

**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

**SUPPLEMENTAL 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

Dated: July 17, 2026

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 Siting Board conducted the evidentiary hearing on the Company’s Petition on June 9, 2026. One of the record requests propounded by the Siting Board during the evidentiary hearing was Record Request EFSB-04, which requested that the Company: (1) quantify the loss of carbon sequestration associated with both tree removal and construction-based land and soil disturbances during construction of the Project; and (2) describe and quantify how the Project would impact the overall carbon intensity of electricity in Massachusetts. The Company provided a response to the record request on June 22, 2026. By email dated June 26, 2026, the Siting Board staff sought clarification of the Company’s response and requested that the Company: (1) provide quantitative estimates of the loss of carbon sequestration associated with both tree removal and construction-based land and soil disturbances; and (2) clarify the reduction in carbon footprint and provide a quantitative estimate of how the Project would impact the overall carbon intensity of electricity in Massachusetts. The Company provided a supplemental response on July 13, 2026.

The Company filed its Initial Brief on June 30, 2026, excepting the topic of impacts from tree removal. As per its email of June 29, 2026, wherein it reserved the right to file a

supplemental brief on this topic once Record Request RR-EFSB-4(S1) was filed, the Company submits this Supplemental Brief, which demonstrates that the interconnection of distributed energy resources (“DER”) by operation of the Project will not only mitigate any negative impacts of tree removal and construction-based land and soil disturbance associated with the construction of the Project, but provide a significant net reduction in greenhouse gas (“GHG”) emissions.

II. THE PROJECT WILL RESULT IN A NET CUMULATIVE GREENHOUSE GAS REDUCTION

The Substation Site is approximately 2.8 acres in size. 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 Project will require the removal of 94 trees on approximately 0.09 acres of land on the Substation Site. Exh. RR-EFSB-4(S1). This area will remain largely unvegetated for the life of the Substation. Id. The Substation Expansion will also result in the disturbance of an additional 0.48 acres of largely unvegetated soil, a portion of which will be paved. Id.

The Project did not meet or exceed any thresholds that required review under the Massachusetts Environmental Policy Act (“MEPA”), including for land alteration. Exh. RR-EFSB-4. Thus, it also did not trigger any requirement to quantify GHG emissions per MEPA’s GHG Emissions Policy, which applies only to projects that meet or exceed MEPA review thresholds and that require the preparation of an Environmental Impact Report. Id.

The very purpose of the Substation Expansion is to enable the interconnection of low carbon electric generation and energy storage projects (i.e., DER projects) that are currently in the interconnection queue in the Plainfield-Blandford Area. D.P.U. 20-75-B (2021); D.P.U. 22-52; Exh. EV-1, at 2-3; Exh. RR-EFSB-4)(S1). Doing so will reduce the carbon intensity of the

regional energy mix by reducing dependency on electricity generated from fossil fuels. Id. This is supported by the Company's quantification of the loss of carbon sequestration associated with both tree removal and construction-based land and soil disturbances required during construction of the Project and because the Project will reduce the overall carbon intensity of electricity in Massachusetts.

The Company estimates that the tree removal and construction-based land and soil disturbances associated with the construction of the Project are expected to increase direct CO₂e emissions by approximately 18.96 metric tons (20.9 U.S. tons) over its 30-year lifespan.¹ Exh. RR-EFSB-4(S1).

However, as noted above, the Project will enable interconnection of new non-emitting electric generation and energy storage resources, which will result in a reduction of emitting resources.² Exh. RR-EFSB-4(S1). Eversource estimated the Project's impacts on Massachusetts electricity emissions by assuming that 8 MW of Project-enabled solar and storage (i.e., the amount of MW currently in the Group 1 Study queue) displaces average hourly Massachusetts generation and the associated emissions in 2029 (the year the expanded substation will be able to interconnect the 8 MW of DER currently in the queue). Id. The Company simulated a solar and storage operation profile where the solar and storage are operated to minimize system costs, constrained such that the storage is allowed to charge only from the solar and the storage plus solar dispatch is never allowed to exceed the 8 MW of solar capacity. Id. Avoided system

¹ CO₂e (carbon dioxide equivalent) is a standardized metric that measures the total climate warming impact of all greenhouse gases combined, of which carbon dioxide (CO₂) is the most abundant GHG.

² The wholesale electric energy market overseen by ISO New England selects the resource mix that serves demand at the least cost. Exh. RR-EFSB-4(S1). Non-emitting generation resources have lower marginal costs than emitting generation resources. Id. When the least-cost resource mix is selected, the new non-emitting generation resources displace higher cost emitting generation resources. Id. As a result, regional power sector air emissions decline when higher-cost emitting resources are substituted with lower-cost non-emitting resources.

emissions are the product of expected generation enabled by the Project and the hourly 2029 system emission rate in Massachusetts. Id. Eversource estimates emissions from electricity generation in Massachusetts to decline by approximately 3,700 metric tons (4,079 U.S. tons) of CO₂ in 2029 alone.³ Id. Future impacts beyond 2029 would depend on how supply and demand evolve over time and the continued operation of facilities each year that have been enabled by the Project. Id. The carbon intensity of electricity in Massachusetts will be further reduced if, as expected, the additional approximately 32 MW of interconnection capability enabled by the Project is used by new non-emitting resources. Id.

Thus, the Project's impact on the overall carbon intensity of electricity in Massachusetts (i.e., the displacement of approximately 3,700 metric tons (4,079 U.S. tons) of CO₂ in the expanded Substation's first year of operation) greatly outweighs the loss of approximately 18.96 metric tons (20.9 U.S. tons) of CO₂e carbon sequestration resulting over the station's 30-year lifespan resulting from tree removal and construction-based land and soil disturbances associated with the construction of the Substation.

III. CONCLUSION

For the foregoing reasons in addition to the recitation of record evidence in the Company's Initial Brief, 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.

³ It is important to note that Massachusetts is part of a regional electricity grid, and that the system emissions rate is calculated on a regional basis. Massachusetts' share of regional air emissions is a more accurate basis for estimation than only evaluating the native generation resources located in the Commonwealth.

Respectfully submitted,

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

By its attorneys,

A handwritten signature in cursive script, reading "Catherine Keuthen", positioned below a horizontal line.

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