Comments on Dashboard Straw Poll https://www.mass.gov/doc/2024-ca-dashboard-rfc-english/download

Comments by Michael DeChiara, ██████████
████████████

1. The legislative language requires the Dashboard provided information for the "most recent reporting period." What could this reporting period be?

The statutory language, as the Straw Poll confirms, is to have the division provide *"real time"* online data. So I think the question of what the recent period should be is not the right question. In fact the cited language in the Straw Poll indicates the "most recent reporting period" is a minimum. Reporting also implies that progress has already been made on a project. This is too late.

Instead I would focus on data being available starting with the pre-application period. The statutory language states that a goal of the dashboard is "facilitating community input into the siting and permitting of clean energy infrastructure'. If community input is to be meaningful and timely, it must begin immediately so that any pre-application related documentation is available to the community so it can provide the intended input. Once a permit is approved and construction is occurring, it is too late. If the idea is to help community engagement by providing accessible Information about projects, then this information should be available online as soon as an application becomes officially recognized by EFSB; this hopefully will be in the pre-application phase.

Statute requires aggregated information as well. As noted in the Straw Poll, the following. This data can and should be uploaded in real time with functionality to sort or analyze by customized time periods, perhaps with pre-programmed periods.
• Number of applications deemed incomplete - *reporting within days/week of determination or until the status is changed to complete.*
• Number of applications constructively approved - *reporting with days/week of determination*
• Average duration of application review - *ability to analyze by custom date range*
• Average staffing levels delineated by job classification - *not a concern of mine, so no comment.*

To be specific, just like one can review credit card transactions based on a custom date range or pre-defined options like by last quarter, last fiscal year, since last statement, so too should project information be available. This should be technically easy to achieve if the application that is developed by EFSB requires dates and sortable/filterable fields.

• **What specific design features should the Dashboard have?**

Related to the focus on enabling meaningful community input, the statutory minimum of aggregated information is insufficient. Project-level, disaggregated data is essential. This is the only way that anyone can track a project - whether it be during pre-application, during construction, or during operation.

While there are various ways to provide visual tools to make data accessible to online users, this should be left to both stakeholder feedback (focus groups) and design professionals. What needs to be decided by EFSB, based on statute and is what is achieved by the design and functionality. I would suggest the following are very important.

- Links to submitted documentation so the public can see and review materials directly
- Ability to download data - both documents and "on the fly" analyses (eg number of projects with x status in last calendar year)
- Ability to make project comparisons to enable analysis of a particular project
- The ability to see trends.
- The ability to map projects and offer layers (see Mass. biomap mapping for example). This allows zooming in and zooming out as needed.

Also to reiterate from the Straw Poll - "Design and content of the dashboard informed by a stakeholder process." This review process must be inclusive of community and municipal stakeholders beyond the Administration or the developer/applicant community.

2. What specific additional content could the Siting Board consider for the Dashboard?

- All pre-application required material - documentation of meetings, project information shared at this stage including images
- Contact information for the applicant, operator and other key entities
- As much financial data regarding the project as publicly possible
- The status of third-party processes - esp. dates and status related to interconnection agreements or other utility based processes
- Dates and status of permit requests and submissions
- Dates of public hearings or submissions related to the project - with sufficient notice for an interested party to participate

While related to the question of content, a larger issue is EFSB not allowing developers to limit content made available to the public under the guise of proprietary information. While there can be legitimate need for some information to be limited, most should be available in the public realm. There is little project design information that is unique to a developer. Similarly cost and environmental impact information is important for public input. I would suggest that submissions made to EFSB should be presumed to be public records with the exception being documents that are excluded, rather than the inverse.

3. What are examples of Dashboards that the Siting Board and its consultant should Consider?

This would take some work and I would assume there is no single website that will have everything.

In reviewing the examples listed in the Straw Poll (DPU Pipeline Safety Division, U.S. EPA, City of Boston Planning Department, and federal Permitting Council), none were particularly good. Some looked good like the Permiting Council but it was flat with no ability to access underlying background documentation. The City of Boston was promising but the site did not work. The EPA had good categories of data but was high level information with no ability to get underlying documentation.

The DPU File Room has access to some good information but it is not user friendly in design.

• Other states use interactive maps to display the location of energy projects under review.What concerns, if any (e.g., critical energy infrastructure information ("CEII"), confidential/competitive business interests), do agencies, developers or distribution companies have about displaying spatial data of proposed projects on an interactive Dashboard?
The only reason I can think of for not providing detailed mapping is to prevent terrorist attacks against vital infrastructure. But the level of mapping that would be provided on this site would likely not be the source of such a weakness.