

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

PRELIMINARY INFORMATION REQUESTS FROM THE  
DEPARTMENT OF PUBLIC UTILITIES TO  
WESTFIELD ESS, LLC  
D.P.U. 24-151  
JANUARY 15, 2025

**Instructions**

The following instructions apply to this set of Information Requests and to all subsequent Information Requests issued by the Department to any party in this proceeding. The instructions apply equally to any set of Information Requests issued by any of the parties.

1. The caption to each Information Request response should include: a verbatim recitation of the Information Request; the Request number; the docket number of the case; the date of the response; and the name of the person responsible for the response.
2. In addition, all Information Request responses must be submitted in a *searchable* electronic file format unless permission to submit the responses in some other form is obtained from the Hearing Officer before the responses are submitted.
3. For easier archiving purposes on the Department of Public Utilities' Electronic File Room, each Information Request should be submitted as *separate* electronic files, *as well as* compiled as a single electronic file. The individual response filename should be identical to the information request number (e.g., information request DPU-G-1 should have a response with a filename "DPU-G-1" – and no other text).
4. Provide all data, assumptions, and calculations relied upon in generating the response. Provide the source of, and basis for, all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions about data were drawn, as well as support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting documentation.
5. Responses must be filed on or before two weeks from the date that these Information Requests are issued. If a particular response cannot be completed by the required date, a brief written explanation, together with the expected date of filing, should be provided at the time the responses are filed.
6. The Information Requests and any Record Requests solicited during evidentiary hearings are continuing in nature. Thus, if a party responds to a Request, and later receives or generates additional information that also is responsive to the Request, a Supplemental Response containing that information *must* be filed. This obligation continues until the hearing record is officially closed and the Department issues a Final Order.
7. When including attachments, supplements or revisions to responses, use the following numbering conventions:

For attachments: DPU-A-1(1) for attachment 1; DPU-A-1(2) for attachment 2, etc.

For supplemental responses: DPU-A-1(S1) for the first supplemental response; DPU-A-

1(S2) for the second supplemental response, etc.

For revisions: DPU-A-1(R)

8. For all maps, please include a north arrow, an accurate scale that clearly captures the subject and relevant context, a detailed legend that provides a clear understanding of the visual content on the map, the source of the data, and the date the map was published, if applicable.
9. If a particular Information Request appears unclear or ambiguous, a party or parties may contact the Hearing Officer for clarification.
10. Please serve a copy of Information Request responses on all parties to and limited participants in the proceeding by electronic mail, unless the party or limited participant requests some other means of service.
11. For the electronic version of the responses, send the responses by e-mail attachment to the following email addresses, in addition to the email attachments sent to all parties:  
  
[Dpu.efiling@mass.gov](mailto:Dpu.efiling@mass.gov)  
[joan.evans@mass.gov](mailto:joan.evans@mass.gov)  
[andrew.greene@mass.gov](mailto:andrew.greene@mass.gov)  
[yonathan.mengesha@mass.gov](mailto:yonathan.mengesha@mass.gov)  
[timothy.j.reilly@mass.gov](mailto:timothy.j.reilly@mass.gov)  
[donna.sharkey@mass.gov](mailto:donna.sharkey@mass.gov)  
[nathaniel.strosberg@mass.gov](mailto:nathaniel.strosberg@mass.gov)  
[wayne.wang@mass.gov](mailto:wayne.wang@mass.gov)
12. The text of the e-mail must specify: (1) the docket number of the proceeding (D.P.U. 24-151); (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document. The electronic filing should include the name, title, and telephone number of a person to contact in the event of questions about the filing. All documents submitted in electronic format will be posted on the Department website, at: <https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber/24-151>.

Please respond to these questions no later than January 29, 2025.

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- DPU-P-1 Refer to the Petition at 8 (Figure 2). In its alternative site evaluation process, did the Company consider reducing the size of the BESS facility on Candidate Site 3 (Parcel ID 70R-17) to limit the footprint of the Project such that none of the facility structures is located in the DEP Zone II wellhead protection area at Candidate Site 3? Please provide a revised site plan with a site facility layout that excludes structures in the Zone II resource area and identifies groundwater and wetland resources on the site plan. Provide a complete explanation of any benefits and limitations of this site layout, specifically in terms of contamination risk with respect to groundwater and wetland resources in the event of a facility emergency resulting in release of contaminants and fire suppressants (e.g., water). Provide the Company's evaluation of this alternative.
- DPU-P-2 Refer to the Petition at 8 (Figure 2) and 16 (Figure 5). Provide an alternative site plan which moves all (or some) of the portion of the proposed BESS currently slated for Candidate Site 3 to Candidate Site 4 (Parcel ID 70R-1), as your analysis indicates that the vast majority of Candidate Site 4 is not above a Zone I or II groundwater resource area. Please provide a revised site plan with site facility layout and groundwater and wetland resources identified. Under this scenario, would the revised site plan overlap with any identified DEP Zone I or II groundwater resource areas or wetland areas? Provide the Company's evaluation of this alternative.
- DPU-P-3 Refer to the Petition at 8 (Figure 2) and 16 (Figure 5). The analysis provided by the Company indicates that Candidate Site 5 (Parcel ID 70R-1-1A) has no identified wetlands or groundwater resource areas. The Company states that the parcel was not commercially available from the owner at the time of outreach (Petition at 23). Identify the timing of the outreach and the details of those discussions. If Candidate Site 5 is available, please provide a revised site plan layout with site facility and sensitive resources identified at or abutting this site. If the Company would not consider Site 5, why not?
- DPU-P-4 Has the Company conducted a hydrogeological analysis which characterizes subsurface water flow at the five candidate sites? If so, please provide the hydrogeological site characterization, including a map(s) of subsurface flow vectors. If not, please explain what would be required to provide such an analysis.
- DPU-P-5 In comments received at and after the December 5<sup>th</sup> Westfield Public Comment Hearing, one of the items addressed is the potential for a fire at the proposed BESS facility and the subsequent run-off of firefighting water ("firewater")

migrating into the ground, potentially contaminating the underlying aquifer. Has the Company considered the development of a Firewater Containment Plan outlining a series of measures to limit the potential for damage associated with firewater during and following a fire, and corresponding firewater containment strategies? If so, please explain the Company's firewater containment planning and containment strategies and identify alternative methods of fire suppression which may be available.