

Wakefield"); New England Power Company d/b/a National Grid, D.P.U. 15-44/15-45 (2016) ("NEP MVRP").

2. NEP is represented by Mark R. Rielly, Esq., Director & Acting Asst. General Counsel, National Grid, 40 Sylvan Road, Waltham, Massachusetts 02451 and by Catherine J. Keuthen, Esq. and Cheryl A. Blaine, Esq., both of Keegan Werlin LLP, 99 High Street, Suite 2900, Boston, Massachusetts 02110.

3. The New Cable satisfies the Department's standards under Section 72 because the Project is needed and will serve the public interest by meeting the long-term needs of the area transmission system. The New Cable is designed to replace the existing N-192 Cable, an aging, difficult-to-access cable with environmental concerns.

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 19-04); (ii) a petition pursuant to G.L. c. 40A, § 3 (the "Zoning Petition") (D.P.U. 19-78); for a determination that certain requested zoning exemptions in connection with the construction of a new switching station in Salem and modifications of an existing NEP-owned substation in Beverly are "reasonably necessary for the convenience or welfare of the public;" and (iii) motions with the Department and the Siting Board requesting the consolidation of these related petitions into one proceeding and the referral of such petitions to the Siting Board for consolidated review. G.L. c. 25, § 4; G.L. c. 164, § 69H; Woburn Wakefield at 4-5; New England Power Company d/b/a National Grid, EFSB 09-1/D.P.U. 09-52/D.P.U. 09-53, at 2 (2011).

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:

Authority 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. The Department, in making a determination under G.L. c. 164, § 72, considers all aspects of the public interest in making a determination under G.L. c. 164, § 72. Boston Edison Company v. Town of Sudbury, 356 Mass. 406, 419 (1969); Woburn-Wakefield at 151-52; NEP MVRP at 67. 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 present or proposed use and any alternatives identified; (2) the need for, or public benefits of, the present or proposed use; and (3) the environmental impacts or any other impacts of the present or proposed use. Woburn-Wakefield at 152; NEP MVRP at 67.

8. 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 interest and determines whether the line is necessary for the purpose alleged and will serve the public convenience and is consistent with the public interest. Woburn-Wakefield at 151-52; NEP MVRP at 67. 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); see Woburn-Wakefield at 142.

9. The Section 69J Petition, which includes the *Beverly Regional Transmission Reliability Project Application* (the “Application”) in support thereof, 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 the Company’s conclusion that the Project meets the standards of the Siting Board and Department under G.L. c. 164, §§ 69J and 72, respectively, because the Project is necessary to provide a reliable energy supply for the Commonwealth while minimizing cost and environmental impacts.

10. Comprehensive information regarding the need for the Project is set forth in Section 2 of the Application. The Project is needed to: (1) maintain the integrity of NEP’s electric system by replacing the existing N-192 Cable, which has reached the end of its useful life; and (2) improve the reliability of the electric system serving Beverly and the Cape Ann area (Beverly, Essex, Gloucester, Hamilton, Manchester-by-the-Sea, Rockport and Wenham) by introducing a second source of power to the Beverly #12 Substation. The Project will address existing distribution planning criteria violations and the potential for thermal overloads on Substation equipment. The need for the Project is more specifically described in Section 2 of the Application.

11. In addition to the Company’s proposed Project, the Company identified and analyzed various project alternatives to address the established need for an additional energy resource, including: (1) a no-build alternative; (2) non-wires alternatives; (3) underground transmission solutions; (4) overhead and hybrid transmission alternatives; and (5) transmission alternatives using the active railroad right-of-way owned by the Massachusetts Bay Transportation Authority. The Company’s proposed Project best meets the needs identified in Section 2 of the Application while balancing reliability, cost and environmental considerations. The Company’s analysis of Project alternatives is described in Section 3 of the Application.

12. The Company also undertook a thorough and objective analysis to determine the least costly, most reliable, feasible routes for the New Cable that would result in the least environmental impact with respect to the construction and operation of the Project. The Company's analysis compared routing alternatives based upon human, environmental, constructability, cost and reliability considerations. Through this process, the Company identified a Preferred Route and a Noticed Alternative Route. The Company's selection of the Preferred Route reflects a balancing of established environmental criteria, cost and reliability. The proposed routes studied by the Company are more particularly described in Section 4 of the Application.

13. The Company has conducted detailed analyses of the environmental impacts of the Project, identified the relevant impacts and proposed measures to avoid, minimize or mitigate impacts associated with the construction and operation of the Project. Comprehensive information regarding the minimization of impacts for the Project is set forth in Section 5 of the Application.

14. 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 along with the Section 69J Petition. In further compliance with the Department's Section 72 Checklist, Figure 1-1 of the Application is a USGS locus map of the New Cable and diagrams of the proposed transmission line routes can be found in Appendix 5-2 of the Application. Appendix 6-1 of the Application is a copy of the Environmental Notification Form ("ENF") for the Project and Appendix 6-2 of the Application is a copy of the March 8, 2019 Secretary's Certificate on the ENF, determining that the Project does not require the filing of an Environmental Impact Report. Tables 6-1, 6-2 and 6-3 of the Application list all permits required for the Project.

WHEREFORE, the Company respectfully requests that the Department (or, as appropriate, the Siting Board), pursuant to its authority under 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 and will serve the public convenience and be consistent with the public interest, and thus, authorize the Company to construct and operate the Project.

Respectfully Submitted,

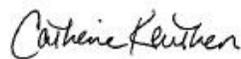
**NEW ENGLAND POWER COMPANY
d/b/a NATIONAL GRID**

By its attorneys,



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