KEEGAN WERLIN LLP

ATTORNEYS AT LAW
99 HIGH STREET, SUITE 2900
BOSTON, MASSACHUSETTS 02110

(617) 951-1400

TELECOPIER:
(617) 951-1354

DAVID S. ROSENZWEIG
E-mail: drosen@keeganwerlin.com

February 28, 2023

Donna Sharkey, Presiding Officer
Energy Facilities Siting Board
One South Station
Boston, MA 02110

Re: NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-06/D.P.U. 19-142/19-143; NSTAR Electric Company, EFSB 10-2/D.P.U. 10-131/10-132

Dear Ms. Sharkey:

On December 16, 2022, the Energy Facilities Siting Board (the "Siting Board") issued its Final Decision approving, pursuant to G.L. c. 164, §§ 69J, 72, and G.L. c. 40A, § 3, the consolidated petitions of NSTAR Electric Company d/b/a Eversource Energy ("Eversource" or the "Company") to construct, operate, and maintain: (1) a new, approximately 12.5-mile, overhead electric transmission line (the "New Line") capable of operating at 345 kilovolts ("kV") along an existing Company right-of-way ("ROW"), ROW 342, between Eversource's Bourne Switching Station in Bourne and West Barnstable Substation in Barnstable;[1] and (2) certain modifications at the existing West Barnstable Substation in order to accommodate the New Line. NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-06/D.P.U. 19-142/19-143, at 114-18 (2022) ("Final Decision"). The New Line and related station work are referred to as the MidCape Reliability Project (the "MidCape Project"). With respect to the approved modifications at West Barnstable Substation, the Siting Board granted, pursuant to G.L. c. 40A, § 3, both individual and comprehensive zoning exemptions for the Project from the operation of the Barnstable Zoning Ordinance. Final Decision at 115.[2]

The Siting Board's Final Decision approving the Project with the Noticed Variation

[1] The Company initially proposed to construct the New Line to 115-kV design specifications; however, during the proceeding, the Company presented evidence supporting the approval of a Noticed Variation involving construction of the Project with a design capable of operating the New Line at 345 kV in anticipation of the future need for operating at that voltage. Exhs. EV-1(A) at 1-2; RR-EFSB-10; RR-EFSB-10(1); RR-EFSB-10(2); RR-EFSB-10(S1). As described in more detail below, the New Line will now be required to operate at 345 kV as part of the interconnection of the Park City Wind LLC ("PCW") project, which is currently pending before the Siting Board in EFSB 20-01/D.P.U. 20-56/20-57.

[2] The West Barnstable Substation was initially constructed in 2012 as part of the Company's Lower Southeastern Massachusetts ("SEMA") Reliability Project, which was approved by the Siting Board in EFSB 10-2/D.P.U. 10-131/10-132 (2012) ("NSTAR Lower SEMA"), and which approval included, pursuant to G.L. c. 40A, § 3, the grant of individual and comprehensive zoning exemptions from the Barnstable Zoning Ordinance.

included the Siting Board's standard directive regarding project changes that the Company "notify the Siting Board of any changes other than minor variations to the proposal so that the Siting Board may decide whether to inquire further into a particular issue." Final Decision at 118.[3] In addition, the Final Decision includes the following condition regarding the Noticed Variation:

> The Siting Board directs the Company to file with the Siting Board information regarding the remaining steps to complete the conversion of the 115 kV Noticed Variation approved in this Decision to full 345 kV transmission capability for the purposes of providing interconnection of new wind projects to the regional grid. Such filing shall be made no fewer than 120 days prior to any intended construction or operational changes to effect 345-kV service. The filing should include at a minimum: environmental impacts, updated cost figures, a construction timeline, a clarification of steps that would need to be taken for Eversource to be able to provide full 345 kV transmission services (e.g., additional easement rights), a clarification of all equipment modifications necessary to convert the New Line to 345 kV. In addition, the Company should describe and provide, when available, any additional agreements related to the interconnection arrangements, and the collection of costs associated with the 345 kV transmission facilities.

Final Decision at 116 (Condition D).

During the underlying proceeding, the Company explained that, because the need for and impacts associated with operating the New Line at 345 kV were not known at the time (as opposed to merely constructing the New Line to be capable of operation at 345 kV), the Company would return to the Siting Board for permission to operate the New Line at 345 kV "when warranted." Exh. EV-1(A), at 2-17. It was Eversource's expectation that, with the emergence of new offshore wind generating facilities that would seek to interconnect to the Company's transmission system on the Cape, a 345-kV line and associated substation equipment would ultimately be needed for the safe and reliable interconnection of those offshore wind facilities, such as PCW. Exhs. EFSB-N-17(S1); EFSB-N-25. Given the continued progress of PCW's development, along with the completion of the System Impact Study ("SIS") for PCW by ISO New England Inc. ("ISO-NE"), and the related commercial agreements that have been executed between Eversource and PCW, operation of the New Line at 345 kV is now warranted and, consequently, the Company is proposing to undertake several project changes to enable the New Line to operate at 345 kV.

[3] The Siting Board's decision in NSTAR Lower SEMA likewise included the same directive to the Company to "notify the Siting Board of any changes other than minor variations to the proposal so that the Siting Board may decide whether to inquire further into a particular issue." NSTAR Lower SEMA at 119.

I. Standard of Review

The Siting Board has established a clear standard for evaluating project changes. Cape Wind Associates, LLC and NSTAR Electric Company – Project Change Filing, EFSB 02-2B/EFSB 07-08A (2014); Colonial Gas Company d/b/a National Grid – Project Change Filing, EFSB 05-2A (2014). In determining whether additional inquiry is necessary regarding a proposed project change, the Siting Board will conduct such an inquiry only if the change alters in any substantive way either the assumptions or conclusions reached in its analysis of the project's environmental impacts in the underlying proceeding. Cape Wind Associates, LLC and NSTAR Electric Company – Project Change Filing, EFSB 02-2B/EFSB 07-08A at 5; Colonial Gas Company d/b/a National Grid – Project Change Filing, EFSB 05-2A at 8; Berkshire Power Decision on Compliance, 7 DOMSB 423, at 437-39 (1997). Where the proposed modification is small and does not represent a substantive change from the previously approved design, further inquiry by the Department of Public Utilities (the "Department") or Siting Board is not required. NSTAR Electric Company, D.P.U. 13-177/13-178, Hearing Officer Letter (January 29, 2016); NSTAR Electric Company, EFSB 10-2A/D.P.U. 10-131/10-132, Presiding Officer Letter (November 1, 2012).

Where the Siting Board determines that further inquiry is warranted, the additional inquiry is narrowly focused on only the issues raised by the proposed project change. Colonial Gas Company d/b/a National Grid – Project Change, EFSB 05-2A at 8, citing Ruling on Intervenors' Request That Brockton Power's Project Change Filing be Treated as a New Petition, EFSB 07-7A/D.P.U. 07-58/07-59, at 12 (2010).

II. Overview of Project Changes to Operate the New Line at 345 kV

The Company must now undertake the following project changes to enable the operation of the New Line at 345 kV as dictated by ISO-NE's SIS for the PCW project:

(a) Operate and interconnect the New Line at 345 kV;
(b) Expand West Barnstable Substation for 345-kV operation;
(c) Construct a new 345-kV Bourne Station (including the sectionalizing of existing Lines 322 and 399, as well as the New Line operating at 345 kV)[4] (referred to as the "345-kV Bourne Station"); and
(d) Uprate the summer long-time emergency ("LTE") rating of the portion of Line 399 from the new 345-kV Bourne Station to Carver Substation to 1,200 MVA or above.

[4] The New Line operating at 115 kV, as approved by the Siting Board, is designated by the Company as Line 144. Once the New Line begins operating at 345 kV, it will be re-designated as Line 3999. Line 322 was initially constructed pursuant to Department approval in New Bedford Gas & Edison Light Co.; Montaup Elec. Co.; Boston Edison Co., D.P.U. 14898/14900/14917 (January 5, 1966). Line 399 was constructed pursuant to Siting Board approval in NSTAR Electric Company, EFSB 10-2/D.P.U. 10-131/10-132 (April 27, 2012). The need for and impacts relating to tapping existing Lines 322 and 399 are also discussed further below.

In total, these upgrades are estimated to cost approximately $154.7 million. After receipt of required permits, the Company expects to commence construction on or before October 2024, with a targeted in-service date by April 2026. A fuller description of the need for these upgrades, as well as the associated environmental impacts, are discussed in more detail in the sections that follow.

III. Need for Operation of the New Line at 345 kV

The project changes described herein are needed by Eversource to enable operation of the New Line at 345 kV to accommodate and interconnect PCW's approximately 800-megawatt ("MW") wind-energy generation facility to the New England electric grid on the Cape (the "PCW Project").[5] The Siting Board has established a two-part standard for assessing the need for such system upgrades. Vineyard Wind LLC, EFSB 17-05/D.P.U. 18-18/18-19 at 11 (2019) ("Vineyard Wind I"); Cape Wind Associates, LLC, EFSB 02-2, at 13-17 (2005) ("Cape Wind"); Alliance to Protect Nantucket Sound, Inc. v. Energy Facilities Siting Board, 448 Mass. 45, 51 (2006) (affirming the Cape Wind need standard on appeal). Pursuant to the Cape Wind standard, an applicant must show: (1) "that the existing transmission system is inadequate to interconnect the new or expanded generator"; and (2) "that the new or expanded generator is likely to be available to contribute to the regional energy supply." Vineyard Wind 1 at 11; Cape Wind at 17.

Here, for the Siting Board's purposes, absent the upgrades needed to operate the New Line at 345 kV, the existing transmission system on the Cape is not capable of safely and reliably interconnecting the PCW Project at 345 kV. The extent of modifications needed to interconnect the PCW Project was established in ISO-NE's SIS for QP#700, as issued on October 6, 2020. A copy of the SIS was provided in the underlying proceeding as Exhibit EFSB-VW-12(S1)(1). Among other things, the SIS evaluated the expected system impacts and required facilities needed to upgrade the Company's transmission system to interconnect the PCW Project. The report evaluated the system impact based on steady-state, short-circuit and stability analyses and found that, with the system additions identified below, the proposed project would not have an adverse impact on the regional transmission system after certain required upgrades are implemented by Eversource. Those upgrades include:

- Build the New Bourne 345-kV gas-insulated switchgear ("GIS") Substation consisting of three bays with a total of eight new breakers.
- Connect the existing 322 and 399 Lines into the New Bourne 345-kV Substation. The

[5] The Siting Board jurisdictional components of the PCW Project, including an underground 3,900-foot, 345-kV transmission line within Eversource ROWs between PCW's proposed new onshore substation and Eversource's West Barnstable Substation, to be constructed and operated by Eversource, are under review and currently pending in Park City Wind LLC f/k/a Vineyard Wind LLC, EFSB 20-01/D.P.U. 20-56/20-57. During the Siting Board's review of Eversource's MidCape Project, the PCW Project was referred to as "QP#700," which was the PCW Project's position in the ISO-NE interconnection queue. As described below, this project change filing is predicated on the Siting Board's approval of the PCW Project, including the 3,900-foot underground transmission line to be constructed by Eversource to interconnect PCW's facilities to the expanded West Barnstable Substation.

LTE rating of the 3999 Line from New Bourne to West Barnstable would be upgraded to 1,083 MVA or above when the Noticed Variation is converted to 345 kV.

- Upgrade the existing West Barnstable 345-kV Substation as GIS with four bays and ten new breakers.
- Operate the planned Mid-Cape line (Line 144) at 345 kV connecting New Bourne and West Barnstable 345-kV substations.
- Install a second 345/115-kV transformer at West Barnstable and install one 115-kV breaker.

To establish the commercial terms for implementation of the system upgrades identified in the SIS, in March 2022, Eversource and PCW entered into a Settlement Transmission Support Agreement ("TSA"), pursuant to which Eversource and PCW agreed to various terms and conditions to accommodate the PCW Project ("PCW Upgrades"). A copy of the TSA was provided in the underlying proceeding as Exhibit RR-EFSB-6(S2)(1).[6] The PCW Upgrades enumerated in the TSA included a suite of equipment additions further referred to as "Phase II Upgrades." Id. at 13-14. The scope of the Phase II Upgrades includes the station and line work described above. These upgrades, as first identified in the SIS by ISO-NE, are now the subject of binding contractual arrangements between Eversource and PCW and have been approved by FERC; thus, the upgrades are needed to safely and reliably interconnect the PCW Project to the regional transmission grid. Accordingly, the project changes satisfy the first prong of the Cape Wind analysis. Indeed, the Siting Board found in the Final Decision that the PCW SIS required the construction of a 345-kV line on Cape Cod and further found that, even if the PCW Project is not built, because the ISO-NE interconnection queue has identified more than 2,600 MW of offshore wind proposed to interconnect at the West Barnstable Substation, it is "clear that some offshore wind projects will interconnect on Cape Cod, necessitating 345 kV service." Final Decision at 25.

With respect to the second prong of the Cape Wind analysis, whether the PCW Project is "likely to be available to contribute to the regional energy supply," that issue is being thoroughly evaluated and addressed in the Siting Board's pending review of the PCW Project in EFSB 20-01/D.P.U. 20-56/20-57. Eversource anticipates that the Siting Board will make favorable findings on this issue and, to the extent the Siting Board determines that the PCW Project is likely to be available to contribute to the regional energy supply, those findings would likewise establish that the project changes described herein are needed. In this way, Eversource and the project changes proposed in this proceeding will be aligned with the Siting Board's ultimate decision in EFSB 20-01/D.P.U. 20-56/20-57 and will comply with the second prong of the Cape Wind need analysis.

---

[6] The Federal Energy Regulatory Commission ("FERC") approved the TSA by Letter Order dated June 17, 2022. NSTAR Electric Company and Park City Wind LLC, Docket No. ER22-1247-000, 179 FERC ¶ 61,200. In the Letter Order, FERC required a compliance filing with revised tariff records within 30 days of the Letter Order. In compliance with FERC's directive, Eversource submitted tariff records of the TSA in Docket No. ER22-2402-000 on July 18, 2022, which FERC accepted on September 22, 2022.

IV. Analysis of Project Changes to Operate the New Line at 345 kV

The environmental impacts of each of the project changes needed to operate the New Line at 345 kV to enable the interconnection of the PCW Project are described further below.

A. Interconnection and Operation of New Line at 345 kV

As noted above, as part of the Final Decision, the Siting Board approved the *construction* of the New Line to be capable of operation at 345 kV, but imposed a condition that, when *operation* of the New Line at 345 kV is warranted, the Company would return to the Siting Board for authorization to operate the New Line at 345 kV. Final Decision at 116. For the reasons stated in Section III, above, operation of the New Line at 345 kV is now warranted. All overhead line construction approved by the Siting Board will be capable of operating at 345 kV. With the exception of two new riser structures located on the existing ROW and the West Barnstable Substation parcel, there are no physical additions or modifications required on the New Line or the existing ROW to operate the New Line at 345 kV. As discussed in further detail in Section IV.B, below, the incremental environmental impacts associated with these two new riser structures will be considered by the Department in D.P.U. 23-22 and, in any event, are minimal relative to the potential environmental impacts already analyzed by the Siting Board.

With respect to electric and magnetic fields ("EMF") associated with the operation of the New Line at 345 kV, as documented in the underlying proceeding (see Exhibits RR-EFSB-15; RR-EFSB-15(1)), the proposed system changes will have an insignificant effect on EMF and the resulting levels will be far below health-based standards established by the International Commission on Non-Iodizing Radiation Protection ("ICNIRP") and the World Health Organization.

B. Expansion of the West Barnstable Substation

There are two aspects of changes needed at West Barnstable Substation: (1) minor modifications to the scope of work needed to connect Line 144 into the 115-kV yard; and (2) changes associated with the need to construct and operate a 345-kV section of the yard to accommodate the interconnection of the PCW Project. Regarding the changes to the 115-kV yard, one additional new 115-kV breaker needs to be installed to complete a three-breaker bay to provide a switching position for the proposed new autotransformer.[7] The three-breaker bay is required as part of the construction sequencing associated with connecting PCW, the new 345/115-kV autotransformer, and Line 144 (MidCape Project initially operating at 115 kV). Please refer to Attachment A for a General Arrangement Drawing of West Barnstable Substation, including the

[7] The need to install this third 115-kV breaker was identified when it became known that the PCW SIS erroneously showed the third breaker on the 115-kV bus segment as currently in existence as a pre-Project condition, rather than being added for the PCW Project. The error was noticed when discussions began surrounding how Eversource would construct and energize PCW's new Onshore Substation and it was noted that the third breaker was necessary for the proposed energization sequence for the PCW Project, but that the addition of the third breaker had not been included in the design up to that point.

location of the new third breaker. No additional zoning relief is needed to install the third breaker in the approved 115-kV portion of the Substation.

With respect to the 345-kV expansion work at West Barnstable, on this date, Eversource filed with the Department, a petition pursuant to the provisions of G.L. c. 40A, § 3, requesting individual and comprehensive zoning exemptions from the operation of the *Zoning Ordinance of the Town of Barnstable* to facilitate the expansion (the "Zoning Petition"). The Company's Zoning Petition is docketed as D.P.U. 23-22. An additional figure showing the work to be performed for the expansion at West Barnstable Substation is provided herewith as Attachment B. The Zoning Petition contains a full description of the work necessary at West Barnstable Substation, and includes a full analysis of issues of need, estimated costs, and environmental impacts, as well as the Company's plans to minimize such impacts. The Zoning Petition also describes the Company's abutter and stakeholder outreach efforts in Barnstable.

Because the need for and impacts relating to the expansion work at West Barnstable will be fully analyzed and reviewed in that separate Department docket, the Company proposes that the Siting Board's review of that same work be conducted and approved as part of this project change filing under the Siting Board's standards of review for project changes, but subject to and conditioned on the results of the Department's review of the Company's Zoning Petition pursuant to G.L. c. 40A, § 3. This would ensure efficient use of both agencies' resources and avoid duplicative reviews. It would also allow the Siting Board to complete its review of the various project changes presented herein in a timely manner, while allowing the Department to conduct its parallel review of the petition for zoning exemptions for the West Barnstable Substation in a separate proceeding.[8]

C. Construction of the New 345-kV Bourne Station

To implement the system upgrades identified in the SIS at Bourne, a new 345-kV station adjacent to the existing 115-kV Bourne Switching Station is required. The new 345-kV Bourne Station will be located in the Town of Bourne (the "Town") on land within Joint Base Cape Cod (the "JBCC"), east of the Cape Cod Canal and Sandwich Road.

- *Existing Site Conditions at the Bourne Project Site*

More specifically, the new 345-kV Bourne Station and related line work will be located adjacent to the recently-constructed 115-kV Bourne Switching Station #917 (the "Replacement

[8] Under this approach, the Company would not undertake construction of the West Barnstable Substation 345-kV expansion that is needed to accommodate the PCW Project's interconnection until it has been approved by both the Siting Board and the Department. All other work described in this letter, however, would be undertaken upon approval by the Siting Board.

115-kV Station") (the "Project Site").[9] Please see Attachment C for aerial photographs illustrating the proposed scope of work relative to existing facilities at the Project Site, and Attachment D for a General Arrangement Drawing of the new 345-kV Bourne Station. The Original 115-kV Station will be demolished after certain existing transmission lines are cutover to the Replacement 115-kV Station. While most of the line cutover work is complete, the balance of the work is scheduled to be completed later in 2023. The Original 115-kV Station occupies a footprint of approximately 0.6 acres. It is fully enclosed within a chain link fence and the equipment is located on a bed of crushed stone. Overhead and underground transmission line wires and cables connect into these station facilities via the adjacent ROWs, including an approximately 0.24-acre cable riser station located east of these facilities. The cable riser station transitions an overhead line for connection to the Replacement 115-kV Station via an underground transmission line section.

The undeveloped portions of the Project Site are located within the existing transmission line ROWs and are typical of the well-drained, early successional habitats on Cape Cod, and consist of a mix of grassland and scrub-shrub vegetation (e.g., huckleberry, low bush blueberry, etc.). These areas are managed in accordance with Eversource's Vegetation Management Plan ("VMP"). As with all active ROWs, tree species are generally managed so that mature examples of any large tree species are absent. In general, uplands within the ROW area are predominantly grass and scrubland containing various low shrubs, herbs, forbs, and graminoids. As described in further detail below, no work is proposed within the adjacent forested areas beyond those locations where tree removal was previously authorized for construction of the Replacement 115-kV Station and the MidCape Project 115-kV transmission line interconnection; the adjacent forested areas consist primarily of pitch pine and scrub oak. Portions of the landscape within the ROW contain boulders and the topography ranges from flat to very steep. Soils within the Project Site and adjacent areas are uniformly well-drained sands and gravels typical of upper Cape Cod surficial geology (see Attachment E, Soils).

There are no local, state, or federal wetland resource areas, waterbodies, Outstanding Resource Waters ("ORWs"), Areas of Critical Environmental Concern ("ACECs"), or floodplain areas located near the Project Site. The Project Site is also not located in the Town of Bourne Groundwater Protection Overlay District, Massachusetts Department of Environmental Protection ("MassDEP") Approved Zone I, Interim Wellhead Protection Areas (Zone II), or Freshwater Recharge Areas (Cape Cod Commission) (see Attachment F, Water Resources).

---

[9] This new 345-kV Bourne Station will be the second new switching station to be constructed in Bourne in recent times. On March 6, 2019, the Company submitted a letter to the Department informing the Department of the Company's proposal to replace the then-existing 115-kV Bourne Switching Station (the "Original 115-kV Station") with a new 115-kV station, along with associated line work. Upon review of the Company's proposal, on June 3, 2019, Department staff indicated that it had no further questions, thereby indicating that the work could proceed. Construction of the Replacement 115-kV Station was completed and placed in service in December 2021. The Company does not require any local permits (zoning or otherwise) from the Town of Bourne for the 345-kV Bourne Station.

The entire Project Site contains mapped upland habitat for state-listed species.[10] These species and their habitats are protected pursuant to the Massachusetts Endangered Species Act ("MESA") and its implementing regulations (321 CMR 10.00).

- *Description of Proposed Work*

This new 345-kV Bourne Station requires site preparation and the installation of 345-kV equipment, including facilities for the cable termination of five (5) 345-kV lines, and three bays (five (5) line positions and eight (8) 345-kV breakers) with bus and connections. A new station control house for the 345-kV control and protection panels is also needed to operate the new 345-kV station. The 345-kV Bourne Station will comply with the Northeast Power Coordinating Council, Inc. ("NPCC") bulk power system specifications and, once built, will loop in two existing transmission lines (Line 322 and Line 399), as well as accommodate Line 3999.[11] Auxiliary power for the new 345-kV Bourne Station will be derived from the adjacent 115-kV Bourne Station by installing two sets of three-phase station service voltage transformers ("SSVTs") in the yard at the 115-kV Bourne Station, one set on each 115-kV bus. This installation will not involve expanding the existing 115-kV Bourne Station, but will require the installation of low voltage power cables between the two facilities for the output of the SSVTs. Please see Attachment C for aerial photographs illustrating the proposed scope of work, including the location of the new 345-kV Station and related overhead and underground transmission line work, as well as proposed staging and laydown areas. The work to connect existing overhead Line 322 and Line 399 into the new 345-kV Bourne Station will require a transition to underground due to the number of overhead lines traversing the area. To accomplish this transition, five structures will be sited on the ROW and duct banks will be run to the new 345-kV Bourne Station. Because the Project Site is remotely located within JBCC, there are no abutting residential properties. The closest residences are to the northeast of the Project Site, approximately 700 feet away from the Replacement 115-kV Station.

The new 345-kV Station will occupy a footprint of approximately 0.73 acres within the proposed fence line, with equipment located on a bed of crushed stone. The construction process for the 345-kV Station includes the following principal phases: (1) establishment of staging and laydown area; (2) site preparation including grading and slope stabilization measures generally in the location of the Original 115-kV Station once it has been demolished (e.g., loam, seed, stone, etc.);[12] (3) installation of the below-grade conduits, grounding and foundations; (4) installation of equipment pads; (5) setting of large equipment; (6) electrical wiring; (7) startup; (8) reconfiguration and construction of overhead and underground lines (see discussion below); and (9) site stabilization and site restoration measures.

---

[10] See https://maps.massgis.digital.mass.gov/MassMapper/MassMapper.html.

[11] As noted above, once the New Line (previously designated as Line 144) begins operating at 345 kV, it will be designated as Line 3999.

[12] Demolition of the Original 115-kV Station is scheduled to begin in September 2023 and be finished by December 2023.

The existing gravel access roads will provide access to the 345-kV Station, and no new permanent gravel access roads, or new paved access roads are proposed. The permanent storm water management system will be designed to comply with MassDEP's Stormwater Standards, including installation of a crushed stone pad within the Station's fence line to promote groundwater recharge. A riprap diversion swale will also be installed along the southern side of the 345-kV Station.

The ancillary line work includes the installation of five (5) new riser structures to facilitate the transition of certain overhead transmission line segments to an underground transmission line design, including five underground transmission line duct banks that will extend from these riser structures to the new 345-kV Station. The riser structures will consist of steel monopoles installed on reinforced concrete foundations. Engineered concrete foundations for these types of structures are typically drilled piers, also known as drilled caissons, with diameters varying from 7 to 11 feet with embedded depths ranging from 25 to 45 feet, depending on the height and load conditions for the structure. As a result of the installation of the transition structures, one adjacent existing wood structure will need to be replaced with a new steel structure approximately 10 feet taller because of the existing geometry. Three others will need modifications such as new cross arms, or similar, to withstand differential loads imposed by the installation of the new transition structures. Due to the new transmission line configuration, four existing structures will no longer be needed and will be removed. Please see Attachment C for an overview figure and Attachment G for Cross-Section Drawings and ROW Configuration illustrating this work at the new 345-kV Bourne Station and along the ROW to West Barnstable.

To maintain system reliability during lightning storms, the transmission line riser structures will be grounded by installing a loop of galvanized wire (counterpoise) around each structure base, as well as a system of either continuous counterpoise, semi-continuous counterpoise, or a series of short grounding leads connected to ground rods, depending on site specific conditions. Counterpoise wire is typically buried using standard trenching equipment (e.g., Ditch Witch™) to a depth between 12 inches and 18 inches below grade.

The following Table 1 below identifies the height of each proposed riser structure. Please refer to Attachment C for the locations of these structures.

Table 1 Overhead 345-kV Riser Structures List

Riser Structure ID	Approximate Structure Height (feet)
Str. 399-1	161
Str. 322-1	161
Str. 322-2	161
Str. 3998-1	161
Str. 3999-1	161

The five underground duct banks will be installed in approximately eight-feet wide and approximately ten-feet deep trenches. No manholes are required. Each trench will require an approximately 20-foot-wide temporary workspace area along the length of the trench to install the underground duct bank(s). Following construction of the underground duct banks, the areas will be substantially restored to their preexisting conditions and stabilized with a native seed mix or sandy soils if required by the Natural Heritage and Endangered Species Program to enhance rare species habitat. The proposed work does not involve any tree removal beyond that which was already approved for the Bourne Switching Station Replacement Project and MidCape Project. The following Table 2 below identifies the length of each duct bank from the proposed riser structure to the 345-kV Station.

Table 2 Underground 345-kV Duct Bank Lengths

Duct Bank ID	Approximate Duct Bank Length from Riser Structure to Connection Point within the New 345-kV Station (feet)
Line 399-1	355
Line 322-1	423
Line 322-2	471
Line 3998-1	380
Line 3999-1	530

- *Rationale for Loop in of Line 322 and Line 399*

Once looped into the new 345-kV Bourne Station, Line 399 will be bifurcated from the 345-kV West Barnstable substation to the 345-kV Carver substation, and Line 322 will be bifurcated from the 345-kV Canal substation to the 345-kV Carver substation. As a result, Line 399 will be split into two lines (Line 399 and Line 3998), and Line 322 will be split into two lines (Line 322 and 3222). Table 3, below, provides the line number designations for each line after completion of all of the line work.

Table 3 Resulting Line Number Designations

Previous Line Designation	New Designation
399W	399
399E	3998
322W	322
322E	3222
New Mid Cape Line (Line 144)	3999

In the PCW SIS, it was determined that during certain system conditions, an event could occur that would result in transmission system instability (potential for cascading outages). Exh. EFSB-VW-12(S1)(1), at 87, 114. These instability issues could be resolved only with 345-kV network upgrades. After considering factors such as access to right of ways for transmission lines and space for a station, the recommendation was made to build a new 345-kV station at Bourne and to sectionalize the 399 and 322 lines into the new station. The purpose of this sectionalizing work is to strengthen the capability to supply PCW's offshore wind output on the 345-kV transmission system by enhancing export capacity off the Cape and into the electric grid serving southeastern Massachusetts.

- *Construction Schedule*

The construction of the Bourne Substation is scheduled to begin on or before October 2024 and be substantially completed in December 2025. The proposed in-service date for the 345-kV associated work is April 2026, with the overall total duration expected to be approximately eighteen (18) months.

- *Environmental Impacts*

Eversource has undertaken detailed analyses of the environmental impacts of the new 345-kV Bourne Station, has identified the relevant impacts, and has proposed measures to minimize those impacts, as discussed further below. These impact minimization measures include, but are not limited to:

- Siting of the new 345-kV Bourne Station will occur predominantly within the footprint of the Original 115-kV Station that will be demolished prior to the start of construction.

- The footprint of the new 345-kV Bourne Station has been minimized by optimizing the equipment arrangement and layout and use of GIS. For perspective, the footprint of the new 345-kV Bourne Station is only nominally larger than the footprint of the Original 115-kV Station, by approximately 0.13 acres.

- Topography in the location of the new 345-kV Bourne Station is relatively flat and the proposed grading plan avoids extensive cuts and fills to create a level site for the work.

- Siting of all underground transmission line connection work and new overhead transmission line riser structures will occur in previously altered areas and Eversource's actively maintained ROW, consisting of a mix of grassland and scrub-shrub vegetation. Accordingly, no tree removal is proposed in Bourne.

- Areas disturbed by trenching and backfilling will be restored with loam and stabilized with native grasses following construction.

- No new permanent gravel access roads are proposed. Construction equipment will operate on existing access roads and constructed work pads.

As described in further detail below, given the remote area that is proposed for construction and the nature of the work relative to existing conditions in and around the Project Site, impacts to the environment will be minimal and temporary. Moreover, after the new 345-kV Bourne Station and related line work is complete, the land in and around the Project Site will be utilized for the same purpose as previous; namely, as the location of a new station, with overhead and underground electric transmission line infrastructure.

Land Use

The new 345-kV Bourne Station is located in a remote section of the JBCC and will have no permanent effect on the existing pattern of land use in the area and/or within the JBCC itself. The existing ROWs surrounding the new 345-kV Bourne Station were established between 1938 and 1973. As noted above, the new 345-kV Bourne Station will be located predominantly within the footprint of the original 115-kV Station that is scheduled to be demolished, adjacent to the Replacement 115-kV Station. It will also be located in existing easements that are occupied by existing overhead and underground transmission and distribution lines.

Land use impacts associated with the construction of the project changes are summarized in the table below.

Summary of Land Use Impacts

Activity	Impact Estimate (acres)	Temporary or Permanent Impact?	Description of Work
New 345-kV Bourne Station	0.73	Permanent	Includes area within the proposed fence line. Approximately 0.6 acres of this impact estimate includes the footprint of the Original 115-kV Station that will be demolished.
Underground Duct Bank Installation	0.41 (trenching and backfilling) 0.61 (temporary workspace)	Temporary	Assumes duct bank trench widths of 8-feet within approximately 20-foot-wide temporary workspace corridors.
New Transmission Structure Foundations	0.0008 to .002	Permanent	Five new transmission structure foundations are

Activity	Impact Estimate (acres)	Temporary or Permanent Impact?	Description of Work
			proposed. The typical concrete foundations will range in diameter from 7 to 11 feet (39 s.f. to 95 s.f. at each structure location).
Temporary Work Pads	3.47	Temporary	Assumes construction of approximately 150-foot x 150-foot level work pads, on average, at each transition structure location and 100-foot x 100-foot work pads, on average, at structure modification locations.
Tree Removal	0	N/A	No tree removal is proposed.
Staging and Laydown Area	0.61	Temporary	The proposed staging and laydown area is in the same location that was established during construction of the Replacement Station.

The temporarily disturbed areas identified above will be restored with a native seed mix in combination with patchy areas of bare sand to enhance or otherwise maintain the existing rare species habitat cover types in this location. In sum, the land will be used in the same way after the new 345-kV Bourne Station is completed as it is presently used; namely, as the location of a switching station, with overhead and underground electric transmission line infrastructure.

Rare Species Habitat

The entire Project Site is in mapped habitat for state-listed species. The Company has worked closely and collaboratively with MassWildLife's Natural Heritage & Endangered Species Program ("NHESP") for several years regarding other work at the Project Site, including most recently the MidCape Project and the Bourne Switching Station Project, and has consulted with NHESP staff regarding construction of the proposed 345-kV Bourne Station. The new 345-kV Bourne Station avoids and minimizes impacts to state-listed species habitat by: (i) siting the facility predominantly within the footprint of the Original 115-kV Station that will be demolished prior to

the start of construction; and (ii) conducting the ancillary line work in the actively managed ROWs. Side slopes surrounding the new 345-kV Bourne Station will be stabilized with erosion control matting and loam and seed, as appropriate. The duct bank trenching areas will be substantially restored to their preexisting conditions and stabilized with a native seed mix or sandy soil to enhance rare species habitat when construction is complete, and no tree removal is proposed.

In consideration of the above, the NHESP has indicated to the Company that the new 345-kV Bourne Station will likely be conditioned and conducted in a manner to avoid a "Take" of state-listed species and, therefore, will not require a Massachusetts Endangered Species Act ("MESA") Conservation and Management Permit to proceed. As the design details are advanced further, the Company will file a MESA Project Review Checklist with the NHESP to formally confirm same. As part of that submittal, the Company will implement a Turtle Protection Plan during construction. Accordingly, impacts to rare species have been properly minimized.

Visual

The viewshed of the Project Site is already characterized by the presence of the existing overhead transmission lines, the Replacement 115-kV Station, and the Original 115-kV Station within the existing utility ROW and remote area of JBCC. Additionally, given existing topography and existing forested areas, passers-by on Sandwich Road or north of the Cape Cod Canal on Route 6 will not be able to discern any meaningful difference in viewshed in the area from either station work or transmission line work once the new 345-kV Bourne Station is complete. The viewshed of the existing residences located approximately 700 feet northeast of the Project Site will remain unchanged as the wooded buffer in this area will not be disturbed.

Noise

Noise impacts will be temporary in nature and will occur only during construction. The potential for noise impacts from construction is a function of the specific receptors near the Project Site as well as the equipment used and hours of operation. In this case, the potential noise impacts from the work are low given the remoteness of the Project Site within JBCC relative to the nearest abutters. For perspective, as referenced above, the nearest residential neighborhood is located approximately 700 feet to the northeast of the proposed 345-kV Station in the Hobbler Road neighborhood of Bourne. The Original 115-kV Station, which will be demolished, is similarly located approximately 700 feet from this residential neighborhood. The remainder of the Project Site is bordered to the west by Sandwich Road and to the south and east by expansive remote areas of the JBCC.

Construction noise will be generated by preparation of work areas, delivery of materials, station construction and demolition, grading, foundation and monopole construction and line stringing. The Company will implement, where appropriate, construction methods that reduce construction noise. This includes using construction equipment of the latest design, which generally has equipment to minimize engine noise. Construction will comply with state law (G.L. c. 90, § 16A) and MassDEP regulations (310 CMR 7.11(1)(b)), which limit vehicle idling to no

more than five minutes with permissible exceptions for vehicles being serviced, vehicles making deliveries that need to keep their engines running and vehicles that need to run their engines to operate accessories. Only necessary equipment will run during construction to minimize engine noise. Once constructed, there will be no operational noise generated by the reconstituted transmission lines or the new 345-kV Bourne Station.

Lighting

Like the Replacement 115-kV Station, the new 345-kV Bourne Station will have permanently installed lighting that will normally be left off unless there is work being conducted in the station or in cooperation with law enforcement officials / Army National Guard ("ARNG") in the event of a security threat. Lighting will be of the type that provides "down light" for work at or near grade level and "up" light to allow for visualization of switches. These lights are used only for switching station repair activities and are necessary for worker safety. While such repairs are infrequent, they must be completed quickly and safely. Under normal conditions, the stations are not lighted at night.

During construction, it is anticipated that work will be performed only during daylight hours. Temporary lighting may be necessary for overnight work in very limited instances.

Construction Traffic

The Project Site is in a remote section of ROW within the JBCC and is not located on, nor does it cross over, a public roadway. Therefore, no roads will be closed during construction of the Bourne Project. There may be situations when Sandwich Road must be temporarily blocked for a short duration to accept supplies or move larger pieces of equipment onto the Project Site. These situations will be infrequent and of short duration. In cases where traffic must be temporarily delayed, a police detail will be used to control traffic. During construction, vehicles will be working within the property boundary and only limited entry and exiting of these vehicles will occur. A police detail will be utilized, as necessary, to control traffic entering and exiting the work zone onto Sandwich Road. All truck loads will be covered with a tarp during transport. Truck traffic will either head east on Sandwich Road to the Sagamore Bridge towards Route 3 North, or west on Sandwich Road to the Bourne Bridge towards Route 495. Given the proximity of these bridges and adjacent highways, significant congestion, or disruptions to traffic patterns because of truck traffic on local roads is not anticipated. The Company will coordinate with the Town of Bourne to ensure that traffic impacts are minimized.

Electric and Magnetic Fields ("EMF")

EMF in the vicinity of electric station equipment will be near background levels beyond the station fence, except where transmission lines cross the Project Site. Because the transmission lines in this area already exist (segments are simply transitioning from an overhead line design to an underground line design), the new 345-kV Bourne Station equipment will have an insignificant effect on the existing EMF. Similarly, because all new station equipment will be GIS (which will

include grounded metal enclosures around the conductive bars of the GIS) and underground cable (except for the immediate connections), there will be no incremental electric fields resulting from the new station equipment. Moreover, the new 345-kV Bourne Station will be constructed predominantly within the footprint of the Existing Station that will be demolished prior to the start of construction. As noted above, the nearest residential neighborhood is located approximately 700 feet to the northeast of the 345-kV Station in the Hobbler Road neighborhood of Bourne. The remainder of the Project Site is bordered to the west by Sandwich Road and to the south and east by expansive remote areas of the JBCC. A report, prepared by Exponent, Inc., on behalf of the Company, and provided as Attachment H, summarizes the Company's calculations of the magnetic fields for the proposed 345-kV Bourne Station and ancillary line work. EMF levels associated with Project work will be negligible at the 345-kV Bourne Station property boundary. As a result, EMF levels will be essentially unchanged at the closest residences, and the resulting levels will be far below health-based standards established by ICNIRP.

Air Quality

The main sources of potential construction-related air quality impacts are emissions from construction equipment, motor vehicles and fugitive dust emissions from disturbed soil surface areas. Construction contractors will be contractually required to adhere to all applicable regulations regarding control of dust and emissions. All diesel-powered non-road construction equipment with engine horsepower ratings of 50 and above to be used for 30 or more days over the course of construction will have USEPA-verified (or equivalent) emission control devices, such as oxidation catalysts or other comparable technologies (to the extent that they are commercially available) installed on the exhaust system side of the diesel combustion engine. In addition, vehicle idling will adhere to the Massachusetts Anti-idling law, G.L. c. 90, § 16A, G.L. c. 111, §§ 142A – 142M, and 310 CMR 7.11. Dust generated from earthwork and other construction activities will be controlled by spraying with water. If necessary, other dust suppression methods will be implemented to ensure minimization of the off-site transport of dust. There also will be regular sweeping of the pavement of adjacent roadway surfaces (Sandwich Road) during the construction period to minimize the potential for vehicular traffic to kick up dust and particulate matter. As necessary, a sediment tracking pad and gravel construction entrance will be installed at the site entrance near Sandwich Road to minimize the tracking of sediment onto Sandwich Road and to minimize dust generated by construction traffic entering and exiting the Project Site.

Construction Stormwater Runoff

A Storm Water Pollution Prevention Plan ("SWPPP") will be developed for the new 345-kV Bourne Station work to comply with the Environmental Protection Agency ("EPA") National Pollutant Discharge Elimination System ("NPDES") General Permit for Storm Water Discharges from Construction Activities (also known as the Construction General Permit). The SWPPP will include a construction personnel contact list, a description of proposed work, storm water controls and spill prevention measures, and inspection practices to be implemented for the management of construction-related storm water discharges from the Bourne Project (including any necessary

dewatering activities). Implementation of the SWPPP will incorporate sedimentation and erosion control measures and other BMP from Eversource's BMP Manual for Massachusetts and Connecticut (2022). The SWPPP will identify the areas where erosion and sediment controls are required and the types of erosion and sediment controls to be used (e.g., silt fence, haybales, straw wattles, construction entrance/exit, silt sack) to reduce the potential for offsite erosion. Moreover, the new 345-kV Bourne Station will be constructed in accordance with the Environmental Management Commission's ("EMC") Environmental Performance Standards dated July 11, 2007,[13] including but not limited to no new untreated storm water discharges.

Spill Prevention

The new 345-kV Bourne Station is not located in the Town of Bourne Groundwater Protection Overlay District, MassDEP Approved Zone I, Interim Wellhead Protection Areas (Zone II) or Freshwater Recharge Areas (Cape Cod Commission). According to MassGIS, the nearest public water supply well is located nearly 7,000 feet to the north on the opposite side of the Cape Cod Canal. The nearest small volume well on JBCC is located more than 6,000 feet to the southeast. An aerial photograph showing water resources relative to the Project Site is provided in Attachment F.

The Company will develop site-specific pollution prevention plans associated with re-fueling during construction. At a minimum, proper spill containment gear and absorption materials will be maintained for immediate use in the event of any inadvertent spills or leaks. The fuel transfer operation will be conducted by an operator knowledgeable of the location and use of the work zone spill kit. No liquid or solid wastes or fuels will be deposited on the ground. To facilitate the immediate clean-up of spilled fuels, the contractor will have an adequate supply of suitable absorbent material and any other supplies and equipment necessary to immediately clean-up inadvertent waste or fuel spills. The contractor will have available at all locations where work is taking place a spill kit containing a covered 55-gallon drum, a supply of an oil absorbent solid such as Speedi-dri™, oil-dry or other similar material, a shovel and a yard brush, along with absorbent pads, pillows or sausages. Heavy diesel equipment and fuel transfer vehicles will have a supply of absorbent pads and a five-gallon bucket.

Cultural and Archaeological Resources

A Project Notification Form ("PNF") was previously filed with the Massachusetts Historical Commission ("MHC") for earlier phases of construction on the Project site (including demolition of the Original 115-kV Station, construction of the Replacement 115-kV Station, and related line work associated with the MidCape Project). The MHC has thus previously determined that work at the Project Site is unlikely to affect significant historic or archaeological resources.

[13] Environmental Performance Standards are a set of standards specifically created through the Massachusetts Environmental Policy Act process and implemented by the EMC to protect the resources in the JBCC.

Solid and Hazardous Waste

To determine the potential for encountering soils contaminated from historical release or former land development practices during excavation of the new 345-kV Bourne Station and related line work, the MassDEP reportable release database was reviewed for spills at sites located within 300 feet of the Project Site. There were no releases reported within 300 feet of the Project Site. In the event there is contaminated soil or other regulated materials encountered during the line work or construction of the 345-kV Station, soils will be managed pursuant to the Utility Release Abatement Measure ("URAM") provisions of the Massachusetts Contingency Plan ("MCP"). Eversource will contract with a Licensed Site Professional ("LSP") as necessitated by conditions encountered, consistent with the requirements of the MCP at 310 CMR 40.0460 et seq.

Conclusion on Environmental Impacts

Based upon the analysis provided above, the environmental impacts associated with the Bourne Project are minor and/or temporary and will be minimized to the maximum extent possible.

D. Uprate the Summer Long-Time Emergency ("LTE") Rating of the 399 Line

In conjunction with the construction of the new 345-kV Bourne Station, Eversource must uprate the summer LTE rating of Line 399 (from the new 345-kV Bourne Station to 345-kV Carver Substation) to 1,200 MVA or above. This is because the PCW SIS identified that the loading on Line 399 between the proposed new 345-kV Bourne Station and 345-kV Carver Station is expected to be around 1,200 MVA under various N-1 conditions. As a result, the LTE rating of this line section is required to be 1,200 MVA or above. The existing Line 399, which currently bypasses the existing 115-kV Bourne Station, will be sectionalized and connected to the new 345-kV Bourne Station once constructed. As part of the line work necessary to connect Line 399 to the new 345-kV Bourne Station, the conductor to be used for that work will have a thermal rating of at least 1,293 MVA, which is sufficient to meet the need identified in the SIS. No additional line work beyond the work described above is needed to accomplish this uprate.

V. Stakeholder Outreach

The Company has been in communication with municipal officials and affected abutters in Bourne, Sandwich, and Barnstable throughout the development of the Project. As a part of the Company's initial outreach efforts on the MidCape Project, the Noticed Variation was presented to municipal officials and the public explaining that, in anticipation of future needs, the Company was exploring the option of building the New Line so that it could support 345-kV operation.

The Project team began conducting start-of-construction outreach for the MidCape Project during the week of February 13, and will continue through the end of February 2023. As a part of that effort, field outreach representatives are addressing the planned Notice of Project Change that will change the operation of the New Line from 115 kV to 345 kV. For abutting property owners that are not present during door-to-door outreach, a letter explaining the Project need and

anticipated filing of the Notice of Project Change was provided. Targeted outreach efforts to abutters will be ongoing throughout the life of the Project.

To include expanded abutting property owners and account for seasonal residents, the Company will send a notice letter of the filing after it has occurred. In addition to the above, the Company plans to utilize the following methods to engage with the community, foster public participation, and solicit feedback:

- **WEBSITE:** The Company is developing a Project website, where basic Project information, maps, regular updates, and contact resources will be stored. This will be kept up to date for the life of the Project.

- **OPEN HOUSE/S:** In April of 2023, the Company will host a public Open House to discuss the Notice of Project Change, including its scope, need and anticipated timeline. Subject matter experts will be present to answer questions from the public. Postcard invites will be sent to all property owners within 300 feet of the Project, and it will be advertised in coordination with the towns on municipal outlets, as well as through local news outlets. Additional community pop-up events and open houses will be scheduled as necessary.

The Company will continue outreach efforts throughout the life of the Project. All informational materials will include the dedicated toll-free hotline number (1-833-836-0302), email address (ProjectInfoMA@Eversource.com), and web address with a QR code to the Project website.

VI. Additional Permits Required

As set forth in the table below, several federal and state agencies and programs will also review these project changes to ensure that impacts associated with the work are properly addressed and mitigated to the extent practicable. The Company will also continue to work proactively with JBCC officials to ensure that any issues of concern relating to the new 345-kV Bourne Station and related line work are properly addressed.

Regulatory Agency	Program and Permit	Jurisdiction	Status
Massachusetts Executive Office of Energy & Environmental Affairs ("EEA")	Massachusetts Environmental Policy Act ("MEPA") – Advisory Opinion	As was described in the Environmental Notification Form ("ENF") filed with EEA for the Project (EEA No. 16118), the Company indicated it would consult with the MEPA Office to the extent there were additional environmental impacts associated with the operation of the MidCape Project at 345-kV beyond that described in the ENF and, as necessary, consult with the MEPA Office regarding the need for subsequent filings.	In consultation with the MEPA office, on February 22, 2023, the Company submitted an Advisory Opinion under 301 CMR 11.01(6) documenting that the proposed changes to the Project are insignificant in terms of their environmental consequences such that no further MEPA review is required. MEPA's review of the submittal is ongoing.
Massachusetts Division of Fisheries and Wildlife	NHESP MESA Project Review Checklist and Conservation and Management Permit, as necessary	Work in mapped Priority Habitat for State-listed Species.	MESA Checklist filing anticipated in Q3 2023. Based on recent consultations with the NHESP staff, the Company anticipates that the Bourne Project will be conditioned and conducted in a manner to avoid a "Take" of state-listed species and, therefore, will not require a MESA Conservation and Management Permit to proceed.
U.S. Environmental Protection Agency ("USEPA")	Coverage under National Pollutant Discharge Elimination System ("NPDES") Stormwater Construction General Permit	Land disturbance >1 acre	A Notice of Intent ("NOI") will be filed with USEPA approximately 14 days prior to the start of construction in Q4 2024.

****

The project changes described herein further the Siting Board's statutory mandate to ensure that the MidCape Project operating at 345 kV will contribute to a reliable energy supply consistent with the minimization of environmental impacts and costs. Consistent with ISO-NE's analysis in the SIS, these project changes are required to allow the PCW Project to be interconnected to the

regional energy grid in a safe and reliable manner. Based on the detailed analysis included herewith, and consistent with the Siting Board's Final Decision in EFSB 19-06, the Company respectfully requests that the Siting Board approve the Company's proposed project changes as expeditiously as possible.

Please contact me if you have any questions regarding this filing or require any additional information. Thank you for your attention to this matter.

Respectfully Submitted,

NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY

David S. Rosenzweig, Esq.
Michael J. Koehler, Esq.
Keegan Werlin LLP
99 High Street, Suite 2900
Boston, MA 02110
(617) 951-1400

Enclosures

cc: Service List, EFSB 19-06/D.P.U. 19-142/19-143
Service List, EFSB 10-2/D.P.U. 10-131/10-132
Joan Foster Evans, General Counsel
Andrew Greene, EFSB Director