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PIPE LINE AWARENESS NETWORK
FOR THE NORTH EAST, INC.
www.plan-ne.org

September 16, 2022

VIA ELECTRONIC MAIL ONLY

Mark Marini, Secretary
Scott Seigal, Hearing Officer
Massachusetts Department of Public Utilities
One South Station, 5th Floor
Boston, Massachusetts 02110

RE: Comments in D.P.U. Docket No. 21-50, EFSB 21-01, *Procedures for Enhancing Public Awareness of and Participation in its Proceedings*

Dear Secretary Marini, Hearing Officer Seigal, and Service Lists:

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) submits the following comments regarding the inquiries of the Department of Public Utilities (the “DPU” or the “Department”) and Energy Facility Siting Board (“Siting Board”) into procedures for enhancing public awareness of and participation in their proceedings. PLAN is an organization formed with a mission that includes the statement: *“We envision a public that understands where its energy comes from and that is actively engaged in energy decisions that affect our communities and our region.”* PLAN has assisted many organizations and individuals in their attempts to navigate Department and Siting Board proceedings, the File Room, and published notices. From those experiences, we see that our vision can never begin to be realized without the improvements described by multiple stakeholders during the August 25, 2022 Roundtable presentations and more.

Following the August 25th Roundtable, the Department and Siting Board seek comments on the following topics:

- Improved communication with customers, community-based organizations (“CBOs”), and local government officials to maximize public engagement in our proceedings.
- Whether all notices for agency proceedings should receive the same level of publication and outreach, or whether there should be some prioritization or variation in approach to avoid overwhelming or desensitizing readers with frequent notices. If there should be variation, discuss the types of proceedings that warrant additional publication and outreach efforts.
- The most effective methods that Distribution Companies use currently to reach customers.

Our comments are centered on improved communications with customers, CBOs, and local municipal officials.

At the outset, it should be noted that any increases in awareness and participation proposed or implemented will be of no actual value if they prove to have no impact on the outcome of proceedings. The public’s input must be listened to *and matter*.

The DPU and Siting Board must take into account that the introduction of a project and related proceedings to a community often comes at a time of stress, maybe even at a high level, if the case impacts a community facing a new polluting gas facility, pipeline or similar high impact project. At such times of stress, it is typically harder for impacted people to process information, so we expect a heightened level of care and intentionality from our state agencies in making the projects and proceedings understandable to the public. We do appreciate the Siting Board’s efforts in creating project “landing pages” as an easier place for people to find some of the information they need than the DPU File Room.

We also ask that the agencies recognize that impacts are not narrowly circumscribed to include communities that are directly impacted by the physical installation of infrastructure. Impacts reverberate beyond town lines and public input should be valued and considered accordingly. Allowing, for example, a gas company to extend their distribution system out further, as Eversource has in DPU 22-107, impacts ALL communities along the line since that extension assures the whole system must be maintained and flowing for decades to come. Or take, for a siting example, the LNG liquefaction and trucking facility in Charlton approved in EFSB18-04. That plant will now prolong the life of fossil gas in the Commonwealth, increase transportation emissions as trucks drive their liquefied and stored LNG across the Commonwealth, and further delay the transition to actual clean energy solutions. The impacts are far greater than the direct abutters allowed in as parties.

We would also like to lift up the comments filed by the Massachusetts Climate Action Network in this proceeding describing the improvements necessary for intervention. PLAN itself has been denied participation many times. Arbitrarily shutting out voices doesn’t increase public participation. Listening only to the points of view of the project proponents’ doesn’t increase public participation.

In sum, this whole exercise will be pointless if the increased awareness and participation by the public results in no increase of impact on proceedings. The public, as multiple Joint Stakeholder Comments detail, must be informed sooner and more understandably, not after the proposal has been docketed and the outcome already a fait accompli.

Thank you for the opportunity to comment. We look forward to the continuing process of improving the public's ability to participate in the proceedings of the Department and Siting Board.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Cathy Kristofferson', with a long horizontal line extending to the right from the end of the signature.

Cathy Kristofferson
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