Tree Rd - Building	723	551	852	736
16 Little Tree Rd - Parcel	329	0	907	707
16 Little Tree Rd - Building	793	594	974	832

There are no Outstanding Resource Waters (“ORWs”), Areas of Critical Environmental Concern (“ACECs”), or 100-year floodplain areas located near the Project Site. The Project Site is not located in a MassDEP Approved Zone I or Interim Wellhead Protection Area (Zone II). According to Massachusetts Natural Heritage and Endangered Species Program (“NHESP”) Atlas (August 1, 2021, 15th Edition), the site is not located within an area of Estimated Habitats of Rare Wildlife or an area of Priority Habitats of Rare Species. There are no mapped certified or potential vernal pools located on or near the site.