

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of New England Power Company)	
d/b/a National Grid for Approval to)	
Construct, Operate and Maintain a New 115 kV)	D.P.U. 22-95
Transmission Line on an Existing Right-of-Way)	
in Somerset and Fall River, Massachusetts)	
Pursuant to G.L. c. 164, § 72)	

**PETITION OF NEW ENGLAND POWER COMPANY d/b/a NATIONAL GRID FOR
APPROVAL PURSUANT TO G.L. c. 164, § 72 OF A NEW 115 kV TRANSMISSION
LINE**

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”), NEP’s proposal to separate a 1.85-mile segment of its existing N12 and M13 115 kilovolt (“kV”) overhead transmission lines, currently installed on double circuit steel lattice towers, onto two distinct sets of structures (the “Project”), is necessary, serves the public convenience and is consistent with the public interest. The Project will be located within an existing electric transmission line right-of-way (“ROW”) that extends from NEP’s Pottersville Switching Station in Somerset, Massachusetts, crosses the Taunton River into Fall River, and continues easterly within the ROW to Sykes Road Substation in Fall River.¹ The Project involves the removal of the existing double circuit towers and the construction of two sets of single circuit steel monopoles and conductors to carry the separated N12 and M13 Lines. The Project also includes some minor modifications at the Sykes Road Substation to interconnect the N12 and M13 Lines into the station. In support thereof, NEP

¹ With certain limited exceptions, the Project will be constructed entirely within NEP’s existing ROW.

states as follows:

1. NEP, with a principal place of business at 40 Sylvan Road, 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 S. Rosenzweig, Esq., and Michael J. Koehler, Esq., Keegan Werlin LLP, 99 High Street, Suite 2900, Boston, MA 02110; and Marisa L. Pizzi, Esq., Senior Counsel, National Grid, 40 Sylvan Road, Waltham, MA 02451.

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 the Southeastern Massachusetts – Rhode Island (“SEMA-RI”) area.

4. As described above, the Project, with certain limited exceptions, will be constructed entirely within an existing ROW held by NEP and currently used for transmission purposes. To accomplish the separation, existing Structures 7 through 19 in Fall River will be removed and replaced with two sets of single circuit steel monopoles and conductors. At the Taunton River crossing, the two existing approximately 300-foot steel lattice towers (Structures 5 and 6) will remain in place and the existing conductors that cross the river will be electrically connected to become the N12 Line. Two new Y-frame steel monopole river crossing structures will be constructed to carry the M13 Line across the Taunton River. Construction of the Y-frame river crossing structure proposed on the Fall River side of the Taunton River will require additional temporary and permanent property rights from the applicable landowner. The remainder of the Project will be constructed on NEP property and within NEP’s existing ROW.

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 [make an] 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. Attachment A to this Petition, a document entitled *N12/M13 Double Circuit Tower Separation Project: Application to Support the Petition Before the Department of Public Utilities* (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.

9. The Project was first identified as a solution to meet regional transmission system needs in ISO-NE’s “Southeastern Massachusetts and Rhode Island Area 2026 Solutions Study” (“2026 Solutions Study”), issued in March 2017. The continuing need for the Project was confirmed in ISO-NE’s “Southeastern and Rhode Island Area 2029 Needs Assessment Update” (“2029 Needs Update”), issued in October 2020 and based on ISO-NE’s 2020 Capacity, Energy, Loads and Transmission (“CELT”) Report forecasts. As discussed more fully in Section 2, the Project addresses the potential for thermal overloads on NEP’s existing N12 and M13 Lines and Eversource’s existing 115 kV 111, 112, and 114 Lines following a range of N-1-1 contingencies, by eliminating the potential for loss of both the N12 and M13 lines due to a double circuit tower contingency following the loss of another 115 kV line. The Project also addresses the potential for widespread voltage collapse following an N-1-1 contingency at forecasted load levels, and at load levels already experienced in 2020 and 2021. In so doing, the Project supports continued compliance with applicable federal and regional transmission reliability standards and criteria. These system reliability needs are immediate and require resolution by NEP to maintain a reliable

system in the SEMA-RI area.

10. 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-Action Alternative; (2) transmission alternatives; and (3) non-transmission alternatives (“NTAs”) such as new generation, energy efficiency, demand response programs, solar and battery storage systems, and distributed generation. As described in Section 3 of the Application, NEP’s analysis 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. NEP also 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.

12. 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 B to this Petition and a draft hearing notice (including an electronic version in MS Word format) is being provided as Attachment C. 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 Volume II of the Application, including Figure 1-1. A list of all permits required for the Project is found in Section 4 of the Application.

13. Lastly, a copy of NEP's Expanded Environmental Notification Form ("EENF") submitted pursuant to the Massachusetts Environmental Policy Act on September 30, 2021, as well as the Certificate of the Secretary of Energy and Environmental Affairs on the EENF dated November 29, 2021, are provided as Appendix 1-1 and Appendix 1-2, respectively, of the Application. The Secretary scoped the Project for the preparation of a Single Environmental Impact Report ("SEIR"), which NEP is in the process of preparing. Because an SEIR is required, NEP is also providing draft Section 61 findings as Attachment D to this Petition.

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

-and-



Marisa L. Pizzi, Esq.
National Grid USA Service Company, Inc.
d/b/a National Grid
40 Sylvan Road
Waltham, MA 02451
(781) 907-2114

Dated: August 5, 2022