

Mr. Matthew Nelson
Chair Department of Public Utilities,
Department of Public Utilities
1 South Station, 5th Floor
Boston, MA 02110

April 6, 2022

Dear Mr. Nelson:

As National Grid comes before the Beverly City Council to ask for permission to be granted location permits on April 19th at 8:00, we appeal to you, member of the board that approved this project siting, our public representative, to take the necessary time to review all the options available. While the current redundant back-up N192 line was built in the 1970's and is in need of replacement, we do know that the line is currently working. We also know that while National Grid may need to coordinate the maintenance and repair of this line with both the MBTA and a specialized construction team, the line remains operational and serviceable.

Let's take the time and get this right!

We have heard about why National Grid vigorously opposes the use of the existing railroad right of way and we know that wherever the new line is constructed we run the risk of alienating our neighbors who take sides to keep it out of their backyards.

That said, a closer look at your decision (the Massachusetts Energy Siting Board (EFSB) October 8, 2021) suggests that the chosen path through the City streets may not be the least expensive and least impactful.

The EFSB decision highlights the **King Street Alternative**¹ which runs from the East Beverly Substation to King Street in Groveland. This project solution is viable and meets the EFSB criteria as the lowest cost and the least impactful.

King Street Alternative Category Scoring Criteria²

Cost \$149 Million³

- At \$149 Million, this is less than the \$200 Million estimated cost for the current proposal which includes the EFSB estimated mitigation costs to protect the project site from the effects of climate change⁴.

¹ October 8, 2021, EFSB Final Decision 19-04, p. 22.

² October 8, 2021, EFSB Final Decision 19-04, Table 3. Route Scoring Criteria and Corresponding Weights, p. 34.

³ October 8, 2021, EFSB Final Decision 19-04, Table 2.

⁴ Transcripts from the EFSB's meetings with reference to efforts to ensure the reliability and sustainability of the project added an estimated \$100 million dollars to the \$99 million dollar project listed in Table 2. This means the current project is now estimated to be \$199 million dollars, significantly higher with potentially far more irreversible environmental impacts than the King Street Alternative.



Let's work together to focus on a more resilient solution.

It is time to look more closely at the **King Street Alternative**. This path is more resilient, offers a solution at a lower cost with less impacts to our environment. This path avoids urban locations with the constructability challenges associated with congested city infrastructure and provides a safer, healthier solution for Beverly's residents.

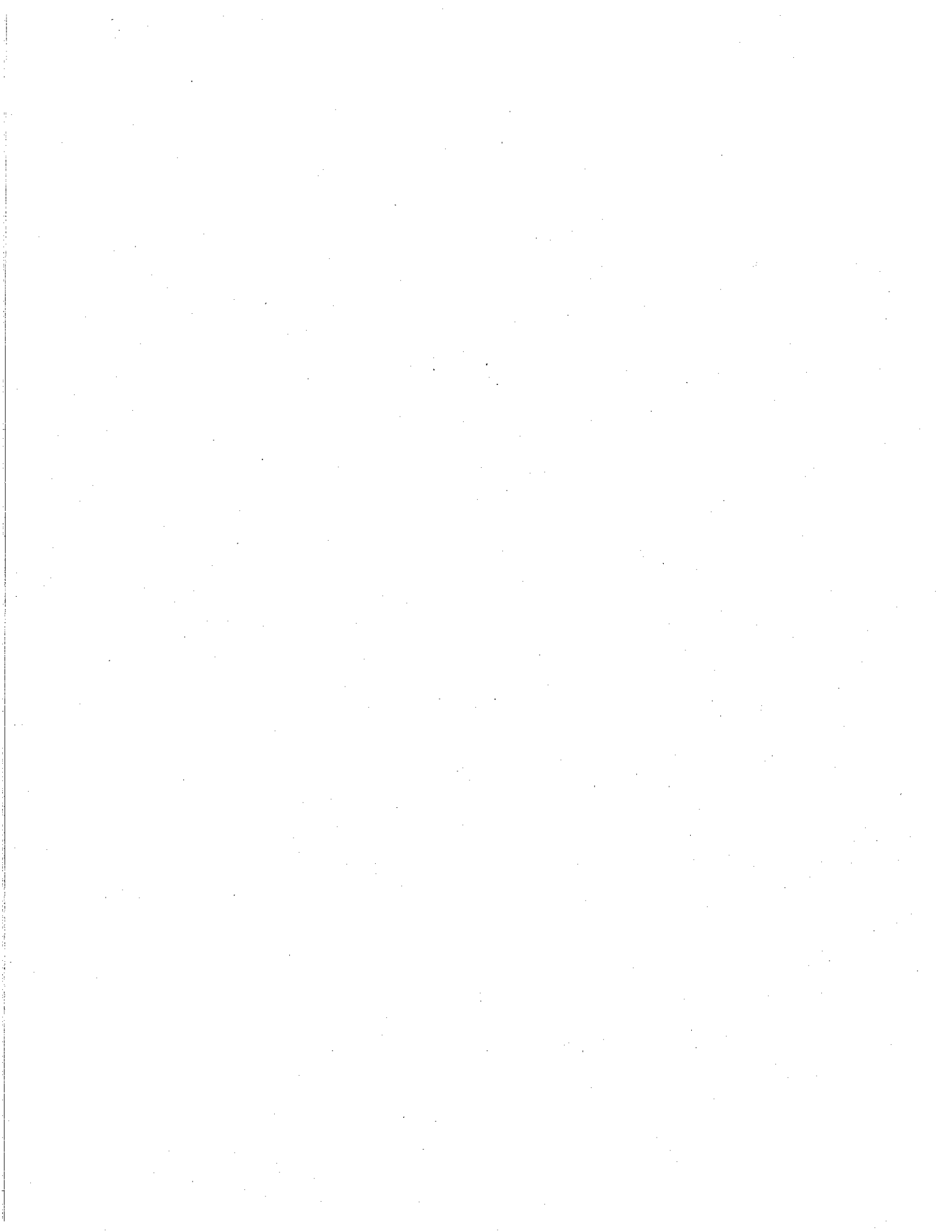
Respectfully Submitted,

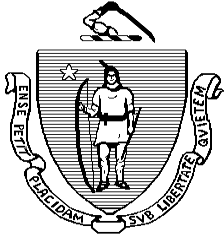
Jim Younger for the

Beverly Regional Transmission Reliability Project Google Group
Reliableenergy101@gmail.com

<https://sites.google.com/view/reliablengrid101/home>

c: Governor Charles Baker
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**THE COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

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CHARLES D. BAKER
GOVERNOR

KARYN E. POLITO
LIEUTENANT GOVERNOR

April 21, 2022

Mr. Jim Younger on behalf of the
Beverly Regional Transmission Reliability Project Google Group
Reliableenergy101@gmail.com

Re: New England Power Company d/b/a National Grid: EFSB 19-04/D.P.U. 19-77/19-78

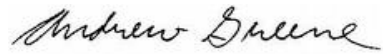
Dear Mr. Younger:

Thank you for your letter of April 6, 2022, regarding New England Power Company d/b/a National Grid: EFSB 19-04/D.P.U. 19-77/19-78. In that correspondence, you state that “It is time to look more closely at the King Street Alternative.” While I appreciate your concerns, it is not possible for the Siting Board to now reassess the benefits of different routes. The Energy Facilities Siting Board’s Final Decision was issued on October 8, 2021; no appeal was taken from that decision; and the time in which an appeal could be filed has long passed. In other words, the Final Decision is now, in fact, final. The Supreme Judicial Court of Massachusetts articulated this principle as follows: “[a] final order of an administrative agency in an adjudicatory proceeding, not appealed from and as to which the appeal period has expired, precludes relitigation of the same issues between the same parties, just as would a final judgment of a court of competent jurisdiction.” Stowe v. Bologna, 415 Mass. 20, 22 (1993).

In the Final Decision, the Siting Board did, in fact, evaluate the merits of the King Street Alternative. Final Decision at 22-23, 26, 28-29. In its evaluation, the Siting Board noted: “An alternative of bringing power to East Beverly from the existing 115 kV King Street Substation in Groveland would involve using a route five times longer than that Project at a cost 50 per cent higher.” Final Decision at 28. Based on this finding, the Siting Board concluded that the route proposed in the Petition is preferable to the King Street Alternative. Final Decision at 29.

I hope this information sheds light on the concerns raised in your email, and helps further explain why the Project, as proposed, and not the King Street Alternative, was approved by the Energy Facilities Siting Board and remains in effect, as per the Final Decision.

Sincerely,

A handwritten signature in cursive script that reads "Andrew Greene".

Andrew Greene, Director
Energy Facilities Siting Board

cc: Service List, EFSB 19-04/D.P.U. 19-77/19-78