

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

Petition of NSTAR Electric Company	)	
d/b/a Eversource Energy for Zoning Exemptions	)	
Pursuant to G.L. c. 40A, § 3 from the Operation	)	
of the Zoning Bylaw of the Town of Blandford	)	

EFSB 25-09

**INITIAL BRIEF OF
NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY**

Submitted by:

Catherine J. Keuthen, Esq.
Cheryl A. Blaine, Esq.
Keegan Werlin LLP
One Cranberry Hill, Suite 304
Lexington, MA 02421
(617) 951-1400

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I. INTRODUCTION

On June 24, 2025, NSTAR Electric Company d/b/a Eversource Energy (“Eversource” or the “Company”) filed a petition with the Energy Facilities Siting Board (the “Siting Board”) pursuant to the provisions of G.L. c. 40A, § 3 (“Petition”) requesting that it grant individual and comprehensive zoning exemptions from the operation of the *Zoning By-Laws, Town of Blandford, Massachusetts* (“Zoning Bylaw”) in connection with the expansion of Eversource’s Blandford Substation 19J (“Blandford Substation”) located at 79 North Blandford Road in the Town of Blandford (“Substation Site” and “Substation Expansion”). Exh. EV-1.

The Project is a component of Eversource’s Capital Investment Project (“CIP”) that Eversource submitted to the Department of Public Utilities (“Department”) for review in accordance with the Department’s directives in its Order on Provisional System Planning Program, D.P.U. 20-75-B (2021) (“Provisional Program”). Exh. EV-1, at 2. The goal of the Provisional Program is to ensure the expeditious installation of electric power system (“EPS”) upgrades to enable the construction of solar and energy storage system projects currently in the interconnection queue that have not been able to move forward because of the high cost of interconnection.¹ Order on Provisional System Planning Program, D.P.U. 20-75-B at 2.

Pursuant to the Provisional Program, Eversource filed a petition with the Department on April 29, 2022, seeking approval of a CIP proposal to enable new DG resources to interconnect to the Company’s transmission and distribution system in the Plainfield-Blandford area (“Plainfield-Blandford CIP”), docketed as D.P.U. 22-52. Exh. EV-1, at 2. The Plainfield-Blandford CIP

¹ These projects are referred to as both distributed generation (“DG”) facilities and distributed energy resources (“DER”). They are facilities that must apply under a Distribution Company’s Standards for the Interconnection of Distributed Generation Tariff, regardless of whether the interconnection facility actually generates electricity, including certain types of solar and energy storage systems. Order on Provisional System Planning Program, D.P.U. 20-75-B at 1, n.2. The terms DG and DER are used interchangeably herein.

identified various upgrades and additions, including the Substation Expansion, which are necessary to safely and reliably interconnect DG resources to the Company's EPS in the Plainfield-Blandford area ("Plainfield-Blandford Group Upgrades"). Id. The Department approved the Plainfield-Blandford CIP, subject to certain modifications, in NSTAR Electric Company d/b/a Eversource Energy, D.P.U. 22-52 (2024) (the "Blandford Order").

To ensure expeditious implementation of upgrades proposed and approved in CIPs, the Department imposed a four-year deadline within which transmission companies must permit, construct and bring into operation approved upgrades. Order on Provisional System Planning Program, D.P.U. 20-75-B at 39. For the Plainfield-Blandford Group Upgrades, which includes the Blandford Substation Expansion, that four-year deadline concludes on June 24, 2028.² Exh. EV-1, at 4. The Company has used its resources efficiently and made all commercially reasonable efforts to avoid undue delays in designing the Substation Expansion and preparing and filing the Petition, all of which occurred within nine months of the start of the four-year period ("construction window"). Id. The Company estimates it will take approximately 18 months to complete construction of the Blandford Substation Expansion, which provided at the time of the filing approximately 18 months to obtain all permits and approvals needed for the start of construction (including the Siting Board's grant of the zoning exemptions requested herein) and to complete the procurement process. Id.

The Project satisfies the standards for the grant of exemptions pursuant to G.L. c. 40A, § 3

² In D.P.U. 20-75-B, the Department stated: "the Department's adjudicatory process includes completion of the adjudicatory proceeding, issuance of a final Order, ruling on any post-Order motions, and ruling on any judicial appeal." Order on Provisional System Planning Program, D.P.U. 20-75-B at 39, n.41. The Department approved the Plainfield-Blandford Group CIP with the issuance of a Final Order on June 4, 2024. G.L. c. 25, § 5 provides a 20-day window to file a petition for appeal with the Department. No petitions for appeal were filed with the Department and, accordingly, the Blandford Order became final at the conclusion of the 20-day appeal period, on June 24, 2024. Four years from that date establishes the required end date of the construction window – June 24, 2028.

because the Project is needed immediately and will serve the public interest by: (1) maintaining a reliable electric system; (2) enabling DG facilities currently seeking interconnection to safely and reliably interconnect and operate; (3) enabling future DG applicants to interconnect; and (4) facilitating future load growth due to electrification. Accordingly, the Company respectfully requests expeditious approval of the Project and the grant of the requested zoning exemptions under G.L. c. 40A, § 3 to support timely completion of the Project within the four-year construction window established in D.P.U. 20-75-B. The Project also meets the standards for Siting Board approval pursuant to G.L. c. 164, § 69H.

II. PROCEDURAL HISTORY

A. Public Notice Requirements

On June 24, 2025, as part of the Company's initial filing, a copy of the Petition was sent to the Town Clerk's Office in the Town of Blandford ("Town"). Exh. EV-14. On January 9, 2026, the Siting Board issued a Notice of Adjudication/Notice of Public Comment Hearings (the "Notice") with an accompanying letter prescribing mailing, posting and publication requirements for the Notice (the "Publication Letter"). The Notice established: (1) a hybrid public comment hearing date of February 3, 2026, at the Blandford Town Hall; and (2) a deadline of February 18, 2026, for filing petitions for leave to intervene and for limited-participant status in the adjudicatory proceeding, and written comments. The Company complied with all the publication, posting, and service requirements set forth in the Publication Letter and subsequent instructions from the Presiding Officer. Exh. EV-14.

B. Site Visit and Public Comment Hearing

The Siting Board conducted a site visit at the Blandford Substation on February 3, 2026. A hybrid public comment hearing was held in person and virtually later that day at the Blandford Town Hall.

C. Intervention and Participation

The Town moved to intervene as a party within the intervention period and its motion was granted on March 20, 2026.³ Issues raised by the Town include: (1) public safety, emergency response capability and coordination; (2) noise and visual impacts, and construction impacts to residents; (3) environmental impacts including stormwater management and impacts on sensitive natural resources; (4) cumulative impacts associated with related or foreseeable energy infrastructure development; and (5) post-approval oversight, monitoring, and long-term operational responsibilities, including conditions necessary to protect the Town and its residents. Tr. 1, at 17-22.

The Town propounded two sets of information requests and filed a list of requested conditions for consideration by Eversource and the Siting Board. Exh. TOB-55. The Company provided a response to the Town's request for conditions that clarified where in the record the Company had already made commitments to satisfy the requested condition or either provided a timeline for when the Company will be able to provide the requested information or explained why the Company would not be able to comply with the requested condition. Exh. TOB-55; see Section VI.E. below for a list of the commitments the Company has made to the Town with respect to those conditions.

³ The Company did not oppose the Town's request.

D. Evidentiary Hearing and Evidentiary Record

The Siting Board conducted the evidentiary hearing on June 9, 2026. The Company presented a total of 12 witnesses for cross examination by Siting Board staff and the Town:

- Christopher Lombardi, Eversource Project Director
- Hakob Mkrtchyan, Engineering Project Manager, Distribution System Planning/
Distributed Energy Resources Planning
- John Zicko, Eversource Director of Capital Projects Engineering
- Sibtain Hassan, Eversource Senior Engineer
- Nicholas Forzono, Eversource Lead Engineer
- David Askew, Eversource Senior Environmental Specialist
- Aimee Henderson, Supervisor, Eversource Project Engagement
- Katie Baker, Senior Specialist, Eversource Project Engagement
- Sean Mahoney, Eversource Siting Specialist
- John Caldwell, Manager, Eversource Community Relations
- Giuliana Marchetti, Burns & McDonnell, Assistant Project Manager
- Christopher Bajdek, VHB, Director of Noise and Vibration

The Town presented two witnesses, Jaqueline Coury, a Blandford Select Board member and Jason Forgue, the Blandford Building Commissioner/Zoning Enforcement Officer.

Approximately 164 exhibits were entered into the evidentiary record, including the Petition and its attachments, responses to information and record requests and prefiled direct testimony.

III. PROJECT SUMMARY

A. Blandford Substation Expansion

The Substation Site is an approximately 2.8-acre Company-owned parcel of land located at 79 North Blandford Road. Exh. EV-1, at 4. The fenced yard will be expanded from approximately 0.65 acres to approximately 1.13 acres to accommodate new and upgraded equipment. Id.

The Substation Expansion will be conducted in phases so that the Substation will not be taken out of service during construction. Exh. EV-1, at 4-5; Exh. EFSB-N-5. The area surrounding the existing Substation will be graded to support the expansion. Exh. EV-1, at 5. There will be

limited tree removal as part of the site preparation and grading work. Id. After the new equipment is installed, all existing foundations, equipment, and enclosures for the replaced equipment will be removed. Id.

In designing the Substation Expansion, the Company considered the equipment that must be installed to meet the need requirements, the working space needed around each piece of equipment and the construction sequence. Exh. EV-1, at 5; Exh. EFSB-N-7. The size of the expanded Substation is required to accommodate the safe installation of the new equipment, while keeping Eversource customers reliably energized during the construction. Exh. EV-1, at 5. Consistent with the Blandford Order, the scope of work for the Substation Expansion includes the following:

- Replace existing 30 MVA transformer and 25 MVA transformer with two new 115/23 kV 62.5 MVA transformers, each with secondary containment systems.
- Install new foundations, trenching, and conduits.
- Install new 23 kV switchgear enclosure.
- Install two new 115 kV circuit breakers in series to allow for future station expandability.
- Construct a new access driveway off North Blandford Road.
- Install a new galvanized chain-link mesh fence around the expanded area similar in height to existing (approximately eight feet plus one-foot barbed wire).⁴

Id.

B. The Company's Robust Agency and Community Outreach Fosters Public Input.

The Company is committed to working closely with municipal officials in Blandford, community members, and abutters to the Blandford Substation to provide transparent, proactive

⁴ The Blandford Order also approved upgrades to distribution lines connected to Blandford Substation.

communications during permitting, construction and operation of the substation. Exh. EV-1, at 6; Exh. TOB-5; Exh. TOB-55.

The Company's initial outreach efforts were aimed at briefing local officials on the need for the Substation Expansion, the anticipated schedule, potential impacts, and the permitting and siting processes, including opportunities for public input. Exh. EV-1, at 6; Exh. EFSB-PA-3. The Company met with the Blandford Building Commissioner/Zoning Enforcement Officer on March 21, 2025. Id. The Company presented an overview of the work to be performed at the Substation and a preliminary list of zoning relief that would be required for the Substation Expansion. Exh. EV-1, at 6; Exh. EV-5. The Company expressed a preference for seeking local zoning relief but noted that seeking exemptions from the Siting Board was an option; thus, the Company discussed the process for seeking individual and comprehensive zoning exemptions pursuant to G.L. c. 40A, § 3, which includes a variety of procedural requirements and opportunities for participation, including the opportunity to participate in a noticed public comment hearing and for the Town and abutters to participate or intervene in the evidentiary proceeding. Exh. EV-1, at 6; Exh. EV-5. The Building Commissioner/Zoning Enforcement Officer did not express any concern about the possibility that the Company could seek zoning exemptions from the Siting Board rather than local zoning relief. Exh. EV-1, at 7. Given the state's primary role in advancing the Project, as evidenced by the Department's Blandford Order, the Company ultimately concluded that seeking zoning exemptions from the Siting Board was the best and most efficient option to obtain all relief needed to construct the Substation Expansion within the four-year construction window established by the Department in D.P.U. 20-75-B and the Blandford Order. Id. at 6-7; Exh. TOB-46; Tr. 1, at 145-146.

After filing the Petition, the Company met with the Blandford Select Board at a public meeting on July 28, 2025, to present the Project and answer questions from the Select Board members, other Town officials, and members of the public. Exh. EFSB-PA-3; Exh. EFSB-PA-3(1).

Eversource has a detailed outreach plan specific to the Blandford Substation Expansion that is designed to engage the community, foster public participation, and solicit feedback from stakeholders. Exh. EV-6. The Company will continue its outreach in Blandford during the permitting and siting process and will maintain a focused communication program throughout construction, including outreach to municipal officials and abutters regarding construction staging, laydown and traffic management plans, as such details become available. Exh. EV-1, at 7; Tr. 1, at 82-86.

The Company proposes to meet with the Blandford Town Administrator monthly to provide a high-level update on the Substation Expansion, including the following: (1) the status of Project construction; (2) the schedule of activities for the next month including potential traffic disruptions and potential impacts on the residents who live on North Blandford Road; and (3) a report of any complaints received the previous month and the status regarding the Company's response and resolution of the issue. Exh. TOB-36; Exh. TOB-38; Tr. 1, at 82.

During construction, the Project website will serve as a centralized source of information for the Substation Expansion. Exh. EFSB-CM-2; Tr. 1, at 82-83. The Company will provide updates that include: (1) Project purpose and overview, explaining how the Blandford Substation Expansion supports system reliability and accommodates future energy needs; (2) public outreach updates, including materials from community meetings and/or open houses; (3) Project documents and resources, such as maps, fact sheets, presentations, or regulatory submissions; and (4) contact

information for the Project team and channels for public questions or feedback. Exh. EFSB-CM-2; Tr. 1, at 82-83. The Company will update the Project website regularly and at key milestones throughout construction of the Blandford Substation Expansion; specifically: (1) in advance of and following engagement activities, including community meetings or public briefings; and (2) whenever new documents or informational materials are finalized and ready for public access. Exh. EFSB-CM-2. Through the website, the Company will offer the public the ability to sign up for automated notifications related to the Blandford Substation Expansion through an opt-in email notification system. Id.

To facilitate communication, in all its outreach materials including mailings, the website, and at all community events for the Project, Eversource has included and will include its toll-free number, an email address for Massachusetts Projects and the Project website, and the Company's Project Engagement team will address any resident complaints received. Exh. EV-1, at 7; Exh. TOB-2. After the Project is in service, issues can be raised with the dedicated Eversource Community Relations Specialist. Exh. TOB-2.

There are no Environmental Justice ("EJ") populations within the Plainfield-Blandford Group Study area. Exh. EFSB-N-4.

C. Project Construction Schedule and Costs

The Company estimates that it will take about 18 months to complete construction of the Substation Expansion once construction commences. Exh. EV-1, at 5. The Company's objective is to complete construction of the Substation Expansion no later than June of 2028 to meet the four-year construction window established in D.P.U. 20-75-B and the Blandford Order. Id. at 5-6. Based on this schedule, approval by the Siting Board is needed by December of 2026.

The Substation Expansion is estimated to cost \$64.5 million, based on a planning grade estimate with an anticipated level of accuracy of +50/-25 percent.⁵ Exh. EV-1, at 6; Exh. RR-EFSB-1. The estimated cost for the Substation Expansion includes costs for engineering, project management, siting, permitting, materials, construction, and testing. *Id.* The interconnecting DER customers will pay 54 percent of the cost of the Plainfield-Blandford distribution upgrades, including the Project, and native load distribution customers will pay the remaining 46 percent. Exh. EFSB-C-1. Costs associated with the transmission portion of the Project will be borne solely by ratepayers. *Id.* None of the costs borne by native load distribution customers will be eligible for regional cost recovery. Exh. EFSB-C-2.

IV. STANDARD OF REVIEW FOR THE GRANT OF ZONING EXEMPTIONS

G.L. c. 40A, § 3 provides, in relevant part, that:

Land or structures used, or to be used by a public service corporation may be exempted in particular respects from the operation of a zoning ordinance or bylaw if, upon petition of the corporation, the [Siting Board] shall, after notice given pursuant to section eleven and public hearing in the town or city, determine the exemptions required and find that the present or proposed use of the land or structure is reasonably necessary for the convenience or welfare of the public.

A petitioner seeking exemption from a local zoning bylaw under G.L. c. 40A, § 3 must meet three criteria. First, the petitioner must qualify as a “public service corporation.” Save the Bay, Inc. v. Department of Public Utilities, 366 Mass. 667 (1975) (“Save the Bay”); NSTAR Electric Company d/b/a Eversource Energy, EFSB 19-06/D.P.U. 19-142/19-143, at 98 (2022) (“Eversource Mid Cape”); NSTAR Electric Company d/b/a Eversource Energy, D.P.U. 18-155, at

⁵ This total represents \$41 million for upgrades approved in the Blandford Order plus an additional \$23.5 million for other capital projects at the Substation. In addition, the distribution line work necessary to connect the Blandford Group DER will result in an additional cost of approximately \$17.1 million. Exh. EV-1, at 6.

11 (2020) (“Eversource Oak Bluffs”); NSTAR Electric Company d/b/a Eversource Energy, D.P.U. 18-21, at 3 (2019) (“Eversource Westfield”).

Second, the petitioner must demonstrate that its present or proposed use of the land or structure is reasonably necessary for the public convenience or welfare. Eversource Mid Cape at 98; Eversource Oak Bluffs at 11; Eversource Westfield at 3.

Third, the petitioner must establish that it requires the requested zoning exemptions from the zoning ordinance or bylaw. Eversource Mid Cape at 98; Eversource Oak Bluffs at 11; Eversource Westfield at 3-4.

V. EVERSOURCE SATISFIES THE CRITERIA FOR THE GRANT OF ZONING EXEMPTIONS

A. Eversource Is a Public Service Corporation.

A “public service corporation” is defined in relevant part in G.L. c. 40A, § 1A, as amended by St. 2024, c. 239, § 36, as:

a corporation or other entity duly qualified to conduct business in the commonwealth that owns or operates or proposes to own or operate assets or facilities to provide electricity, gas, telecommunications, cable, water or other similar services of public need or convenience to the public directly or indirectly, including, but not limited to, an entity that owns or operates or proposes to own or operate electricity generation, storage, transmission or distribution facilities, or natural gas facilities including pipelines, and manufacturing and storage facilities.

Eversource is an “electric company” as defined in G.L. c. 164, § 1, meaning, it is “a corporation organized under the laws of the commonwealth for the purpose of . . . selling, transmitting, distributing, transmitting and selling, or distributing and selling, electricity within the commonwealth.” As such, because Eversource is an electric company that owns and operates facilities to provide electric service, Eversource qualifies as a public service corporation for the purposes of G.L. c. 40A, § 3 and, therefore, is entitled to seek zoning exemptions pursuant to G.L.

c. 40A, § 3. See Eversource Mid Cape at 100; see also NSTAR Electric Company d/b/a Eversource Energy, EFSB 17-02/D.P.U. 17-82/17-83, at 194 (2019) (“Eversource Sudbury-Hudson”).

B. The Company Has Established that the Substation Expansion Is Reasonably Necessary for the Public Convenience and Welfare.

1. Standard of Review

In determining whether the present or proposed use is reasonably necessary for the public convenience or welfare, the Siting Board must balance the interests of the general public against the local interest. See Save the Bay, 366 Mass. at 685; see also Town of Truro v. Department of Public Utilities, 365 Mass. 407, 410-11 (1974). Specifically, the Siting Board is empowered and required to undertake “a broad and balanced consideration of all aspects of the general public interest and welfare and not merely [make an] examination of the local and individual interests which might be affected.” New York Central Railroad v. Department of Public Utilities, 347 Mass. 586, 592 (1964) (“NY Central Railroad”). When reviewing a petition for a zoning exemption under G.L. c. 40A, § 3, the Siting Board is empowered and required to consider the public effects of the requested exemption in the State as a whole and upon the territory served by the applicant. See Save the Bay, 366 Mass. at 685; see also NY Central Railroad, 347 Mass. at 592.

Therefore, when determining whether a petitioner’s present or proposed use is reasonably necessary for the public convenience or welfare, the Siting Board examines: (1) the need for, or public benefits of, the present or proposed use; (2) the present or proposed use and any alternatives or alternative sites identified; and (3) the environmental impacts or any other impacts of the present or proposed use. The Siting Board then balances the interests of the general public against the local interest and determines whether the present or proposed use of the land or structures is reasonably necessary for the convenience or welfare of the public. Eversource Mid Cape at 100-01; Eversource Oak Bluffs at 13; Eversource Westfield at 6.

When demonstrating the need for a proposed transmission facility based on reliability considerations, a petitioner applies its established planning criteria for construction, operation, and maintenance of its transmission and distribution system. NSTAR Electric Company d/b/a Eversource Energy, EFSB 22-03/D.P.U. 22-21, at 15 (2024) (“Eversource Cambridge”); Eversource Mid Cape at 10; Eversource Sudbury Hudson at 15. Compliance with the applicable planning criteria can demonstrate a “reliable” system. Eversource Cambridge at 15; Eversource Mid Cape at 10; New England Power Company d/b/a National Grid, EFSB 19-04/D.P.U. 19-77/19-78, at 10 (2021) (“NEP Beverly Salem”).

To determine whether new electric infrastructure is needed, the Siting Board: (1) examines the reasonableness of the Company’s system reliability planning criteria; (2) evaluates whether the Company uses reviewable and appropriate methods for assessing system reliability over time based on system modeling analyses or other valid reliability indicators; and (3) determines whether the relevant transmission and distribution system meets these reliability criteria over time under normal conditions and under certain contingencies, given existing and projected loads. Eversource Cambridge at 15-16; Eversource Mid Cape at 10; NEP Beverly Salem at 10; see also Town of Sudbury v. Energy Facilities Siting Board, 487 Mass. 737, 748-749 (2021) (“Town of Sudbury”).

When a petitioner’s analysis of system reliability and facility requirements is driven, at least in part, by load projections, the Siting Board reviews the underlying load forecast. Eversource Cambridge at 16; Eversource Mid Cape at 10; Eversource Sudbury Hudson at 15. The Siting Board requires that forecasts be based on substantially accurate historical information and reasonable statistical projection methods that include an adequate consideration of conservation and load management. Eversource Cambridge at 16; Eversource Mid Cape at 10; Eversource Sudbury Hudson at 15. To ensure that this standard has been met, the Siting Board requires that forecasts

be reviewable, appropriate, and reliable. Eversource Cambridge at 16; Eversource Mid Cape at 10; Eversource Sudbury Hudson at 15. A forecast is reviewable if it contains enough information to allow a full understanding of the forecast method; a forecast is appropriate if the method used to produce the forecast is technically suitable to the size and nature of the company to which it applies; and a forecast is considered reliable if its data, assumptions and judgments provide a measure of confidence in what is most likely to occur. Eversource Cambridge at 16; Eversource Mid Cape at 10-11; Eversource Sudbury Hudson at 15.

In making its need determination, the Siting Board is also guided by precedent from the Supreme Judicial Court (the “SJC”), which underscores the importance of the Siting Board’s statutory mandate to ensure a reliable supply of electricity:

State law makes it clear that the residents of the Commonwealth simply cannot be exposed to foreseeable and avoidable power outages. See St. 1997, c. 164, § 1 (h) (Electric Utility Restructuring Act) (“reliable electric service is of utmost importance to the safety, health, and welfare of the commonwealth’s citizens and economy”). See also St.1997, c. 164, § 1 (a) (“electricity service is essential to the health and well-being of all residents of the commonwealth, to public safety, and to orderly and sustainable economic development”). If government and industry fail to properly plan and act to timely address our energy needs, enormous suffering can result.

Town of Sudbury, 487 Mass. at 749.

As described in the following sections, the Company amply demonstrates a clear and compelling need for the Substation Expansion to address system reliability, including for the interconnection of DG, in accordance with well-established standards and precedent. Because the record shows that need for the Project on balance outweighs identifiable adverse local impacts associated with its construction and operation, the Project is reasonably necessary for the convenience or welfare of the public.

2. The Project Is Needed to Comply with Applicable National, Regional, and Company Reliability Standards and Criteria for Transmission and Distribution System Planning.

The Company must operate its transmission and distribution systems in compliance with the following planning and engineering standards.

Reliability standards and criteria developed by the North American Electric Reliability Corporation (“NERC”), the Northeast Power Coordinating Council (“NPCC”) and the Independent System Operator-New England (“ISO-NE”) require that transmission operators design, test and operate their systems to withstand representative contingencies and plan and implement system additions and upgrades to address the identified inadequacies. Exh. EV-1, at 13-14. These standards provide limits for voltages and loading and if identified criteria violations are not addressed, there is a risk that transmission equipment could become overloaded and voltage levels could be outside of acceptable operating ranges under certain system conditions. *Id.*

Eversource’s Transmission System Design and Analysis Guideline (“TSDAG”) describes the current standards, criteria, and assumptions used for planning the Eversource transmission system in New England, which are consistent with those established for the interconnected bulk power system by the Federal Energy Regulation Commission, NERC, NPCC, and ISO-NE, all requiring that the transmission system be designed with sufficient transmission capacity to serve area loads in the event of an N-1 contingency or an N-1-1 contingency (a second contingency following an initial contingency).⁶ Exh. EV-1, at 14.

Eversource’s Bulk Distribution Substation Assessment Procedure, known as SYS-PLAN 010, establishes the guidelines for the planning and design of the Company’s bulk substation and

⁶ “N-1” refers to loss of a single transmission element and is a contingency planning standard that requires, for situations in which Company EPS equipment is out of service, that customers do not lose electric service. N-1-1 refers to a second contingency following an initial contingency.

distribution facilities, and sets forth reliability criteria by which the capacity and reliability performance of the Company's supply systems is gauged, and how these assessments are conducted. Exh. EV-1, at 14; Exh. EV-7.

Eversource's Distribution System Planning Guide ("DSPG") outlines the planning criteria, design and analysis methods and engineering rationale for effectively expanding the distribution system to meet demand and sets forth standards for distribution system design and system studies including loading criteria, equipment ratings, system voltages, power quality, reliability, standard substation designs, secondary network criteria, evaluation of the interconnection of DER, system modeling criteria, load forecasting, system study methodologies, and modeling assumptions. Exh. EV-1, at 15; Exh. EFSB-PA-1(2). The DSPG includes procedures for evaluating N-1 contingencies applied to bulk substation equipment and substation distribution tie-lines to assure that in the event of the loss of any one of the applicable EPS equipment components, customers would not lose electric service. Id.

The Eversource tariff, "Standards for Interconnection of Distributed Generation" M.D.P.U. No. 55A ("DG Interconnection Tariff"), sets forth the process and requirements for the interconnection of DER into Eversource's electric power grid. In accordance with the DG Interconnection Tariff, the Company performs system impact studies to ensure the safe and reliable interconnection of DG resources to Eversource's EPS. Exh. EV-1, at 15-16.

The Eversource Distributed Energy Resources Planning Guide ("DERPG") describes the planning criteria and analyses that are used to study the impacts of DG seeking to interconnect to the Company's EPS to ensure that DG does not degrade the safety, performance or reliability of the EPS. Exh. EV-1, at 16; Exh. EV-8.

3. The Project Is Needed to Maintain a Reliable Energy Supply in the Plainfield-Blandford Area.

a. The Existing Transmission and Distribution System

Blandford Substation, as well as two distribution transformers and a distribution/feeder line system, were the subject of the Plainfield-Blandford CIP Proposal and upgrades to the Blandford Substation were approved in the Blandford Order. Exh. EV-1, at 11. Blandford Substation is fed directly from transmission lines that currently collectively serve approximately 24 MW of customer load. Id. Blandford Substation and the interconnecting distribution/feeder line system supply approximately 8,000 customers in the municipalities of Russell, Sandisfield, Otis, Great Barrington, Huntington, Blandford, Westfield, Becket, and Granville. Id.

Blandford Substation is comprised of two 115/23-kV transformers: (1) the 19J-1X transformer has a maximum capacity of 30 MegaVolt Amperes (“MVA”) and the 19J-2X transformer has a maximum capacity of 25 MVA. Exh. EV-1, at 12. The transformers are supplied by two incoming 115-kV transmission lines (#1853 and #1421) and supply two 23-kV bus sections, two station service transformers, and six 23-kV feeders. Id. Currently, Blandford Substation has a total capacity of 55 MVA, firm capability of 30 MVA (N-1 scenario for loss of one transformer), and load carrying capacity (“LCC”) of 36 MVA (which is the station’s firm capability of 30 MVA plus 6 MVA transfer capability). Id. Actual peak load at Blandford Substation in 2024 was 24 MVA, which is 80 percent of the station’s total firm capability and 66.7 percent of the LCC. Id.

Blandford Substation currently serves approximately 16 MW of native customer peak load (i.e., wholesale and retail power customers as distinguished from interconnecting DG facilities). EFSB-N-1. Currently, there is a total of 37 MW of installed ground-mounted large DG (i.e., facilities larger than 15 kW) and less than 1 MW of rooftop (small) DG connected to this

substation. Exh. EV-1, at 12-13.

- b. The Plainfield-Blandford Study Demonstrated that the Existing Transmission System is Insufficient to Safely and Reliably Interconnect DG to the Company's Transmission System.

The Company analyzed system constraints in the Plainfield-Blandford area (“Blandford Study”) system to determine how the interconnection of the DG projects that have applied to interconnect to the Company’s system in the Plainfield-Blandford area (“Group Study DG”) would affect the Company’s transmission and distribution system in the Blandford Study area and what upgrades would be necessary to enable the interconnected DG facilities to remain online under N-1 distribution and transmission contingencies, including after post-contingency transfers. Exh. EV-1, at 17; Exh. EFSB-PA-1; Exh. EFSB-PA-1(1). The primary focus of the Blandford Study was to evaluate the expected impacts of Group Study DG on the system’s steady state voltage and loading, voltage flicker, fault current contribution, interaction with voltage control equipment, and to assess the risk of potential problems for loss of mains detection in the event of islanding conditions. Exh. EFSB-PA-1(1), at 9.

The Blandford Substation is highly saturated with DG (a total of 37 MW of large DG is currently connected). Exh. EV-1, at 17; Exh. EFSB-N-1. In addition, 16 MW of summer peak native customer load is connected to Blandford Substation resulting in zero MW of available bulk substation DER hosting capacity (i.e., the amount of distributed generation a substation can accommodate, assuming one of the transformers at the Substation is off-line either for service or repair). Exh. EV-1, at 17. Group Study DG applicants propose to connect 8 MW to Blandford Substation and to the interconnected distribution system, which would bring the total DER penetration to 454 percent of peak load for the Substation. Id. at 17-18.

The Blandford Study analyzed the connection of Group Study DG, which initially consisted

of an additional 13 MW from three DG projects, but fell to two projects totaling eight MW after one project withdrew from the queue. Exh. EV-1, at 18. DG projects totaling approximately 15 MW from a “Round 2” Blandford Study are seeking interconnection and an additional two MW of DG seeking interconnection is awaiting a system impact study. Exh. RR-EFSB-6.

The Group Study DG cannot be connected to the existing Blandford Substation because, when combined with native load and existing connected DG, the total would exceed the capacity of the station (55 MVA). Exh. EV-1, at 18. Additional DG in-queue behind the Group Study DG would also be unable to connect. Id. Once the Substation Expansion is placed in service, it will enable an additional 40 MW of large DG capacity to connect to the Blandford Substation, which includes current Group Study DG applicant capacity. Exh. EV-1, at 24; Exh. RR-EFSB-6.

c. Transmission and Distribution Systems Are Not Sufficient to Interconnect DG Resources.

The Blandford Study identified multiple 23 kV distribution capacity and voltage issues and demonstrated that, given the current native load and DG connected to the system, the Company cannot connect the in-queue Group Study DG because both existing Blandford Substation transformers would be thermally overloaded under N-0 (normal) and N-1 contingency scenarios. Exh. EV-1, at 18; Exh. EFSB-N-1. The existing 30 MVA transformer would be loaded to 110 percent of its nameplate rating under normal N-0 condition and to 241 percent of its nameplate rating under emergency N-1 conditions. Exh. EV-1, at 18-19; Exh. EFSB-N-1. Similarly, the existing 25 MVA transformer would be loaded to 160 percent of its nameplate rating under N-0 conditions and to 289 percent under N-1 conditions. Id. at 19; Exh. EFSB-N-1.

These thermal overloads would violate the DSPG, which states that a single contingency at a station should not lead to permanent loss of service to a distribution customer and/or a DER customer. Exh. EV-1, at 19. They also would violate SYS-PLAN 010, which requires that: (1) the

transmission system supplying distribution bulk substations be designed such that that no single transmission contingency event results in loss of customer load; and (2) when individual transmission lines provide the supply to more than one bulk transformer, all customer load shall be served in the event of the coincident loss of transformers, after operation of automatic restoral systems or the use of distribution automation capabilities. Id. In addition, the loss of both existing and anticipated DG during specific single contingencies also would violate Section 3.5 of the TSDAG, Consequential Load Loss Guidelines, which has a 0 MW threshold for residual load loss resulting from the loss of a radial, single element serving load. Id.

The Blandford Study identified additional system limitations caused or aggravated by Group Study DG interconnections, including: (1) DER facilities sending power back to substation transformers (reverse flow) where adequate ground fault overvoltage protection is not available; (2) thermal capacity constraints or voltages in excess of the maximum allowable, which can cause damage to utility and/or customer equipment; (3) potential risk of islanding or transient over voltages; (4) excessive fault current on the distribution system, which can cause damage to utility and/or customer equipment; and (5) voltage flicker (rapid changes in system voltages which affects the quality of power for customers) violations and excessive tap operations. Exh. EV-1, at 19-20; Exh. EFSB-N-1. The limitations described in (2) through (5) above constitute violations of various sections of the Eversource DERPG, including: (1) Section 6.1, steady-state thermal and voltage criteria; (2) Section 6.3, Rapid Voltage Change and Voltage Flicker criteria; (3) Section 6.5, Transformer Power Capability; (4) Section 6.6, 3V0 Assessment (Transmission Ground Fault Protection; (5) Section 6.4, Transient Overvoltage and transient analysis; and (6) Section 6.10, Short Circuit Evaluations. Exh. EV-1, at 20.

d. Recent Developments Do Not Diminish the Need for the Project.

The Plainfield-Blandford Group Study originally analyzed three DER facilities totaling approximately 13 MW, however, one applicant, totaling about 5 MW, subsequently withdrew from the queue. Id. Therefore, as reflected in the Blandford Order, the Group Study was designed to interconnect two projects totaling approximately 8 MW. Exh. EFSB-N-2. Since issuance of the Blandford Order, Eversource has received significantly more interconnection interest at the Blandford Substation than what was originally studied in the Plainfield-Blandford Group Study. Id. The Company recently completed Phase Two of the Plainfield-Blandford Group Study, which included nine DER projects totaling approximately 32 MW. Id. Currently, DER projects totaling approximately 15 MW remain in queue from the Phase Two study. Exh. RR-EFSB-6. This activity reflects a substantial increase in total requested DER capacity, demonstrating that system-needs at Blandford Substation have grown beyond the original 8 MW addressed in the Blandford Order. Id.

The current interconnection landscape at the Blandford Substation includes: (1) two DER projects, totaling approximately 8 MW from the initial Group Study; (2) four DER projects, totaling approximately 15 MW from the Phase Two Study; and (3) one approximately 2 MW DER project that is currently in the queue awaiting study. Exh. RR-N-6. The trend shows both ongoing developer interest. The net growth in requested capacity remains substantially well above the 8 MW originally contemplated and demonstrates that current interconnection requests, even after normal attrition, far exceed the assumptions underlying both the original planning and the Blandford Order. Exh. EFSB-N-2.

e. The Substation Expansion Is Needed for the Safe and Reliable Operation of the Transmission System.

If Eversource does not address the impacts of interconnecting additional DG to

interconnected substations in high DG saturated areas, it would result in degradation in service quality for all customers (e.g., thermal overloads, loss of native customer load, loss of DG, and prolonged outages for DG resources in the area), which would undermine the Commonwealth's plans for the short- and long-term reduction of greenhouse gas ("GHG") emissions through development of solar capacity and battery storage. Exh. EV-1, at 20; Exh. EFSB-N-1. Without the Project, the interconnection of Group Study DG would result in service quality impacts and violations of Eversource planning standards. Exh. EV-1, at 20; Exh. TOB-10. DG that is interconnected to the Company's EPS in the Plainfield-Blandford area would be tripped offline and remain offline until the primary transmission system is restored, causing reliability and service quality issues affecting both native load and DG customers. Exh. EV-1, at 20; Exh. EFSB-N-1.

To avoid thermal overloads and the loss of load and DG under N-1 contingencies, the following EPS upgrade projects at Blandford Substation are needed to interconnect the Group Study DG:

- Upgrade the two existing 30 MVA transformers with two new 62.5 MVA transformers,
- Add switchgear, and
- Upgrade distribution lines (overhead and underground conductors) on the Blandford distribution system.⁷

Exh. EV-1, at 21. The upgrades will provide for the interconnection of proposed Group Study DG projects, as well as additional large DG capacity to connect both DG projects currently in the interconnection queue post the Blandford Study as well as future large DG. Id. The Department approved the Plainfield-Blandford CIP and found that the upgrades comprising the Substation

⁷ One additional overhead distribution feeder is necessary to interconnect future DG facilities beyond the Plainfield-Blandford Group Study. The Plainfield-Blandford CIP Proposal also includes transmission upgrades at Blandford Substation, including installation of a 115-kV breaker and bus work, to be recovered by NSTAR Electric through local network transmission rates. Exh. EV-1, at 21.

Expansion are reasonably based on the EPS upgrades identified in the Blandford Study and that the proposed EPS upgrades and cost estimates are reasonable. Id.

f. The Substation Expansions Will Result in Additional Benefits.

In addition to the ability to safely interconnect DG to the Eversource EPS, the Substation Expansion will also benefit distribution customers by improving reliability and enabling future electrification that is needed to meet the Commonwealth's 2050 Decarbonization Goals. Exh. EV-1, at 22; Exh. TOB-10. The Substation Expansion will improve the reliability of all new and existing customers. Exh. EV-1, at 22; Exh. TOB-10. For example, new distribution lines proposed under this solution can be used to create new distribution circuit ties with the overall goal of reducing customer count by zones, which reduces the number of customers affected by feeder or line outages. Exh. EV-1, at 22. Furthermore, additional capacity that is needed to accommodate the Group Study DG also provides additional distribution capacity for customers. Id.

The Substation Expansion, together with the approved distribution line upgrades, will improve electric system reliability for several EJ communities in the Blandford Study area, which supplies approximately 17,000 EJ population customers, and will increase annual energy served from renewable sources in the electric system by approximately 208 percent. Exh. EV-1, at 22.

4. Conclusion on Need

Based on the above, the Project is vitally needed so that existing customer demand and proposed interconnecting DG demand can be served. By facilitating the interconnection of distributed generation facilities that help meet the Commonwealth's clean energy goals, the Project furthers the state's critical objectives of having a reliable and resilient electric supply, at a reasonable cost to customers and distributed generation developers and promoting the development of energy resources that are consistent with the Commonwealth's emission reduction

goals. Exh. EFSB-G-5. Timely achievement of these energy policies is entirely consistent with the statutory standard of public convenience and the public interest. By addressing imminent DG interconnection cost allocation concerns and the robust interconnection of DG, the Project is reasonably necessary for the benefit of the public convenience and welfare.

C. The Project Best Meets the Identified Need Compared to a Range of Possible Alternatives.

Eversource considered several solutions to resolve the above-discussed reliability needs to determine the approach that best balances reliability, cost, and environmental impact. Exh. EV-1, at 23-26. The evaluation involved a combination of engineering judgment, modeling, and simulation to iteratively determine appropriate design changes, and technology and equipment application that would enable safe, reliable interconnection. Id. Solutions that were more costly, unproven or not technically viable were rejected in favor of solutions that could be counted on to reliably integrate as much DG as possible in a cost-effective manner. Id.

1. No Build Alternative

A no-build approach would have no direct environmental or cost implications; however, it would not increase hosting capacity for the Blandford Substation and, therefore, would not provide the ability to connect DG nor enable the Company to reliably meet demand in the event of certain contingencies. Exh. EV-1, at 23. Accordingly, this approach was dismissed from further consideration. Id. at 24.

2. The Preferred Alternative (the Project)

To address thermal loading violations on substation transformers and distribution circuits, Eversource proposes to upgrade Blandford Substation by replacing the existing 30 MVA transformer and 25 MVA transformer with two new 62.5 transformers and adding switchgear (the

Project).⁸ Exh. EV-1, at 24. Replacing the existing transformers eliminates the need to take extended outages on the existing transmission lines, thus removing the need for supplemental generation. Id. The Substation Expansion allows for future expansion to upgrade the 115-kV station to a ring bus, replacement of existing circuit switches, possibly adding a third transformer, and installation of new switchgear, if needed. Id.; Exh. EFSB-N-6. As discussed above, the Project will enable interconnection of an additional 40 MW of large DG capacity once the Substation Expansion is placed in service, which would leave 32 MW of additionally enabled large DG capacity above and beyond the eight MW of proposed Group Study DG projects. Exh. EV-1, at 24. The estimated Project cost is \$64.5 million, based on a planning grade estimate with an anticipated level of accuracy of +50/-25 percent, as discussed in more detail in Section III.C. Id. at 6, 24. Exh. RR-EFSB-1.

3. Replacement of Existing Transformers and Addition of a New Transformer Alternative

This alternative would involve replacement of the two existing 25 MVA and 30 MVA transformers with two new 62.5 MVA transformers, as well as installation of a third new 62.5 MVA transformer, construction of a six-breaker ring bus and metal-clad switchgear and realignment of existing distribution feeders. Exh. EV-1, at 24. The addition of a third 62.5 MVA transformer would require that the existing transformer banks be replaced because they are, or are

⁸ Due to the location of DER facilities seeking to interconnect in the Plainfield-Blandford area, well as the topology of the 23 kV distribution system, the Company determined that the EPS upgrade projects identified for Blandford Substation would be the most cost-effective combination of alternatives that would allow for the safe and reliable interconnection of the DER, which includes the Expansion of the Blandford Substation. Exhs. EFSB-N-2; RR-EFSB-2; Tr. 1, at 43-45. Blandford Substation is the only Eversource substation that is located proximate to the existing and planned Blandford area DER facilities. Exhs. EFSB-N-2; RR-EFSB-3. Connecting DER facilities to a substation located further away would result in longer distribution feeders, more substantial voltage drop, potential voltage violations, lower reliability for customers, and higher interconnection costs for both DER and native load customers. Id. Future DER and load electrification enablement would accordingly be lower due to capacity constraints arising from these factors. Exh. EFSB-N-2.

approaching, being overloaded under N-1 conditions with the existing DER, new Group Study DER and in queue DER. Id. This alternative is estimated to cost approximately \$99 to \$165 million, based on an anticipated level of accuracy of -50/+200 percent. Id. While this alternative would enable more DER compared to the Project, it was not pursued primarily due to its substantially higher cost, greater amount of construction, and supplemental generation that would be required to complete construction. Id. As previously mentioned, additional infrastructure, such as a third transformer, could be added at the Blandford Substation later if it is needed. Exh. EV-1, at 24.

4. Non-Wire Alternatives

Non-wire alternatives (“NWAs”) may use a combination of energy efficiency and demand response programs, new DG, and new energy storage facilities to defer or avoid the underlying need for a transmission or distribution project. Exh. EV-1, at 25. NWAs may be effective when the underlying need for a project is driven by increasing customer load levels, so that the load reductions provided by the NWA allow an increasing number of electric customers to be served with the existing transmission and distribution infrastructure. Id.

Here, however, the Project need is to reliably serve the proliferation of existing and proposed solar and battery energy storage system projects. Exh. EV-1, at 25. Due to the sheer number and size of the interconnecting facilities, implementation of an NWA would not address the thermal overloads and other violations that would occur if these DG projects were connected to the existing system. Id. To accommodate the Group Study DG projects seeking interconnection, the additional hosting capacity afforded by transmission and distribution upgrades is critically needed. Id. Accordingly, NWAs do not solve the identified need and are not viable alternatives to the proposed Project. Id. For these reasons, the Company eliminated NWAs from further

consideration.⁹ Id.

5. Conclusion on Alternatives

Eversource analyzed alternatives and identified a technically optimal and viable solution that, given the applicable standards and criteria, would cost-effectively enable the safe, reliable interconnection of the Group Study DG and maintain quality of service for all customers, native load and DG alike. Exh. EV-1, at 23-26. The Project is the most cost-effective alternative that will effectuate the Substation and distribution capacity increases that are necessary to support safe and reliable DG interconnections in the Plainfield-Blandford Study area within the four-year implementation timeline. Id.

D. The Company Has Appropriately Avoided or Minimized Environmental Impacts and Proposed Appropriate Measures to Mitigate Unavoidable Environmental Impacts.

Eversource conducted a detailed analysis of the environmental resources in the vicinity of the Blandford Substation Expansion and has proposed measures to minimize unavoidable impacts to these resources from the construction and operation of the Substation Expansion. Exh. EV-1, at 26. Eversource's analysis demonstrates that the Substation Expansion will achieve an appropriate balance among environmental impacts, reliability, and cost. Id.

1. Construction Activities and Methods

The Substation Expansion will be constructed in full compliance with the National Electrical Safety Code ("NESC"), standards of the Institute of Electrical and Electronic Engineers and the American Standards Institute, good utility practice, and in accordance with the Company's specifications, best management practices ("BMPs"), final engineering plans, and the conditions

⁹ The Company also gave due consideration to advanced conductors, advanced transmission technologies, grid enhancement technologies, non-wires or non-pipeline alternatives and other alternatives to avoid or minimize expenditures and concluded that they were likewise inferior. Exhs. EFSB-PA-2; EFSB-G-5.

specified in permits and approvals obtained for the Project. Exh. EV-1, at 26. As demonstrated below, all impacts from construction will be temporary and minimized to the extent practicable.

Construction Schedule and Hours - The Company anticipates it will require approximately 18 months to complete construction of the Substation Expansion. Exh. EV-1, at 26. The Company initially proposed its typical construction hours between 7:00 a.m. to 8:00 p.m., Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturdays when daylight and weather conditions allow. Id., at 27. However, at the Town's request, the Company agreed to reduce its construction work hours and proposes to work from 7:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays. Exh. TOB-45. This schedule, while condensed, should allow the Company to meet its goals for the Project. Id.; Tr. 1, at 86. However, any further reduction could jeopardize the completion of the Project within the four-year window established in the Blandford Order. Tr. 1, at 86-87. The Company notes that heavy construction will not occur continuously for the duration of construction. Tr. 1, at 87-88. The majority of heavy construction will occur during the initial stages of construction and most of the work thereafter will be quieter (i.e., working on switchgear and transformers, testing continuity, relay settings, etc.). Id.

The Company will provide written requests for Sunday work or extended hours in advance to the Town for approval. Exh. EV-1, at 27; Exh. TOB-45. In limited circumstances, work tasks such as cable splicing, concrete pouring, and transformer filling, once started, will require continuous operation until completion. Exh. EV-1, at 27. Such work, and work requiring scheduled outages, may need to be performed on a limited basis outside of normal working hours (including evenings, weekends, and holidays). Id.; Tr. 1, at 86-87. The Company will provide notification to the Town should the need for continuous operation and extended work hours arise. Exh. EV-1, at 27.

Construction Sequencing - The fenced area of the existing Blandford Substation is approximately 0.65 acres. Exh. EV-1, at 27. As part of the Substation Expansion, the station yard will be expanded to the north, towards North Blandford Road, resulting in a new substation footprint of approximately 1.13 acres. Id. Construction will be conducted as follows so as not to disrupt substation operation: (1) site clearing and preparation including tree removal, grubbing, grading, slope stabilization measures, construction of staging and laydown areas and gravel access road construction or improvements; (2) installation of substation fence around expansion area; (3) replacement of the existing 19J-1X and 19J-2X transformers with two new 115/23 kV 62.5 MVA transformers, installation of two new circuit switchers, two new circuit breakers with associated disconnect switches, and switchgear; (4) cutover of existing distribution circuits to new switchgear; (5) demolition of existing substation equipment; and (6) site stabilization and site restoration work. Some of these activities will overlap to the extent that the site conditions allow. Id.; Exh. EFSB-N-5.

Mobilization and Laydown - Prior to the start of construction, Eversource's contractor will identify a marshaling/storage yard near each Substation, which is typically an existing contractor's yard or unused space at a commercial or industrial facility, for temporary offices, sanitation facilities, dumpsters, and containers specifically for collection and recycling shipping material and scrap metals. Exh. EV-1, at 28.

Erosion and Sediment Controls - Following mobilization, erosion and sediment ("E&S") controls will be installed in accordance with Eversource's BMP Manual. Exh. EV-1, at 28. Based on site-specific factors, the Company has determined that biodegradable wattle type E&S controls will be used. Id.; Exh. EFSB-CM-1. However, the type and location of erosion controls may change during construction based on specific Project needs or weather conditions, as allowed by

applicable permits and approvals. Id. In accordance with Eversource's BMP Manual, to protect wildlife, no welded plastic or mesh E&S controls will be used; rather, all wattles and blankets shall be constructed of biodegradable (coir or cotton) materials. Id.

Compliance Monitoring - During and following Project construction, environmental compliance monitoring will be conducted by qualified individuals to ensure that appropriate construction methods are employed to reduce environmental impacts and comply with applicable regulatory requirements. Exh. EV-1, at 28. Monitoring will be provided in accordance with the requirements of regulatory approvals issued for the Project. Id.

2. Evaluation of Environmental Impacts

Land Use – There are no anticipated permanent changes to abutting land uses associated with construction of the Substation Expansion, which will be consistent with the existing and surrounding utility infrastructure and current land uses. Exh. EV-1, at 29.

The overall land use in the vicinity of the Blandford Substation is rural. Exh. EV-1, at 29; Exh. EV-10. Vacant land surrounds the Substation Site on three sides. Exh. EV-1, at 29; Exh. EV-10. West of the Substation Site is a privately-owned wooded lot and the transmission right of way ("ROW") for Line 1421, a 115 kV overhead transmission line that interconnects with the Substation. Exh. EV-1, at 29. The ROW for Line 1853, a second 115-kV overhead transmission line that interconnects with the Substation, is located southeast of the Substation. Id. Directly east of the Substation Site, there is a cell tower and wooded lot. Id. Further eastward by approximately 350 feet (from fence line to fence line) is a solar array owned by Housatonic Solar LLC. Id. There is only one residence in the vicinity, located to the east of the Substation Site, with access on George Millard Road. Id. There is a large, wooded buffer and solar array between the Substation and the residence, which will not be disturbed by the Project. Id.

As noted above, the Substation Site is approximately 2.8-acres. Exh. EV-1, at 4. Access to the Substation Site is from an approximately 20-foot-wide by 150-foot-long driveway with frontage on North Blandford Road. Exh. EV-1, at 29. Most of the area between the existing Substation fence and North Blandford Road is maintained as ROW and supports several distribution feeders. Id. There are two small, wooded areas on the Substation Site: (1) one area is located east of the driveway, between the driveway and overhead distribution feeders; and (2) the other is located between the center distribution feeders and another feeder line to the east. Id. The Substation Site outside of the station fence is mostly previously disturbed, maintained ROW. Id. The Project will expand the fenced yard from approximately 0.65 acres to approximately 1.13 acres to accommodate new and upgraded equipment. Id. Approximately 0.50 acres of land will be disturbed during construction, including approximately 4,000 square feet of tree removal. Id.; see also Tr. 1, at 81. Most of this area has been previously disturbed and supports two overhead distribution feeder lines. Id.

Wetland and Water Resources – The Project was designed to avoid impacts to all regulated wetland resource areas and all Outstanding Resource Waters that are located east, south, and west of the Substation. Exh. EV-1, at 29-31; Exh. TOB-18; Tr. 1, at 107. To avoid these resource areas, the Substation Expansion is to the north side of the existing station and will be expanded within a previously disturbed area between the existing station and North Blandford Road. Exh. EV-1, at 29. Approximately 650 square feet of an isolated, non-jurisdictional wetland located along North Blandford Road on the east side of the expansion area will be filled. Exh. TOB-18. In addition, approximately 760 square feet of isolated wetland that is an excavated roadside ditch will be filled for the new access driveway, bringing the total fill within the non-jurisdictional wetland to 1,410 square feet. Id.; Tr. 1, at 110. The isolated wetlands are non-jurisdictional under both the

Massachusetts Wetland Protection Act (“WPA”) and Section 404 of the U.S. Clean Water Act.¹⁰ Exh. TOB-18. Construction matting will be used to protect the isolated wetlands for temporary access to the Substation Expansion area and for anchors for new feeder poles, which will be located outside the wetland. The wetland to the east of the existing driveway and the Substation is regulated as Bordering Vegetated Wetlands (“BVW”) under the WPA. Id. The Substation Expansion was designed to avoid direct impacts to BVW. Portions of the expansion are within the 100-foot buffer of the BVW. Id. The Company will submit a Notice of Intent (“NOI”) to the Blandford Conservation Commission once final engineering is completed for the Substation expansion. Id. A stormwater basin will be constructed adjacent to the expanded Substation on the west side of the station fence, which is located within the 100-foot buffer of a jurisdictional wetland and will be included in the NOI. Id.; see also Exh. TOB-19.

To avoid potential impacts to groundwater from spills of fuel or hydraulic oil related to the construction equipment, Eversource will require its contractors to adhere to the BMPs regarding storage and handling of oil and potentially hazardous materials during construction of the Substation expansion. Exh. EV-1, at 30-31. Construction equipment will be properly inspected, maintained, and operated to reduce the chances of spill occurrences of petroleum products. Temporary construction matting and other BMPs will be implemented, as appropriate, to avoid and minimize impacts during construction. Id. at 31. The Company and its contractors will have spill kits available at all times in the event of an inadvertent release of these substances. Id. To minimize the risk of environmental impacts associated with potential spills, contractors are required to inspect vehicles and equipment daily. Id. Eversource maintains a 24-hour-per-day/7-day-a-week spill response program in the event of an inadvertent release. Id.

¹⁰ Blandford has not adopted a local wetlands bylaw. Exh. EV-1, at 30.

Mineral oil will be used for electrical insulation and cooling in the transformers. Exh. EFSB-W-2. The volume of oil in each of the two new transformers will be approximately 9,720 gallons. Id. The new transformers will include 110 percent secondary containment, which is consistent with industry standards and guidelines for secondary containment, namely the National Electric Safety Code (ANSI C2) and the Guide for Containment of Oil Spills in Substations (IEEE 980). Exh. EV-1, at 31; Exh. EFSB-W-4. The planned secondary containment will be able to accommodate a 24-hour, 25-year storm event, which is defined as seven inches of rainfall over a 24-hour period. Exh. EV-1, at 31.

The Company contracts with licensed companies to chemically treat and control vegetation within and outside of the substation fences, including the Blandford Substation, and all herbicides used by the vendors are approved by the Massachusetts Department of Agriculture for use near water sources. Exh. EFSB-W-1. These procedures help ensure consistent vegetation management practices and environmental safeguards at all its substations, including at the Blandford Substation. Id.

After snow removal on Substation access drives and walking paths within the station fence, the Company uses only commercially available pellet ice melt for safe passage. Exh. EFSB-W-1. No special de-icing products are used. Id. The Company does not use any chemical deicers on its equipment. In the case of a catastrophic ice storm, the Company would use heat, where necessary, to remove ice from substation equipment. Id.

Flood Zone – The Blandford Substation and proposed expansion are not located within any mapped Flood Zone. Exh. EV-1, at 32.

Visual – The Substation Site is in a rural area with predominantly forested land cover and very low population density. Exh. EV-1, at 32-33; Exh. EV-10; Exh. TOB-20. The area

immediately surrounding the Site is mixed deciduous and evergreen forest with 80 percent canopy coverage greater than 30 feet in height and a well-vegetated understory. Exh. EV-1, at 32. The existing Substation is largely surrounded by forested areas and transmission line ROWs to the south, east and west. Id., at 33. The modest amount of vegetation removal needed for the expansion will not alter this natural buffer, as the expansion area is between the existing Substation yard and North Blandford Road. Id.; Exh. EV-10.

Public visibility of the Site is limited to vantage points on the Site's 400 feet of frontage along North Blandford Road where the Substation Expansion would be a continuation and expansion of the existing Substation facilities. Exh. EV-1, at 32-33; Exh. EV-10; Exh. TOB-20. From these vantage points, the viewshed consists primarily of the existing fenced Substation yard and the overhead distribution lines leaving the station (approximately 50 feet in height). Exh. EV-1, at 32.

To accommodate the Substation Expansion, the Company will remove the overhead distribution lines leaving the existing Substation and place them underground in duct banks prior to the Substation Expansion construction. Exh. EV-1, 32. The existing driveway will not be substantially altered during construction and, to facilitate safer entry and exit at the expanded Substation, an entrance to the Substation Site will be added from North Blandford Road into the northwest corner of the Substation. Id. Thus, once the Substation expansion and the distribution system upgrades are complete, there will be less congestion from the overhead lines leaving the Substation and there will be a new uniform fence in front of the newly expanded Substation. Id., at 32-33.

Although the Company considered planting on-site vegetation between the station fence and North Blandford Road to screen the infrastructure (see, e.g., Exh. EFSB-V-3), the Company

determined that required vertical and horizontal setbacks from the infrastructure would defeat the goal of providing a visual screen. Tr. 1, at 123-126. In particular, any vegetation planted between the station and North Blandford Road would need to be set back 10 feet from the station fence. Id. In addition, any vegetation planted in this area must not exceed 15 feet at mature height. Id. These standards reduce the risk of vegetation fall-ins with station infrastructure or the one distribution line that will remain in an overhead configuration once the Project is complete, which can cause interruption of service. Tr. 1, at 127. As already noted, all but one of the existing overhead distribution feeders into the station will be relocated underground in the area between the station and the road, resulting in less visual congestion. Exh. EV-1, at 32-33; Exh. TOB-20. At the end of construction, rather than the existing open-air bus, there will be a metal-clad switchgear building where the underground feeders will exit the switchgear, which will result in a more uniform viewshed from North Blandford Road. Exh. EV-1, at 32-33; Exh. TOB-20.

There are no sensitive receptors (e.g., residences, public buildings, places of worship) along North Blandford Road in the vicinity of the Site. Exhs. EV-1, at 32; EV-10; TOB-20. An approximately five-acre photovoltaic solar generation facility is located immediately east of the Site, and the three most proximate residential properties are located more than 1,500 feet away from the Site. Exh. EV-1, at 32; Exh. EV-10. Land cover between the Site and the residential properties includes agricultural fields, dense mixed deciduous and evergreen forest. Exh. EV-1, at 32; Exh. EV-10. Due to topography and existing dense vegetation, the Substation Expansion is not likely to be visible from the nearest residences. Exh. TOB-20. Nevertheless, the Company will consider the potential visual impact on area stakeholders and will work to address concerns and offer reasonable mitigation, if and where necessary. Id.; Exh. EFSB-V-2.

Noise – The Company will use construction methods and equipment, where appropriate, to reduce construction noise. Exh. EV-1, at 33. These will include use of the quietest equipment practicable to perform the work, foundation designs that minimize the amount of excavation required and maximize preassembly of components off site. Id., at 33-34. Estimated maximum sound levels for each equipment type expected to be used during construction are between 65 and 73 dBA approximately 200 linear feet from the Substation fence. Exh. EFSB-NO-9. The nearest residential abutter is more than 1500 feet from the Substation. Id. Sound from outdoor construction activity, with no physical obstruction, dissipates by approximately 6 dBA for every doubling of linear distance. Id. The dissipation of overall construction sound will likely be further aided by the irregular topography on site and the vegetative buffer between the site and abutters. Id. The Company expects that construction will be conducted using a six-day per week work schedule to minimize the duration of the Project and associated construction impacts. Exh. EFSB-NO-10; Exh. TOB-45. Because the Project involves work on an existing power system that serves customers, there may be times that work will need to occur outside of proposed work hours. Exh. EFSB-NO-10; Exh. TOB-45. In addition, there are certain operations that, due to their nature or scope, must be accomplished in part outside the specified working hours (i.e., activities that must occur continuously, such as cable splicing, once begun). Exh. EFSB-NO-10; Exh. TOB-45. To the extent such expanded hours are necessary, the Company will notify the Town and work with affected stakeholders to minimize impacts. Exh. EFSB-NO-10; Exh. TOB-45.

Regarding operational noise, the existing Blandford Substation normally operates with two transformers, one 115/23 kV 30 MVA and one 115/23 kV 25 MVA. Exh. EV-1, at 34. The Substation Expansion will replace both existing transformers with two new, state-of-the-art 115/23 kV 62.5 MVA transformers, each with a maximum design sound output of 62 dBA. Id. The

Company conducted a sound level assessment (“Sound Study”) to determine potential sound level impacts associated with the operation of the expanded Substation with the new transformers in operation, which included measurement of pre-existing ambient sound levels in the vicinity of the Substation, sound level modeling to predict impacts from the Substation Expansion, and a comparison of modeled sound levels with the applicable regulations and noise policy of Massachusetts Department of Environmental Protection (“MassDEP”).¹¹ Exh. EFSB-NO-1(S); Exh. EFSB-NO-1(S)(1). The monitoring duration, methodology, statistical analysis, and quality control measures of the Sound Study provide a thorough and defensible representation of long-term ambient noise conditions at the Project Site and nearby receptors.¹² Exh. EFSB-NO-1(S).

The new transformers will be the dominant noise sources for the expanded Substation. Exh. EFSB-NO-4. The noise will be continuous as a steady, broadband sound with identifiable low-frequency components that will vary depending on the load. Id. As the load increases, the temperature of the insulating oil in the transformers increases and at certain preset temperatures, specific transformer cooling fans will turn on. Id. There will be no vibration issues to any adjacent structures. Id. The Sound Study demonstrated that, under the current design, operation of the Substation Expansion will not result in sound level increases greater than 10 dBA above ambient

¹¹ The sound studies did not consider the scenario where both transformers would operate at 75 MVA at the same time because that is not a potential operating condition. Exh. EFSB-NO-1(S). The firm capacity of the Substation (the capacity with one transformer unavailable) is 62.5 MVA with 75 MVA being its long-term emergency rating. Id. If both transformers were operating at the same time, it would exceed the firm capacity of the station. Id.

¹² The sound monitoring provides an accurate representation of long-term conditions because the measurements were performed continuously over a seven-day period (April 22-29, 2026), capturing a full range of daily and weekly operational conditions, including daytime and nighttime periods, weekday and weekend activity, and variations in traffic and community noise sources. Exh. EFSB-NO-1(S). This duration is consistent with standard acoustic practice for establishing baseline ambient sound conditions and is sufficient to account for typical temporal variability in environmental noise. Id. The atmospheric conditions during the measurements did not include hourly average wind speeds greater than 11 mph and, while precipitation occurred from 9:00 PM on April 25 through 3:00 AM on April 26, these hours were excluded from the analysis of measured existing noise levels to establish ambient conditions. Id. The use of ANSI (American National Standards Institute) Type I sound level meters, along with field and laboratory calibration traceable to NIST (National Institute of Standards and Technology) standards, further ensures the accuracy and reliability of the data. Id.

conditions as measured at the Substation property boundary nearest the closest residential abutter. Exh. EFSB-NO-1(S)(1). The maximum predicted sound level at that location is an increase over ambient sound level of 7.1 dBA during the nighttime. Id., at 10. This complies with the MassDEP noise policy, which limits source levels to a sound level increase of no more than 10 dBA over background at the property line of residences and other noise-sensitive receptors. Exh. EV-1, at 34; Exh. EFSB-NO-1(S).

The modeling predicted a potential pure tone condition as defined by MassDEP at three receptor locations (RO1, RO2 and RO6). Exh. EFSB-NO-1(S); Exh. EFSB-NO-1(S)(1). As discussed above, the transformer input data for the Sound Study conservatively used an operating condition (one transformer at full load) that has an extremely low probability of occurring. Exh. EFSB-NO-1(S). Thus, the input data for the transformer is a prediction based on one discrete operating point that may never occur. Id.; Tr. 1, at 102. Moreover, the transformer manufacturer cannot guarantee the sound level spectrum of the transformers to be installed as part of the Substation Expansion and, accordingly, there is the potential for the installed condition to vary from the prediction modeling. Exh. EFSB-NO-1(S)(1), at 10. Finally, the houses on these three residential lots are located quite a distance from the three receptor locations used for the modeling. Exh. EFSB-NO-1(S). The Company notes that pure tones diminish in volume and intensity as the distance to the source increases. Id. Therefore, the pure tone will likely be weaker at the residences, if detected at all, than as modeled at the receptor locations used in the Sound Study. Id.

Given the potential for pure tone conditions, the Company notes the following. First, the Company proactively specifies transformers with the lowest commercially achievable sound output, which is achieved by using laser etched steel to reduce core sound and bracing the windings to reduce winding sound. Exh. EFSB-NO-3; Exh. EFSB-NO-1(S). The transformer tank is

constructed with integral sound attenuating walls to reduce both core and coil sound and multiple low speed fans are employed to reduce fan sound. Exh. EFSB-NO-1(S). This important first line mitigation is incorporated into every transformer of the size used on the Project and will be incorporated on the new transformers for the Substation Expansion. Id.

Second, the Company will place vibration isolators under both transformers during their installation, which will dampen mechanical vibrations and reduce noise. Exh. EFSB-NO-3; Exh. EFSB-NO-1(S); Tr. 1, at 105. The Company has had considerable success with this mitigation option in reducing or eliminating the risk of pure tone conditions on similar transformers and shunt reactors. Id.; Tr. 1, at 104.

Third, given that the prediction of pure tone conditions in the Sound Study was based on a single, worst case operating point that has an extremely low probability of occurring, and because the Company will specify transformers with the lowest commercially achievable sound output and install vibration isolators between the transformer bases and the foundations, the Company does not propose to implement any other mitigation before the Substation Expansion is in operation. Exh. EFSB-NO-1(S). Unless it is established that there are actual pure tone conditions during operation of the expanded Substation, there is no justification for installing costly sound walls or a total enclosure. Id.; EFSB-NO-13. Sound walls would increase Project costs from \$500,000 to \$1,500,000 (inclusive of estimated costs for engineering, materials, installation, and maintenance) depending on the number of sides to be shielded, the height of the enclosures, and whether the sound walls are added during construction or after the Substation Expansion is completed. Exh. EFSB-NO-13; Exh. RR-EFSB-5. This type of mitigation should be implemented only if noise complaints are received after the Substation Expansion is in operation and all other mitigation options have been exhausted. Exh. EFSB-NO-1(S).

Finally, the Company has well-established procedures for addressing noise complaints during construction and operation. Exh. EFSB-NO-1(S); Exh. EFSB-NO-7; Exh. EFSB-NO-14. Eversource has established email and phone communication channels by which stakeholders can reach out to the Company with questions and concerns before and during Project construction. Exh. EFSB-NO-1(S). If a stakeholder calls with a complaint about sound, the Company will gather details about the nature of the sound from the resident, investigate the complaint and offer to meet with the resident on site to better understand the nature of the sound. Exh. EFSB-NO-7. The Company will then investigate the potential actions that could be taken to mitigate any abnormal or excessive sound. Id.

Air Quality – Air quality impacts will be temporary and limited to the fugitive dust from disturbed soil surface areas and emissions from construction equipment and vehicles. Exh. EV-1, at 35; Exh. EFSB-A-1; Exh. EFSB-L-1. Dust generated from earthwork and other construction activities will be controlled by spraying with water and anti-tracking pads and regular sweeping of the pavement of adjacent roadway surfaces during the construction period will minimize the potential for construction traffic to kick up dust and particulate matter. Exh. EV-1, at 35.

Eversource will direct its contractors to retrofit any diesel-powered non-road construction equipment rated 50 horsepower or above to be used for 30 or more days over the course of the Project with U.S. Environmental Protection Agency-verified (or equivalent) emission control devices (e.g., oxidation catalysts or other comparable technologies). Exh. EV-1, at 35. Eversource uses ultra-low sulfur diesel fuel in its own diesel-powered construction equipment, which will reduce sulfur content by approximately 97 percent. Id., at 35-36.

Eversource and its contractors will also comply with state law (G.L. c. 90, § 16A) and MassDEP regulations (310 C.M.R. 7.11(1)(b)), which limit vehicle idling to no more than five minutes, with limited exceptions allowed by the regulations. Exh. EV-1, at 36.

Construction Traffic – The Company will coordinate with the Town to ensure that construction traffic impacts are minimized. Exh. EV-1, at 36. Ordinarily, construction vehicles will be working within the Substation Site and only limited entry and exiting of these vehicles will occur onto North Blandford Road. Id. To the extent practicable, delivery of materials or equipment will be planned during off-peak traffic hours; however, there may be situations when North Blandford Road must be temporarily blocked for a short time to accept supplies, move larger pieces of equipment onto the Substation Site, or to facilitate overhead distribution line upgrades across the road. Id. These situations will be infrequent and for a short duration. Id. In cases where traffic must be temporarily delayed, a police detail will be used to control traffic. Id. The Company will bear the costs of all required police traffic control services and will provide notice of a need for police traffic control at least 24 hours in advance of the anticipated need for all planned activities. Exh. TOB-47.

Waste, Debris, and Contaminated Soil – There are no mapped MassDEP Tier Classified 21E sites or Activity and Use Limitations (“AUL”) deed restrictions on the Substation Site. Exh. EV-1, at 36. If contaminated soil, groundwater or other regulated materials are encountered during construction, they will be managed pursuant to the Utility Related Abatement Measure provisions of 310 C.M.R. § 40.00 (the Massachusetts Contingency Plan, “MCP”). Id. at 36-37. Eversource will contract with a Licensed Site Professional as necessitated by conditions encountered along the Project alignment, consistent with the requirements of the MCP. Id. at 37.

Any materials to be removed from the Substation during construction that are characterized by MassDEP as waste ban materials, in accordance with 310 C.M.R. § 19.017(3), will not be disposed in landfills, and will be recycled to the extent practicable. Exh. EV-1, at 37.

Electric and Magnetic Fields (“EMF”) – The Company does not anticipate any appreciable increase in magnetic field levels at the expanded Substation fence line over what the existing Substation contributes because the dominant source of magnetic fields in the vicinity of substations is typically the transmission lines entering the substation and there will be no change to the transmission lines entering the Blandford Substation resulting from the Project. Exh. EV-1, at 37. In any event, magnetic fields from substation sources undergo significant attenuation at the distance between the source equipment and the fence line. Thus, there are presently negligible contributions to the magnetic fields at the station fence line and there is no expected increase of magnetic fields at the fence line resulting from the Substation Expansion. Id.

The Company’s internal analysis supports these conclusions. The Company took measurements at 35 locations within three feet of the existing Substation fence. Exh. EFSB-EMF-1. All measured magnetic fields taken at these locations (ranging from 2.7 milligauss “mG” to 27.8 mG) are well below the reference levels for whole body exposure by the public to 60-Hz magnetic fields, which are: (1) 2,000 mG, the reference level established by the International Commission on Non-Ionizing Radiation Protection; and (2) 9,040 mG, the maximum permissible exposure level established by the International Committee on Electromagnetic Safety. Id. Both organizations have concluded that evidence for adverse effects from long-term exposure to EMF is insufficient for setting exposure standards. Id.; Exh. EFSB-EMF-1(1).

The existing fields are typical of those measured at other Eversource substations. Exh. EFSB-EMF-1. Station fields are greatly attenuated at the fence line, and the dominant fields are

related to the lines entering and exiting the substation. In the case of the existing Blanford Substation, higher fields are present along the northern fence line where the distribution lines primarily enter the station, and along the eastern and western fence lines where the 115-kV transmission lines enter. Id. The Substation Expansion is expected to have similar magnetic field levels around the perimeter of the fence. Id. While the proposed fence line is expanded, primarily to the north, the equipment within the station will be a similar distance to the fence and the same number of transmission and distribution lines will enter the station. Id. Based on these factors, it is anticipated that magnetic field levels at the station fence will be similar to existing conditions. Id. Additionally, the station is such a distance away from the nearest abutter that neither an increase nor decrease in magnetic fields would be measurable. Id. For a typical 115-kV transmission line, at a distance of approximately 300 feet, magnetic fields from the line are indistinguishable from background levels. Id. The nearest abutter to the station is over 1,500 feet away. Id.

There will be no change in electric fields after the Substation Expansion because electric fields are a function of voltage and the Substation Expansion will not change the voltage nor the configuration of transmission lines entering the Substation. Exh. EV-1, at 37.

Archaeological and Historical Resources – The Substation Site has low archeological sensitivity due to previous site development from grading and filling. Exh. EV-1, at 37. The Company will file a Project Notification Form with the Massachusetts Historical Commission (“MHC”) and will continue to consult with the MHC and other stakeholders to identify potential significant cultural resources and to avoid, minimize, or mitigate any effects the Project may have on historic properties. Exh. EV-1, at 38; Exh. EFSB-L-2.

Areas of Critical Environmental Concern – The Substation Site is not within or near any Area of Critical Environmental Concern Exh. EV-1, at 38.

Protected Open Space and Article 97 Lands – No portion of the Substation Expansion will be within Protected Open Space or on land subject to Amendment Article 97. Exh. EV-1, at 38.

State-Listed Species and Habitat – No areas of protected habitat for state-listed species on the Substation Site were identified. Exh. EV-1, at 38.

Safety - The Substation Expansion will be constructed in full compliance with the NESC, standards of the Institute of Electrical and Electronic Engineers and the American Standards Institute, good utility practice, and in accordance with the Company’s specifications, BMPs, final engineering plans, and the conditions specified in permits and approvals obtained for the Project. Exh. EV-1, at 26.

The Company maintains an Emergency Response Plan (“ERP”) that applies to all its substations and the Company’s response to emergency situations. The Blandford Substation Expansion will be covered by the ERP. Exh. TOB-33; Exh. TOB-33(1). In addition, Eversource offers Electric Hazard Awareness Training to local first responders, which includes topics related to substation specific planning and response guidelines. Exh. TOB-34. First responder safety information is also available on the Eversource website. Id.

Climate Considerations – To ensure that it safeguards its valuable assets, the Company seeks to address Project vulnerabilities to climate change through a comprehensive internal review using the best available data on related hazards, including sea level rise, extreme weather conditions, and flooding. Exh. EFSB-G-3. The Company uses this data to inform design decisions and mitigate potential vulnerabilities to climate-related hazards at specific project locations. Id. The Company also proactively engages with local government agencies to ensure that projects do not exacerbate any climate-related hazards in the community. Id.

The Company utilized the ResilientMass Action Team (“RMAT”) Climate Resilience Design Standard Tool for the Substation Expansion. Exh. EFSB-G-3. The results show that the Blandford Substation has (1) no exposure to either Sea Level Rise Storm Surge and Extreme Precipitation – Riverine Flooding; and (2) high exposure to both Extreme Precipitation – Storm Water Flooding and to Extreme Heat. Id.; Exh. EFSB-S-4.

To mitigate any high-water conditions from Extreme Precipitation – Storm Water Flooding, Eversource has designed a stormwater management system for the Substation in accordance with the MassDEP Stormwater Management Standards that will minimize the impacts of stormwater flooding. Exh. EFSB-G-3. The stormwater system is designed to the National Oceanic and Atmospheric Administration requirements for a 24-hour storm. Id. In addition, a future rainfall event that could result in flooding would likely be forecast well in advance of the event, which would allow the deployment of flood barriers and dewatering pumps. Exh. EFSB-S-4. Moreover, the Company would evaluate the available predictive models and could increase the height of the equipment as necessary at such time as the equipment would require replacement. Id.

To manage the impacts from Extreme Heat, Eversource has specified equipment that has maximum operation temperature +40°C (104°F) at full load. Exh. EFSB-G-3. Ambient temperatures above 40°C would require equipment to operate below its stated ratings, reducing its capacity to ensure safe operation. Exh. EFSB-G-7. However, the equipment capacity is based on the equipment rejecting heat to ambient air with a maximum temperature of 40° C (104° F). Exh. EFSB-S-4. This means the equipment can safely operate at full load capacity while the surrounding air reaches this temperature without overheating or suffering accelerated insulation failure. Id. In addition, there will be equipment redundancy in the expanded substation, with each of the two transformers at the Substation rated to carry up to the full load (75 MVA) at 40°C. Id. In order for

extreme heat to impact the performance of the expanded substation, one transformer would need to be unavailable for service, the ambient air temperature would need to be above 40° C, and a peak load of greater than 75 MVA would need to be present. Id.; Tr. 1, at 70-72. Furthermore, the RMAT projection was run to the year 2070 based on the best available information at this time. Exh. EFSB-S-4. The exact measures to be taken will be subject to the actual conditions that evolve with time and industry practices at the time. Id. To mitigate the impact of higher temperatures on transformers, 25-kV switchgear, breakers, switches, and conductors, the Company could increase the heat rejection area of the transformer by adding more radiators and fans, which would allow heat to be transferred out of the transformer. Exh. EFSB-G-7. The exact combination of mitigation measures that could be employed at the Blandford Substation would depend on the loading profile (amount of load and duration that the load and higher ambient temperature exists) of the Substation at the time the design ambient temperature is exceeded. Id.; Tr. 1, at 72-75.

Conclusion on Environmental Impacts - Based upon the above, the environmental impacts associated with the Project are *de minimis* and/or temporary in nature and will be minimized to the extent practical.

E. The Substation Expansion Requires Individual and Comprehensive Zoning Exemptions.

1. Standard of Review

In determining whether an exemption from a particular provision of a zoning bylaw is “required,” the Siting Board looks to whether the exemption is necessary for the construction or operation of the petitioner’s project as proposed. See Eversource Mid Cape at 102; Eversource Oak Bluffs at 14; Eversource Westfield at 6.

It is a petitioner’s burden to identify the individual zoning provisions applicable to the project and then to establish on the record that exemption from each of those provisions is required:

The Company is both in a better position to identify its needs, and has the responsibility to fully plead its own case . . . The Department fully expects that, henceforth, all public service corporations seeking exemptions under c. 40A, § 3 will identify fully and in a timely manner all exemptions that are necessary for the corporation to proceed with its proposed activities, so that the Department is provided ample opportunity to investigate the need for the requested exemptions.

New York Cellular Geographic Service Area, Inc., D.P.U. 94-44, at 18 (1995); Eversource Mid Cape at 102-03; Eversource Oak Bluffs at 14; Eversource Westfield at 6-7. The Siting Board encourages zoning exemption applicants to first consult with local officials prior to seeking zoning exemptions under G.L. c. 40A, § 3. Eversource Mid Cape at 98-99; NEP Beverly Salem at 117; Eversource Sudbury-Hudson at 193.

As described in more detail below, the construction and operation of the Substation Expansion is, or may be construed to be, inconsistent with certain provisions in the Blandford Zoning Bylaw, which would require local zoning relief.¹³ However, the Substation Expansion is needed in the immediate time frame to provide reliable transmission service and to increase capacity of the electric system in the area to facilitate the interconnection of DG projects. To allow for the timely and efficient construction of the expanded Substation, Eversource is seeking both individual and comprehensive zoning exemptions from the operation of the Zoning Bylaw because of the uncertainty in obtaining local zoning relief and the potential for adverse interpretations, delay, burden and undue expense associated with the local permitting process and appeals therefrom.

2. The Company's Outreach with Blandford Zoning Officials

As noted above, prior to seeking zoning exemptions under G.L. c. 40A, § 3, the Company met with the Town's Building Commissioner on March 21, 2025, to present an overview of the

¹³ There have been no amendments of the Zoning Bylaw nor any refinements of the Project design since the filing of the Petition that require updates to the individual zoning exemptions requested by the Company for the Substation Expansion. Exh. EFSB-Z-2.

work to be performed at the Substation and a preliminary list of zoning relief that would be required for the Substation Expansion. Exh. EV-1, at 6; Exh. EFSB-PA-3; Exh. EV-5. While the Company expressed a preference for seeking local zoning relief, the Company noted that seeking exemptions from the Siting Board was also an option; thus, the Company discussed with the Building Commissioner the process for seeking individual and comprehensive zoning exemptions pursuant to G.L. c. 40A, § 3, including notice, posting and publication of the public comment hearing and the opportunity for the Town and abutters to participate or intervene in the evidentiary proceeding. Exh. EV-1, at 6. The Building Inspector did not express any concern about the possibility that the Company could seek zoning exemptions rather than local zoning relief. Id. at 7.

3. Zoning Exemptions Are Needed from Specific Provisions of the Zoning Bylaw.

Exemptions are needed from the following provisions of the Zoning Bylaw to ensure the efficient and timely construction of the Blandford Substation Expansion.

Substation Use in Agricultural Zoning District. The Substation Site is in the Agricultural zoning district. Exh. EV-1, at 39-40. Section 4.3.1 provides the list of uses allowed as-of-right and by special permit in the Town's zoning districts. Substation use is not listed in Section 4.3.1 and, therefore, it is prohibited in the Agricultural zoning district. Id.; Tr. 1, at 30, 32. However, the Blandford Substation is grandfathered as a pre-existing nonconforming use because it appears that substation use was allowed as-of-right when the station was first constructed in 1968. Exh. EV-1, at 39. Per Section 2.2 of the Zoning Bylaw, the Blandford Board of Appeals may grant a special permit to change or substantially extend a nonconforming use, but only if it determines that such change or extension shall not be substantially more detrimental than the existing nonconforming

use to the neighborhood.¹⁴ Id.; Exh. EV-2; see also Tr. 1, at 30-33. This is a subjective standard, however. Should the Board of Appeals find that the Substation Expansion is substantially more detrimental than the existing Substation to the neighborhood, the Company would be required to appeal that decision pursuant to G.L. c. 40A, § 17, a process that is both lengthy and costly. Because the Substation must be constructed within the four-year window as set forth in the Provisional Program, to avoid the delay and cost of seeking local zoning relief and pursuing appeals from unfavorable decisions, the Company seeks an exemption from the prohibition of substation use in Section 4.3.1 and from the need to seek a special permit to extend or expand a pre-existing nonconforming use per Section 2.2 of the Zoning Bylaw.

Signs. The Company will construct an eight-foot fence around the perimeter of the expanded Blandford Substation. Signage will be required as follows:

- No Trespassing Signs (approximate size: 12” x 9”)
- Contact Information Signs (approximate size: 14” x 10”)
- Danger Signs (approximate size: 14” x 10”)

Exh. EV-1, at 40. The “No Trespassing” and “Danger” signs will be located along the perimeter fence and the “Contact Information” signs that identify the Company as the owner and provides

¹⁴ The burden to demonstrate that a use is a pre-existing nonconforming use (i.e., that the use was allowed at the time it was commenced) is on the applicant and the Board of Appeals may find that an applicant has not met this burden. Exh. EV-1, 39-40. The Company could not locate the Zoning Bylaw in effect in 1968, nor does it have any record of having obtained either local zoning relief or an exemption from the Department for the original Substation. Id. The absence of such zoning relief tends to demonstrate that the use was allowed at the time because the Company and its predecessors routinely sought exemptions from the Department if zoning relief was required for an infrastructure project. Id. If the Board of Appeals were to find that the Substation use is not pre-existing nonconforming, then a use variance would be needed for the Substation Expansion because it is not a permitted use in the zoning district. Id.; Tr. 1, at 30, 32. The Board of Appeals is explicitly prohibited from granting such relief per Section 7.2.2 of the Zoning Bylaw and, accordingly, an exemption would be *per se* required. Exh. EV-1, 39-40. The Company’s Petition requested an exemption from the need to obtain a use variance in this scenario described in this footnote. While the Company notes that the Building Commissioner opined that he considers the Substation a pre-existing nonconforming use (Tr. 1, at 32), the Board of Appeals is the ultimate factfinder. Accordingly, for the avoidance of doubt, the Company requests an exemption from the need to obtain a use variance as discussed herein.

emergency contact information will be placed at facility access points. Id. The signs are needed for public safety and to comply with industry standards. Id.

Section 5.2 of the Zoning Bylaw regulates signs. Exh. EV-1, at 40; Exh. EV-2. While Section 5.2.1.1 allows signs in all zoning districts up to a maximum size of six square feet, Section 5.2.1.2 allows only one sign per business. Exh. EV-1, at 40; Exh. EV-2. Thus, the Company's proposed signs are not explicitly permitted, and a variance would be needed to post the above discussed signs at intervals on the fence and at facility access points. Exh. EV-1, at 40-41.

To ensure compliance with the sign requirements, the Company would need to obtain variances. Exh. EV-1, at 40; Exh. EV-2. To grant a variance, the Blandford Board of Appeals would need to find all of the following in accordance with G.L. c. 40A, § 10 and Section 7.5.2 of the Zoning Bylaw: (a) circumstances exist relating to soil conditions, shape or topography of the particular parcel or structure that do not affect generally the zoning district in which the parcel or structure is located; (b) a literal enforcement of the provisions of the bylaw would involve substantial hardship to the applicant and there is a nexus between the special circumstance and the hardship; and (c) the relief requested may be granted without substantial detriment to the public good and without nullifying or substantially derogating from the intent or purpose of the bylaw. Id. It would be difficult, if not impossible, to demonstrate the existence of unique conditions relating to soil conditions, shape or topography of the Substation Site that generally do not affect the rest of the lots in the Agricultural zoning district and failure to meet even one of the criteria would doom the grant of a variance. See Kirkwood v Board of Appeals of Rockport, 17 Mass.App.Ct. 423, 428 (1984). Moreover, variances are a legally disfavored form of relief. See, e.g., Cornell v. Board of Appeals of Dracut, 453 Mass. 888, 895 (2009); Planning Board of Nantucket v. Board of Appeals of Nantucket, 15 Mass.App.Ct. 733, 738 (1983). The courts have

held that no one is entitled to a variance, and that they are to be granted sparingly. See Damaskos v. Board of Appeal of Boston, 359 Mass. 55, 61 (1971). As a result, variances can be notoriously difficult to obtain. Finally, even if granted, variances are susceptible to legal challenge, and the courts undertake review of variances on a *de novo* basis and would need to make independent findings of fact. See, e.g., Kirkwood, supra at 426-27. Because of the legal uncertainty in obtaining variances, and the potential for adverse interpretations, delay, burden, and undue expense associated with the permitting process and appeals therefrom, the Company seeks an exemption from any prohibitions in Section 5.2 of the Zoning Bylaw that would require variances for the proposed signs.

Construction Trailers: One or two construction trailers will be required on the Substation Site for the duration of the construction period. Exh. EV-1, at 41. Section 5.3 of the Zoning Bylaw regulates trailers but is silent on whether construction trailers are allowed. See Exh. EV-2. While the Board of Appeals may authorize the use of trailers as temporary residences, commercial trailer bodies (i.e., moving vans, auto carriers, commercial load bodies) are specifically prohibited. These provisions are ambiguous as to whether the construction trailers would be allowed. Tr. 1, at 144. To the extent that zoning relief in the form of a variance is required to authorize the placement of construction trailers on the Substation Site, the Company seeks an exemption from any such requirement in Section 5.3 of the Zoning Bylaw.

Site Plan Approval. Section IX of the Zoning Bylaw provides the requirements for site plan review. Per Sections 9.1.2 and 9.1.3, site plan review by the Blandford Planning Board is required for all construction, exterior alteration, relocation, or change in use, except in connection with the construction or enlargement of any single family or two-family dwelling or building accessory to such dwelling, or for any building used exclusively for agriculture, horticulture, or floriculture.

Exh. EV-2. As such, the Substation Expansion triggers the need for site plan review and approval. Exh. EV-1, at 41-42.

Sections 9.1.7 and 9.1.8 set forth the conditions for approval of a site plan, among which are that approval of the site plan is based on a determination that the proposed project will constitute a suitable development and complies with the standards set forth in the bylaw, and that approval of the project is subject to any conditions, modifications and restrictions imposed by the Planning Board. Such criteria involve subjective findings by the Planning Board. Exh. EV-2.

Notwithstanding the goals of site plan review to ensure the health, safety, and general welfare of the inhabitants of the Town of Blandford, the Company must have the discretion to design the Blandford Substation Expansion layout in a manner that is consistent with established utility standards to ensure its safe and reliable operation. Exh. EV-1, at 42. Such technical engineering and electrical issues are typically beyond the general scope of local site plan review. Id. The Project, however, has been designed in a manner that is consistent with established utility, state, and federal standards to ensure the safe and reliable operation of the infrastructure. Id. The Company has designed the Substation Expansion to meet as many of the requirements of the Zoning Bylaw as practical while ensuring that the Substation layout meets the applicable industry standards. Id. To the extent that the Substation Expansion will not meet the subjective criteria for site plan approval, and because the Substation layout and technical criteria are different from the typical development projects for which site plan review is typically required, the Company seeks exemption from the requirements of Section IX of the Zoning Bylaw that are or may be applicable to the Substation Expansion.¹⁵ Id.

¹⁵ The Company notes that Section 9.1.2 provides that, for projects that require site plan review, no building permit shall be issued until a site plan has been endorsed by the Planning Board. The Company has requested an exemption from the entirety of Section IX. So, if the exemption is granted, the issuance of the building

To avoid ambiguities in the interpretation of the Zoning Bylaw and the need to seek special permits, use and dimensional variances and site plan approval, the Company seeks the exemptions summarized below to construct, operate, and maintain the Substation Expansion in Blandford:

permit would no longer be conditioned on the endorsement of a site plan. The Company notes that it cannot seek an exemption from the requirement of obtaining a building permit because those are issued pursuant to the State Building Code, not pursuant to the Zoning Bylaw.

Bylaw Provision	Local Zoning Relief	Why Exemption is Needed
Substation Use Section 2.2 Pre-existing non-conforming use Section 4.3.1 Prohibition of public utility/substation	Special Permit for change or extension of a non-conforming use Use variances for prohibition of public utility/substation use in the Agricultural zoning district	Special permit is issued only upon subjective finding that the change or extension shall not be more detrimental to the neighborhood than the existing non-conforming use. The Board of Appeals is not authorized to grant use variances in the Town of Blandford; therefore, an exemption is per se required from the prohibition of substation use on the Substation Site in the event the Board of Appeals did not find that the Substation use was preexisting nonconforming.
Section 5.2 Signs	Variances	The danger, warning and identification signs that the Company affixes to the substation yard fence are not explicitly allowed. To ensure the Company's use of the signs, variances would be required and the criteria for variances are difficult to meet.
Construction Trailers Section 5.3	Variance	Section 5.3 of the Zoning Bylaw regulates trailers but is silent on whether construction trailers are allowed. To the extent that zoning relief is required to authorize the placement of construction trailers on the Substation Site (<u>i.e.</u> , a variance), the Company seeks an exemption from any such requirement.
Section IX Site plan review	Site plan approval	The goals of site plan review in Blandford are not entirely consistent with the need for the Company to design the Substation Expansion in conformance with established utility standards. Moreover, site plan approval may be conditioned in manner that would prohibit or restrict the construction and operation of the Substation Expansion. The Company must have the discretion to design the Substation Expansion consistent with utility standards and the technical and engineering issues involved are beyond the scope of typical site plan review. Accordingly, the Company seeks an exemption from any requirement to obtain site plan approval per Section IX.

4. The Substation Expansion Requires A Comprehensive Zoning Exemption to Avoid Substantial Public Harm.

The Company respectfully requests a comprehensive exemption from the operation of the Blandford Zoning Bylaw with respect to the Blandford Substation Expansion. The grant of a comprehensive zoning exemption is based on the specifics of each case. Petition of Park City Wind LLC, EFSB 20-01/D.P.U. 20-56/20-57, at 208 (2023) (“Park City Wind”); NEP Beverly Salem at 126; Petition of Vineyard Wind LLC, EFSB 17-05/D.P.U. 18-18/18-19, at 153 (2019) (“Vineyard Wind”). The Siting Board will consider a request for comprehensive zoning relief when issuance of a comprehensive exemption is imminently needed to avoid substantial public harm. Park City Wind at 208; NEP Beverly Salem at 126; Vineyard Wind at 153.

The Siting Board has cited factors as relevant in making a determination to grant a comprehensive exemption including, but not limited to, whether: (1) the project is needed for reliability purposes; (2) the project is time sensitive; (3) there are multiple municipalities involved that could have conflicting zoning provisions that might hinder the uniform development of a large project spanning these communities; (4) the project proponent has actively engaged the communities and responsible officials to discuss the applicability of local zoning provisions and address local concerns; and (5) the communities affected by the project do not oppose the issuance of a comprehensive zoning exemption. Park City Wind at 208; NEP Beverly Salem at 126-27; Vineyard Wind at 153.

Notably, the grant of a comprehensive zoning exemption is necessary even where individual zoning exemptions are granted, as the two types of zoning exemptions serve distinct needs. Exh. EV-1, at 44-47. First, because zoning bylaws and ordinances are rarely written with unique energy infrastructure facilities in mind, many zoning bylaws and ordinances lack clearly defined and specific regulation of electric infrastructure, and the sometimes vague and subjective

terms and provisions in zoning bylaws and ordinances result in an imprecise, at best, application of the zoning provisions to the electric infrastructure. Id. The Company interprets the provisions of zoning ordinances and bylaws conservatively, in the hope that it is requesting individual zoning exemptions for all the provisions that could conceivably be said to apply to a project; however, the grant of a comprehensive exemption removes any reasonable doubt as to the ability of a project to move forward without violating any current terms of the zoning bylaws and ordinances. Id. In addition, individual zoning exemptions relate to specific provisions in the zoning enactments *currently* in effect that have the potential to conflict or be inconsistent with, prevent, delay or obstruct the construction or operation of an infrastructure project. Id. Comprehensive zoning exemption goes beyond the provisions in the current zoning bylaws (from which an individual zoning exemption may be granted), to exempt the proposed project from any *future* zoning enactment that comes into effect that has the potential to jeopardize its construction. In this manner, the two types of zoning exemptions work in tandem to ensure that meritorious energy facilities like the Substation Expansion are constructed as approved by the Siting Board without undue delay. Id.

As described herein, the Substation Expansion satisfies the standards for the grant of comprehensive zoning exemptions. Exh. EV-1, at 44-47. First, as described in more detail herein, the Substation Expansion is needed to: (1) maintain a reliable electric system; (2) enable the Group Study DG facilities in the Plainfield-Blandford area to safely interconnect and operate; (3) allow future DG applicants in the area to interconnect; and (4) accommodate future load growth due to electrification. Id. The Substation Expansion is imminently needed because DER facilities in the interconnection queue cannot currently interconnect into the existing EPS, and to comply with D.P.U. 20-75-B and D.P.U. 22-54, which established a four-year construction window for the

Substation Expansion that began in June of 2024 and concludes in June of 2028. Id.; Exh. EFSB-Z-4; Tr. 1, at 145-46. The Company was required to demonstrate in its CIP Proposal for the Plainfield-Blandford area that the components of the construction timeline within the Company's control could be completed within this four-year window. Exh. EV-1, at 46. The Company has made all commercially reasonable efforts to avoid undue delays in designing the Substation Expansion, and preparing and filing this Petition, all of which have occurred within 12 months of the start of the construction window. Id. Finally, there is only one municipality involved with the Substation Expansion and the Town intervened in this proceeding in opposition to the Substation Expansion. However, the Company notes that not all factors must be met for the grant of a comprehensive exemption. See, e.g., NSTAR Electric Company d/b/a Eversource Energy, EFSB 14-04/D.P.U. 14-153/14-154, at 163 (2017), where a comprehensive exemption was granted when, as is the case here, only one municipality was involved. Moreover, the Company has considered the Town's concerns and requests made during this proceeding and, where feasible considering the Company's obligation to meet reliability standards and minimize cost and environmental impacts, the Company has committed to addressing those concerns and requests. See Section VI.E. below.

In sum, a comprehensive zoning exemption from the operation of the Blandford Zoning Bylaw would ensure the timely construction of the important Substation Expansion, which will provide benefits directly to customers and the DER developers in the Plainfield-Blandford area for whom these facilities are being constructed.

VI. THE PROJECT MEETS ALL STANDARDS IN G.L. c. 164, § 69H

Section 69H of G.L. c. 164 ("Section 69H") was amended in 2024 to require the Siting Board to make explicit findings that energy facilities avoid, minimize or mitigate environmental

and health impacts to ensure a “reliable, resilient and clean supply of energy” that directly aligns with the Commonwealth’s 2050 net-zero carbon emission goals. The following demonstrates the Project’s compliance with the standards in Section 69H. Exh. EFSB-G-5.

A. The Project Provides a Reliable, Resilient and Clean Supply of Energy Consistent with the Commonwealth's Climate Change and Greenhouse Gas Reduction Policies and Requirements.

The Project meets this standard. First, the very purpose of the Project is to ensure that the Company’s transmission system in the Plainfield-Blandford Area is robust enough to support the interconnection of DER. The Project is a component of the Company’s CIP for the Plainfield-Blandford Area that was submitted to the Department in compliance with the Provisional Program, the goal of which is to ensure the expeditious installation of electric power system upgrades to enable the construction of emissions-free solar and energy storage system projects currently in the interconnection queue that have not been able to move forward because of the high cost of interconnection. D.P.U. 20-75-B (2021); D.P.U. 22-52; Exh. EV-1, at 2-3.

The Plainfield-Blandford Group CIP identified the Substation Expansion as a necessary upgrade to safely interconnect DER (including both those currently in the interconnection queue and future DG projects) to the Company’s transmission system in the Plainfield-Blandford Area. The Department approved the Plainfield-Blandford CIP, subject to certain modifications. D.P.U. 22-52 (2024).

In addition, the Plainfield-Blandford CIP is included in the Eversource Electric Sector Modernization Plan (“ESMP”), docketed as DPU 24-10. The ESMP has overarching goals of a clean energy transition, promoting clean energy enablement, enabling future electrification, improving resiliency in the face of climate change, and energy decarbonization. D.P.U. 24-10, at 161, 297 (hosting capacity), 387-388, 395-396 (electrification).

Second, the Company has demonstrated that there will be minimal, if any, GHG or other

emissions resulting from the Project. Air quality impacts are modest and limited to construction activities. Exh. EV-1 at 35-36; Exh. EFSB-A-1. Fugitive dust will be controlled by water spraying, using anti-tracking pads, and regular sweeping. EV-1 at 35-36. Diesel-powered non-road construction equipment (rated 50 horsepower or above to be used for 30 or more days over the course of the Project) will be retrofitted with USEPA-verified emission control devices. Id. Ultra-low sulfur diesel fuel will be used in the Company's diesel-powered construction equipment, and the anti-idling statute and regulations will be followed. Exh. EV-1 at 35-36. The new gas circuit breakers will be designed to have a maximum SF₆ leak rate of 0.1% per year; moreover, they will be filled and sealed at the factory and any refilling will be performed by trained Eversource employees. Exh. EFSB-A-3.

Third, the Company has demonstrated that the Project is consistent with the Commonwealth's climate change policies. Notably, the very purpose of the Provisional Program and the Plainfield-Blandford CIP is to facilitate the interconnection of clean renewable energy facilities. At the same time, the Company ensures that it safeguards its valuable assets by addressing Project vulnerabilities to climate change through a comprehensive internal review using the best available data on related hazards, including sea level rise, extreme weather conditions, and flooding. Exh. EFSB-G-3. This was confirmed by the Company's use of the RMAT tool for the Substation Expansion. Id.; Exh. EFSB-G-3(1).

B. The Project Has Been Designed to Avoid, Minimize or Mitigate Environmental Impacts and Negative Health Impacts to the Extent Practicable.

The record demonstrates that the Company has taken the appropriate measures to avoid, minimize or mitigate environmental impacts. Exh. EV-1 at 26-38. In short, the Project will not impact air quality. Id. There are no Areas of Critical Environmental Concern or archeological resources within the vicinity of the Substation Site, and the Substation Site is not in the floodplain.

Id. Operation of the expanded Substation will meet all state and local noise policies and guidelines, with the exception that the modeling predicted the potential for pure tones at three locations. Exh. EFSB-NO-1(S); Exh. EFSB-NO-1(S)(1). The Company will incorporate vibration isolators under both transformers during their installation, which the Company believes will reduce or eliminate the risk of pure tone conditions at the receptors. Id. While there are no residential abutters within 1500 feet of the Substation, the Company will offer off-site visual mitigation to nearby property owners whose view has materially changed because of the Project. EV-1, at 32-33; Exh. EV-10. While there will be minor impacts to non-regulated, isolated wetlands, the Company has designed the Project to avoid impacts to wetland resource areas on and adjacent to the Substation Site. Exh. EV-1, at 29-32. The Company will file a Notice of Intent with the Blandford Conservation Commission pursuant to the state Wetlands Protection Act, G.L. c. 131, § 40 for approval. Id. Construction impacts will be minimal and mitigated to the extent practicable. Exh. EV-1, at 26-28. The Project also will not result in any negative or adverse health impacts. Exh. EV-1, at 26-38. As the record demonstrates, the Substation Expansion will not result in increased exposure to EMF. Id.

C. The Project Complies with Energy, Environmental, Land Use, Labor, Economic Justice, Environmental Justice and Equity and Public Health and Safety Policies of the Commonwealth, Its Subdivisions and Its Municipalities.

Energy policies - The Project is consistent with the Department's approval of the Plainfield-Blandford CIP, and the Petition demonstrates the need for the Project to ensure interconnection of DER. Exh. EV-1, at 2-3, 11-22.

Environmental policies - The Petition demonstrates the Project's compliance with all applicable state and local environmental statutes, regulations, and policies. Exh. EV-1, at 26-38.

Land use policies - The Substation Expansion is consistent with the Company's current use of the Substation Site. The Project will not have an adverse effect on land use in the vicinity of the Substation. Exh. EV-1, at 28-29.

Labor policies - The Company will use in-house union labor to the extent practicable and will comply with all labor laws. Exh. EFSB-G-5. For activities that must be performed by outside labor, the Company's contracts will conform with all applicable labor laws. Id.

Economic justice - The Project is consistent with notions of economic justice because it ensures the provision of reliable electric service to all customers throughout the Company's electric system (including in Blandford), without regard to economic status and in a non-discriminatory manner. Exh. EFSB-G-5. The Company proposes new electric infrastructure where it is needed to reliably serve electric load on a non-discriminatory basis, thereby providing everyone with same opportunity to have electricity and participate in Commonwealth's clean energy goals. Id.

Environmental justice and equity - The Blandford Substation is not located in or within a one-mile radius of an Environmental Justice community. Exh. EV-1, at 7; Exh. EFSB-G-5. The purpose of the expansion project at the Blandford Substation is to interconnect new renewable energy resources, create future capacity to accommodate electrification, and improve reliability of the regional transmission grid. By completing this work, the Company is contributing to the provision of a clean and healthy environment for all people in the Commonwealth. Id.

Public safety – The Substation Expansion will be constructed in full compliance with the National Electric Safety Code, good utility practice, and in accordance with the Company's specifications, BMPs, final engineering plans, and the conditions specified in permits and approvals obtained for the Substation Expansion. Exh. EV-1, at 26; Exh. EFSB-G-5. During

construction, areas under construction that contain in-service equipment will be secured by the existing substation perimeter fence that meets or exceeds the requirements of the NESC and are accessible only with a qualified escort. Exh. EFSB-G-5. During operation, the first line of security will be the Substation perimeter fences, which will meet or exceed NESC requirements. Id. Cyber security measures will include card readers on doors and access points, and firewalls on communication links. Id. The Company's Emergency Response Plan will apply to the Substation Expansion. Id. The Company maintains a system control center that will dispatch personnel and equipment to the scene of any unplanned event to coordinate first response actions. Id. The Company makes first responder training available in all municipalities that host its substations. Id.

Public health - The Company operates transmission facilities in every municipality in its service territory, in proximity to residential and nonresidential uses, and there have not been demonstrated public health impacts from these facilities. Exh. EFSB-G-5. There will be no air emissions or water quality issues associated with the construction and operation of the Substation Expansion. Exh. EV-1, at 26-38. Finally, because of the nature of the equipment and the layout of the facility, the electric and magnetic fields at the Substation will be attenuated to background levels at the Substation fence lines and, accordingly, there will be no public health impacts from EMF exposure. Exh. EFSB-EMF-1. Therefore, the Project will not result in public health impacts.

D. The Project Will Be Constructed in a Manner that Avoids or Minimizes Costs.

The Company proactively designs its projects to achieve an appropriate balance of environmental impacts and cost. Exh. EV-1, at 2-3. All costs incurred in furtherance of the Project are subject to regulatory review to ensure that they are prudently incurred. Exh. EFSB-G-5.

E. The Company Duly Considered the Findings and Recommendations of Local Governments.

The Town raised several concerns during this proceeding and requested that the Siting Board incorporate several conditions into its Final Decision should it grant the Company's requested exemptions. See, e.g., Exh. TOB-55. The Company gave due consideration to those concerns and requests, as demonstrated in the following commitments to address the Town's concerns:

- The Company will meet with the Town Administrator monthly to provide a high-level update on the Substation Expansion, including (1) a status of Project construction; (2) the schedule of activities for the next month including potential traffic disruptions and potential impacts on the residents who live on North Blandford Road; (3) a report of any complaints received the previous month and the status regarding the Company's response and resolution of the issue; and (4) a monthly look-ahead for any anticipated deliveries. Exh. TOB-36; Exh. TOB-38; Exh. TOB-55; Tr. 1, at 82.
- The Company agrees to reduce its construction work hours to 7:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays, with the usual caveats regarding emergency work and work outside of normal work hours for activities that, once started, must be completed without interruption. Exh. TOB-45; Tr. 1, at 86-87.
- The Company will bear the costs of all required police traffic control services and will provide notice of a need for police traffic control at least 24 hours in advance of the anticipated need for all planned activities and will keep the Town Administrator informed via email or phone call. Exh. TOB-47.
- The Company agrees to periodically check with the Blandford Planning Board for updated information about proposed revisions to the Blandford Zoning Bylaw. Exh. TOB-49.
- To ensure ongoing communication with the Town and public visibility into community feedback, the Company will maintain a publicly accessible feedback summary on the Project website that documents the types of feedback received and any resulting actions. Exh. TOB-50.
- The Company will be financially responsible for any property damage that is caused by Project construction. Exh. TOB-52.
- Once the Company has executed a contract with the general contractor, and that contractor has executed contracts with its civil site subcontractors, the Company will provide the name of each contractor and subcontractor and a description of each entity's scope of work to the Town. Exh. TOB-55.

- When the Company receives shipping information from its vendors regarding permitted load deliveries, it will provide the Town with a description of transported equipment, including dimensions, weight and function. Exh. TOB-55.
- The Company will provide any designated travel routes for permitted load deliveries once it selects a general contractor. Exh. TOB-55.
- Once the schedule for permitted load deliveries is known, the Company will provide the Town with the gross vehicle weight and axle load configurations as provided to it by the vendor. Exh. TOB-55.
- The Company will provide the Town with a materials manifest for materials classified as hazardous under applicable state or federal law. Exh. TOB-55.
- The Company will endeavor to provide the Town with notice of a need for police details at least 24 hours in advance of the anticipated need for all planned activities, keeping in mind that deliveries are frequently delayed during interstate travel and the exact delivery date and time are difficult to predict even days in advance, and will keep the Town Administrator informed via email or phone call. Exh. TOB-55.
- Once the general contractor is selected and the construction schedule is developed, the Company will share with the Town its estimates of peak construction traffic per phase of construction. Exh. TOB-55.
- The Company will notify the Town Administrator by phone within 24 hours of the occurrence of an incident that required police, fire, or emergency medical services in connection with Project construction and operation and will follow up with an email correspondence. Exh. TOB-55.
- The Company will offer Electric Hazard Awareness Training to the Town's first responders. Exh. TOB-34; Exh. TOB-55.
- The Company will provide pre- and post- video and/or photographic documentation of the roadways that will be utilized for Project-related transport. The Company notes that such documentation alone will not prove that any damage to roadways was caused by Project-related transport and, notwithstanding the Company's agreement to provide it, documentation of damage shall not be construed as an admission of liability, fault, or wrongdoing by the Company. Exh. TOB-55.
- The Company will provide plans for the secondary containment system when they are available. Exh. TOB-55.

F. The Company Duly Considered Advanced Conductors, Advanced Transmission Technologies, Grid Enhancement Technologies, Non-Wire or Non-Pipeline Alternatives and Other Alternatives to Avoid or Minimize Expenditures

The Company complied with this standard. Exhs. EFSB-G-5; EFSB-PA-2.

G. The Project Will Increase the Capacity of the System to Interconnect Large Electricity Customers, Electric Vehicle Supply Equipment, Clean Energy Generation, Clean Energy Storage or Other Clean Energy Generation Sources or Will Facilitate the Electrification of the Building and Transportation Sectors.

As a DER project, the Project inherently complies with this standard. Exh. EFSB-G-5.

H. The Company Duly Considered any Cumulative Burdens on the Host Community and Efforts that Must Be Taken to Avoid or Minimize or, if Impacts Cannot Be Avoided or Minimized, Effort to Mitigate Such Burdens.

The Project will not result in any meaningful cumulative burdens on the Town and potential impacts have been avoided, minimized or mitigated to the extent practicable: (1) there will be no significant impacts to air, water quality or regulated resources resulting from the Project; (2) there will be no change in power loads at the Substation and, accordingly, no increase in electric and magnetic fields resulting from the operation of the Substation Expansion; (3) the Substation Expansion is not within a mapped flood zone and there are no ACECs near the Substation; (4) archeological resources will not be impacted; (5) construction noise will comply with state and local standards; (6) the Company will work with municipal officials to minimize traffic impacts during construction; (7) the Substation Expansion is a continuation of the existing use of the Substation Site and the Substation Expansion is not likely to be visible from the nearest residences; and (8) the Project will not be a burden on the Town's infrastructure (i.e., water, sewer, etc.). Exh. EV-1, at 26-38; Exh. EFSB-G-5.

Based on the above, the Company has demonstrated that the Project complies with the standards set forth in G.L. c. 164, § 69H.

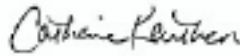
VII. CONCLUSION

For the foregoing reasons, Eversource respectfully requests that the Siting Board grant the requested individual and comprehensive exemptions from the operation of the Zoning Bylaw of the Town of Blandford pursuant to G.L. c. 40A, § 3.

Respectfully submitted,

**NSTAR ELECTRIC COMPANY d/b/a
EVERSOURCE ENERGY**

By its attorneys,



Catherine J. Keuthen, Esq.
Cheryl A. Blaine, Esq.
Keegan Werlin LLP
One Cranberry Hill, Suite 304
Lexington, MA 02421
(617) 951-1400

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