

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

)	
Petition of New England Power Company d/b/a)	
National Grid Pursuant to G.L. c. 164, § 72 for)	D.P.U. 25-16
Approval to Construct, Operate and Maintain)	
Overhead Transmission Lines)	
)	

**PETITION OF NEW ENGLAND POWER COMPANY d/b/a NATIONAL GRID FOR
APPROVAL PURSUANT TO G.L. c. 164, § 72 TO CONSTRUCT, OPERATE AND
MAINTAIN OVERHEAD TRANSMISSION LINES**

Now comes New England Power Company d/b/a National Grid (“NEP” or the “Company”) seeking a determination from the Department of Public Utilities (the “Department”) that, pursuant to G.L. c. 164, § 72 (“Section 72”), the Company’s proposal to remove the existing overhead 69 kV E5/F6 lines (“Existing Lines”) and three associated tap lines (“Existing Taps”) and to rebuild, operate and maintain them (“Rebuilt Lines” and “Rebuilt Taps”) within the existing electric transmission line rights-of-way (“ROW”) in Millbury, Auburn, Leicester, Spencer, East Brookfield, North Brookfield, West Brookfield, Ware, Belchertown, Pelham, Shutesbury, Leverett, Sunderland, Deerfield, Conway, Shelburne and Buckland (the “Central to Western Massachusetts Energy Improvement Project” or the “Project”) is necessary, serves the public convenience and is consistent with the public interest. The Existing Lines are approximately 67 miles long. The Existing Taps each consist of two parallel single circuit lines and range from 0.1 to 0.5 miles in length. The Rebuilt Lines and Taps will consist of new transmission structures and conductor that will be operated at 69 kV but will comply with NEP’s 115 kV design standards should operation at a higher capacity be needed in the future. The Project also includes removal of the Existing Lines and Taps and the construction, reestablishment and improvement of access routes. In support thereof, the Company states as follows:

1. NEP, with a principal place of business at 170 Data Drive, Waltham, MA, 02451, is an electric company as defined by G.L. c. 164, § 1 and, therefore, is authorized to transmit electricity. See New England Power Company d/b/a National Grid, EFSB 19-04/D.P.U. 19-77/19-78, at 129-31 (2021) (“NEP Beverly-Salem”); New England Power Company d/b/a National Grid, D.P.U. 19-16, at 5-6 (2020) (“NEP Golden Rock”).

2. NEP is represented by David Waterfall, Esq., Senior Counsel, National Grid, 170 Data Drive, Waltham, MA, 02451 and Catherine J. Keuthen, Esq., and Cheryl A. Blaine, Esq., Keegan Werlin LLP, 99 High Street, Suite 2900, Boston, MA 02110.

3. The Project satisfies the Department’s standards under Section 72 because the Project is needed and will serve the public interest by increasing the reliability of NEP’s transmission system in central Massachusetts.

4. Simultaneously herewith, the Company is also filing: (i) a petition with the Energy Facilities Siting Board (the “Siting Board”) requesting approval to construct, operate and maintain the Project pursuant to G.L. c. 164, § 69J (the “Section 69J Petition”) (EFSB 25-01); and (ii) motions with the Department and the Siting Board requesting the referral of the Section 72 Petition to the Siting Board and the consolidated review of the related petitions by the Siting Board. G.L. c. 25, § 4; G.L. c. 164, § 69H; NEP Beverly-Salem, EFSB 19-04/D.P.U. 19-77/19-78 at 6 (2021); NEP IRP at 3; NEP Salem at 3.

5. Pursuant to G.L. c. 164, § 72, an electric company seeking approval to construct a transmission line must file a petition with the Department for:

[A]uthority to construct and use or to continue to use as constructed or with altered construction a line for the transmission of electricity for distribution in some definite area or for supplying electricity to itself or to another electric company or to a municipal lighting plant for distribution and sale . . . and shall represent that such line will or does serve the public convenience and is consistent with the public interest . . . The department, after notice and a public hearing in one or more of the towns affected, may determine that said line is necessary for

the purpose alleged, and will serve the public convenience and is consistent with the public interest.

6. In making a determination under G.L. c. 164, § 72, the Department considers all aspects of the public interest. Boston Edison Company v. Town of Sudbury, 356 Mass. 406, 419 (1969); NEP Beverly-Salem at 129; NEP Golden Rock at 6. All factors affecting any phase of the analyses performed by a company in connection with the public interest and public convenience are weighed fairly by the Department in a determination under G.L. c. 164, § 72. Town of Sudbury v. Department of Public Utilities, 343 Mass. 428, 430 (1962).

7. In evaluating petitions filed under G.L. c. 164, § 72, the Department examines: (1) the need for, or public benefits of, the present or proposed use; (2) the environmental impacts or any other impacts of the present or proposed use; and (3) the present or proposed use and any alternatives identified. NEP Beverly-Salem at 130; NEP Golden Rock at 6. In determining whether a proposed project is reasonably necessary for the public convenience or welfare, the Department balances the interests of the general public against the local interests and determines whether the line is necessary for the purpose alleged and will serve the public convenience and is consistent with the public interest. Id. The Department undertakes “a broad and balanced consideration of all aspects of the general public interest and welfare and not merely examination of the local and individual interests that might be affected.” New York Central Railroad v. Department of Public Utilities, 347 Mass. 586, 592 (1964).

8. The Siting Board Petition, which includes a document entitled *Central to Western Massachusetts Energy Improvement Project Application* (the “Application”), is incorporated herein by reference and made a part hereof. The Project is more particularly described in Section 1 of the Application. The Application provides the factual basis for NEP’s conclusion that the Project meets the Department’s standards relative to public convenience and necessity under G.L. c. 164, § 72

because the Project is necessary to provide a reliable energy supply for the Commonwealth while minimizing cost and environmental impacts. Comprehensive information regarding the need for the Project is set forth in Section 2 of the Application. As discussed more fully in that section, the Existing Lines and Taps must be rebuilt because they are approaching the end of their asset life and have intrinsic flaws in their structural configuration, which has resulted in poor reliability. In addition, the Existing Lines and Taps do not have sufficient thermal capacity to support the connection of proposed and future distributed energy resources (“DER”) to the electric grid. Even without proposed DER, equipment at multiple substations served by the Existing Lines would be subject to low voltage conditions under certain contingencies. The Rebuilt Lines will also increase fiber optic capability, which will both protect the lines from lightning and improve telecommunications, resulting in improved reliability.

9. NEP comprehensively identified and analyzed various alternatives to address the identified needs for the Project. In order to determine the approach that best balances reliability, cost, and environmental impact, NEP evaluated a series of project approach alternatives for their potential to address the needs identified. Section 3 of the Application describes the detailed analyses undertaken by NEP to identify and evaluate alternative means to address the needs identified in Section 2, including: (1) a no-build alternative; (2) non-wires alternatives; (3) two partial rebuild alternatives; and (4) a complete rebuilding of the Existing Lines.

10. As described in Section 3 of the Application, NEP’s Application shows that construction of the Project is the best approach to meeting the identified need based on a balancing of reliability, cost, and environmental impacts.

11. After determining that the Project was the superior alternative for meeting the identified need, the Company considered two transmission structure design alternatives: one that complies with NEP’s 115 kV design standards, and a second that complies with NEP’s 69 kV

design standards. As discussed in Section 3 of the Application, the Company concluded that rebuilding the Existing Line in the same ROW, using a 115 kV structure design, would best address the identified needs at a low cost while minimizing environmental impacts and allow NEP to adapt its transmission network to future demands without undertaking costly upgrades that result in further impacts at a later date.

12. NEP also has conducted a detailed analysis of the environmental impacts of the Project, has identified the relevant impacts and has proposed measures to minimize impacts associated with the construction and operation of the Project. Overall, NEP's analysis demonstrates that the Project will achieve an appropriate balance among conflicting environmental concerns as well as among environmental impacts, reliability, and cost. Comprehensive information regarding the minimization of impacts is set forth in Section 4 of the Application.

13. As required under Section 72, and in support of this Petition, a description of the Project and an estimate of its costs are included in the Application. The Department's Section 72 Checklist is provided as Attachment A to this Petition and a draft hearing notice (including an electronic version in MS Word format) is being provided as Attachment B. In further compliance with the Department's Section 72 Checklist, USGS locus maps and diagrams of the proposed transmission line routes can be found in Appendix 5-1 of the Application. A list of all permits required for the Project is found in Section 6 of the Application.

14. Lastly, a copy of NEP's Expanded Environmental Notification Form ("EENF") submitted pursuant to the Massachusetts Environmental Policy Act on August 15, 2024, and the Certificate of the Secretary of Energy and Environmental Affairs on the EENF dated September 30, 2024, are provided as Appendix 6-1 and Appendix 6-2, respectively, of the Application. Draft Section 61 findings are provided in Section 7 of Appendix 6-1. The Secretary approved the Company's request to file a Single Environmental Impact Report.

WHEREFORE, NEP respectfully requests that the Department, pursuant to G.L. c. 164, § 72, and after due notice and a public hearing, determine that the construction of the Project is necessary for the purposes stated, will serve the public convenience and will be consistent with the public interest, and thus, authorize NEP to construct and operate the Project.

Respectfully Submitted,

**NEW ENGLAND POWER COMPANY d/b/a
NATIONAL GRID**

By its attorneys,



David Waterfall, Esq.
National Grid USA Service Company, Inc.
d/b/a National Grid
170 Data Drive
Waltham, MA 02451
(781) 902-4208

and



Catherine J. Keuthen, Esq.
Cheryl A. Blaine, Esq.
Keegan Werlin LLP
99 High Street, Suite 2900
Boston, MA 02110
(617) 951-1400

Dated: March 13, 2025