



*via email*

May 5, 2022

Attorney J. Raymond Miyares  
Miyares Harrington  
40 Grove Street, Suite 190  
Wellesley, MA 02482

Lisa Kent  
City Clerk  
191 Cabot Street  
Beverly, MA 01915

Re: Petition of New England Power Company for a Grant of Location for Electric  
Transmission Line (N-192 Cable Replacement Project)

Dear Attorney Miyares & Clerk Kent:

In advance of the City Council's May 16<sup>th</sup> continued public hearing, New England Power Company ("Company" or "NEP") writes to provide the following additional information in response to certain comments that arose at the April 19<sup>th</sup> hearing.

1. King Street Alternative

Several commenters recommended that the Company pursue the so-called King Street Alternative. The King Street Alternative would involve installing a combination of overhead and underground transmission circuits from the Company's King Street Substation in Groveland to the East Beverly #51 Substation in Beverly. That alternative was rejected for several reasons. First, it would require the Company to acquire and/or take property in order to expand the existing ROW within Groveland, Georgetown, Boxford, Topsfield, Wenham, and Beverly. Second, the creation of a new overhead line within an expanded ROWs would involve substantial tree clearing, potential permanent wetlands impacts, temporary impacts during construction, wetland buffer zone impacts, riverfront area impacts, floodplain impacts, and impacts to flora and fauna. Third, the King Street Alternative would not provide a new 115 kV supply to the Beverly #12 Substation, which is an important enhancement to system reliability that the Project provides. Ultimately, in its response to Mr. Younger's letter of April 6, 2022 in which he advocated for the King Street Alternative, the Energy Facilities Siting Board summarized the alternative as follows:

"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.

Mr. Younger’s letter and the Board’s response are enclosed.

2. Project Cost

Several people have commented during the hearing that the Project cost is approximately \$200 million. Mr. Younger also highlights that cost in his letter to DPU Chair Nelson. That \$200 million figure is wrong. The Company’s most recent cost estimate was approximately \$91 million (including removal of the existing cable).

3. Referral of Supplemental Materials to City Departments

At the close of the April 19<sup>th</sup> hearing, Council President Flowers stated that the Council would be referring all of the material that the Company submitted in this proceeding to various City departments for review and comment. Respectfully, the Company believes that is unnecessary and would only cause undue delay. As the Company has noted previously, most, if not all, of the supplemental material was not germane to the decision that the Council must make under G.L. c. 166, § 22 regarding the location of the Cable and whether it would incommode the public use of the public way. Further, the supplemental material was prepared in consultation with and/or already has been provided to the relevant City departments. Thus, all City officials have had ample opportunity to review and comment on the materials. Delaying a decision on the Company’s petition for the very same purpose would be redundant and only serve to unduly delay the Project and, thus, extend the ongoing risk to system reliability.

The Company respectfully requests that the City Council take a final vote on the Company’s pending petition at the May 16 public hearing.

Sincerely,



Assistant General Counsel & Director

Enclosures

cc: Tim O’Leary, NEP  
Faith Hassell, NEP