

Comments on Tentative Decision for Eversource's Petition for a Certificate of Environmental Impact and Public Interest Docket No. EFSB 22-01

November 29, 2022

**Massachusetts Energy Facilities Siting Board
Department of Public Utilities
One South Station
Boston, MA 02110**

Re: Tentative Decision in Docket No. EFSB 22-01

Members of the EFSB,

I write you today to voice the strong opposition of the Union of Concerned Scientists (UCS) to the EFSB's Tentative Decision to approve Eversource's Petition for a Certificate of Environmental Impact and Public Interest to locate a high-voltage substation in East Boston.

UCS is a non-profit organization that puts rigorous, independent science to work to solve our planet's most pressing problems. Joining with more than half a million members and supporters across the country—including more than 21,000 supporters in Massachusetts—we combine technical analysis and effective advocacy to create innovative, practical solutions for a healthy, safe, and sustainable future.

The Eversource substation project and process hardly meet the definition of innovative or practical, nor do they point to a healthy, safe, and sustainable future. Since 2019, our opposition to the proposal being considered by the EFSB has been based on the project's lack of clear technical merit; its poor location, including with regard to the commonwealth's need for climate-safe infrastructure; and the complete lack of appropriate community engagement in the process. Now, with the enactment of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy in 2021, the approval of the Eversource petition at this point would entirely dismiss the law's requirement of conducting a substantive analysis of [cumulative impacts for projects proposed in or near EJ communities](#) to prevent particular neighborhoods from being subjected to even greater industrial and environmental burdens.

Lack of clear technical merit. The project proposal falls short in a variety of technical aspects. One is the lack of demonstrated need for the substation in the foreseeable future. What little information Eversource has made public seems to ignore completely the changing circumstances of the electrical grid in the region and in Massachusetts since the

submission of the original project proposal, including with regard to changes in electricity demand. As stated in the June 2019 [testimony of the Applied Economics Clinic](#):

“Eversource would need to provide detailed information regarding the C-EB-L Load Area’s changing electric needs and the alternative solutions considered for addressing these needs. Without these materials, it is not possible to independently assess the need for additional transmission infrastructure. The materials submitted by Eversource to date neither demonstrate this need nor provide an up-to-date load and supply assessment for the area that would be served by an East Eagle Street Substation.”

Another technical issue related to the changing circumstances in the power sector since the original project proposal concerns the dramatic improvements in the availability and cost of alternatives to a business-as-usual approach. Those include both solar photovoltaics and energy storage. The information provided by Eversource shows no sign of alternatives having been envisioned, assessed on technical merits, and compared on a cost basis. UCS’s own [analysis of just one local clean energy option](#) strongly suggests there are plausible alternatives that Eversource has not sufficiently considered, given the changes in technologies, costs, and needs.

Eversource’s failure to provide up-to-date, transparent information justifying the need for the substation and evaluating alternatives provides no solid justification for its proposed cost to ratepayers of close to \$50 million.

Poor location, and lack of climate preparedness. Here, too, Eversource’s proposal fails in multiple respects. One is the chosen site, in a community whose residents, as we have [detailed](#), already face a [broad range of environmental justice challenges](#), including decades of industrial use that have left a legacy and ongoing burden of soil, air, and water contamination.

Many in the community are especially concerned about the risk of fire given the proximity of the proposed substation to where eight million gallons of jet fuel are stored. Likewise, the heavily visited American Legion Playground is just across the street from where the East Eagle substation would be located. The local community fears the substation will represent safety risks for the families that visit this playground.

Another concern is the flagrant dissonance between the proposed location and the commonwealth’s commitment to climate preparedness and climate-safe infrastructure, given that the site floods presently and, UCS analysis projects, will be at risk of [chronic inundation](#) (that is, at risk of flooding at least 26 times per year) by end of century due to sea level rise.

Complete lack of appropriate community engagement. A third category of failings concerns the project process’s failure to engage in any meaningful measure with the community. The community has [genuine concerns about the project](#), and the engagement process carried out by Eversource and the EFSB has been far from adequate to collect and consider those concerns. Those failures include an almost total lack of attention to language barriers. As

recounted by John Walkey of environmental justice non-profit organization GreenRoots about a pivotal meeting in the permitting process:

“Although English to Spanish interpretation was requested for the mostly Latinx attendees, the state only provided interpretation of Spanish testimonies to English for the benefit of the adjudicating board. This left community members to sit for four hours of a hearing which was not translated from English to Spanish.”

In a community that is more than half Latinx, including many non-English speakers, such an approach can in no way lead to effective community engagement.

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Given the above failings, we respectfully ask that the EFSB reconsider its Tentative Decision and not approve this or any related substation proposal from Eversource unless and until the proposal:

- is based on a cumulative impact assessment that demonstrates that the project will not exacerbate environmental and industrial burdens disproportionately affecting an environmental justice population;
- is based on full, up-to-date, and transparent data, including on electricity demand projections;
- is based on a cost-benefit analysis proving this substation is the most cost-competitive option, with due consideration of alternatives including renewable energy and energy storage;
- fully conforms with the commonwealth’s need to prioritize both environmental justice and climate-resilient energy infrastructure; and
- has received adequate and appropriate levels of input from the people of East Boston.

Massachusetts must be investing only in electrical infrastructure that will move us toward a modern grid that fully incorporates clean energy, and via only processes that engage affected communities that have been so burdened by historical decisions and approaches, so that we can accelerate our move to turn from the challenge of the climate crisis to the promise of a fair and clean energy economy.

We would appreciate your strong attention to the concerns of the community and concerns about the project.

Sincerely,



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