



2024 Climate Act:

Proposed EFSB Regulation 980 CMR 15.00

CUMULATIVE IMPACT ANALYSIS AND STANDARDS FOR APPLYING SITE SUITABILITY CRITERIA

**Energy Facilities Siting Board Meeting
December 15, 2025**



Agenda

- 12:00 Opening
 - 12:00 Energy Facilities Siting Board Chair Remarks
 - 12:15 Staff Tentative Decision Presentation
- 1:25 **Siting Board and Public Comments**
 - 1:25 Board Comments/Questions
 - 1:55 Mid-afternoon Break
 - 2:10 Public Comment
- 2:45 **Board Deliberation and Vote**
- 3:45 **Closing Remarks**



Staff Presentation

1. Presentation of the Tentative Decision
2. Site Suitability Guidance
3. Cumulative Impact Analysis Guidelines
4. EFSB draft Proposed Regulations and CIA Process



Site Suitability Guidance – Changes in Response to Public Comments

- **Required with Cumulative Impact Analysis**

- Facilities that are required to perform a CIA will be required to complete a Site Suitability Report, unless they qualify for an exemption

- **Site Suitability Mapping Tool Functionality**

- Applicants (and other interested parties) will be able to self-score by drawing project footprint on map and/or importing a shapefile
- Eliminates need for third-party score reviewer

- **Pre-filing Requirements**

- Applicants must provide anticipated Criteria-specific Suitability Scores in stakeholder meetings conducted during pre-filing

- **Application Requirements**

- Applicants must provide a Site Suitability Report as part of application
- Includes Criteria-specific Suitability Scores, proposed Score Modifiers, proposed minimization and mitigation measures, and other information in a form and manner prescribed by EFSB

- **Requests for Score Review by Siting Division Director**

- Must be submitted by Applicant, Local Government, or Key Stakeholder within 30 days of Application submittal
- Scores can only be adjusted due to materially erroneous, incomplete, or otherwise faulty data
- Director shall issue a decision not more than 30 days after receipt of request



Site Suitability Guidance – Other Potential Changes Still Under Review

- **Elimination of Total Site Suitability Score as a factor**
- **Changes to application of Score Modifiers**
- **Changes to Climate Resilience Standards**
- **Changes to interpretation of Criteria-specific Suitability Scores**
- **Other Clarifications**
 - Definition of what constitutes “newly established public right of way” (“ROW”)
 - Scoring for facilities whose Site Footprint intersects with protected open space, in particular, Article 97 land
 - Intersection of Guidance with other state environmental protection laws



Commonwealth of Massachusetts

Executive Office of
Energy and Environmental Affairs

MassEnviroScreen

Office of Environmental Justice and Equity

December 15, 2025





Policy Context: The 2024 Climate Act

AN ACT PROMOTING A CLEAN ENERGY GRID, ADVANCING EQUITY AND PROTECTING RATEPAYERS

- The **2024 Climate Act** directs the Office of Environmental Justice and Equity to:
 - I. Implement environmental justice principles in the operation of each office and agency under the executive office
 - II. Develop guidance on cumulative impact analysis (CIA) for use in siting and permitting decisions.
- OEJE has led the development of the CIA guidance, including research, framework design, and stakeholder engagement
- OEJE and the DPU Siting Board Staff have been in continuous coordination to ensure CIA guidance aligns with and informs EFSB's CIA regulations
- In support of these efforts, OEJE has developed **MassEnviroScreen** (MES), an interactive mapping tool designed to standardize and streamline data-driven assessment of environmental and health burdens across Massachusetts.



Cumulative Impact Analysis

Statutory Definition of CIA (M.G.L. c. 239, § 69G)

- A **Cumulative Impact Analysis (CIA)** is a written report produced by the applicant that assesses impacts and burdens, including existing environmental burdens and public health consequences, in the specific geographical area where a facility is proposed.
- If the analysis shows the area is subject to **unfair or inequitable environmental burdens or related health consequences**, the report must identify:
 - I. Environmental and public health impacts from the proposed project likely to result in **disproportionate adverse effects**;
 - II. How the proposed project **could increase or reduce the effects of climate change** in that area;
 - III. Proposed **remedial actions** to address any such disproportionate adverse impacts attributable to the proposed project.



How MassEnviroScreen Supports CIA

- Under the 2024 Climate Act, a CIA must identify areas subject to unfair or inequitable environmental burdens or related health consequences.
- The **MassEnviroScreen (MES)** is designed to ensure communities across Massachusetts are evaluated on a uniform basis and to provide a consistent starting point for CIA reports.
- The tool aggregates **30 indicators** across five components- environmental exposures, environmental effects, climate risks, sensitive populations, and socioeconomic factors – to produce a single composite score.
- Communities are designated as **Burdened Areas** when they meet one or both of the following criteria:
 - I. cumulative burden percentile score (i.e, MassEnviroScore) of 75 or greater, OR
 - II. annual median household income is 65 percent or less of the statewide annual median household income



MassEnviroScreen Components

The MassEnviroScreen score reflects two main factors – **pollution and climate burden and population characteristics** – which together are made up of five component scores.

- **Pollution and Climate Burden:**

- **Environmental exposure** indicators: based on measurements of different types of pollution that people may come into contact with.
- **Environmental effects** indicators: based on the locations of toxic chemicals in or near communities.
- **Climate risk** indicators: based on exposures to climate hazards.

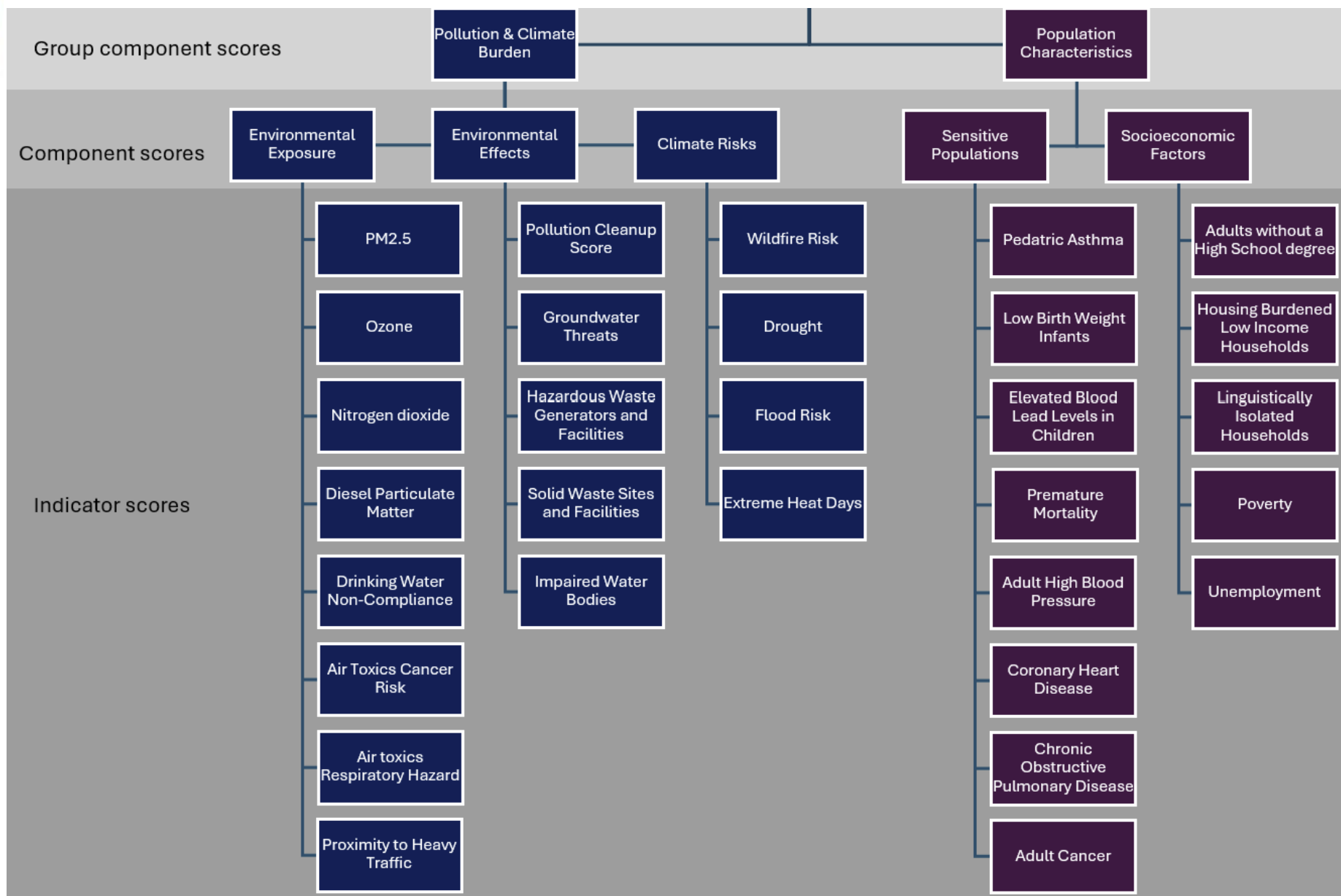
- **Population Characteristics:**

- **Sensitive populations** indicators measure the number of people in a community who may be more severely affected by pollution or climate hazards because of their health.
- **Socioeconomic factor** indicators are conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects.

These components together provide a comprehensive picture of cumulative impact in the Commonwealth.



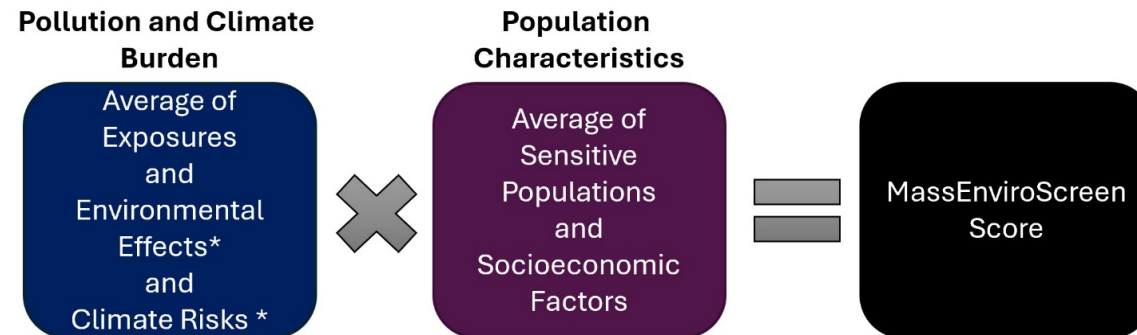
Draft MassEnviroScreen Indicators





MassEnviroScreen Methodology

- Indicators are standardized and combined into component scores
- There are two major components:
 - **Pollution and Climate Burden** = Exposures + Environmental Effects + Climate Risks
 - **Population Characteristics** = Sensitive Populations + Socioeconomic Factors
- The model follows this conceptual formula:



- MassEnviroScreen assigns a cumulative burden score (0 – 100) to every census block group in Massachusetts
- The MassEnviroScreen score also represent percentile ranks, which means that a community's score also indicates the percentage of scores in a group that are equal to or higher than a given score.



Feedback on MassEnviroScreen

- **Overlapping Indicators**
 - Several environmental indicators are highly correlated (e.g. PM 2.5, , diesel particulate matter, traffic proximity)
- **Data Coverage and Geospatial Resolution**
 - Certain datasets are aggregated at larger geographic scales (e.g. census tract)
- **Temporal Limitations of Datasets**
 - Some indicators rely on older datasets, which may not reflect current local conditions.
 - EPA EJScreen datasets are currently only accessibly via archived versions
- **Suggested Additional Indicators**
 - Environmental Effects – Concentration of Clean Energy Infrastructure
 - Sensitive Populations – Age, Disability, Adult Asthma



Addressing Feedback on MassEnviroScreen

- **Indicator Correlation:**

- Intended to capture a full picture of community stressors, not duplication

- **Data Coverage and Geospatial Resolution:**

- MassEnviroScreen uses census block groups, providing more granular data than tools that rely on larger geographic units such as census tracts
- This approach aligns with best practices for cumulative impact mapping across the country, balancing detail and data availability
- CIA guidance and regulations creates a separate pathway for requesting a CIA

- **Data Timeliness:**

- Some indicators employ older datasets and from various years
- MassEnviroScreen uses **the most current available data**

- **Socioeconomic Weighting:**

- Informs vulnerability
- Separate income threshold ensures rural poverty is captured



Updates to MassEnviroScreen & CIA Guidance

- **Increased Transparency:** Technical documentation will more clearly discuss the limitations of screening tools like MassEnviroScreen; these limitations are consistent with tools used in other states and are widely agreed to not be grounds to forego the tools altogether
- **Community Petition Pathway:** Communities not designated as Burdened Areas can request that a CIA be conducted in their area. CIA Guidance and Regulations outlines a mechanism for doing so.
- **Ongoing Improvement of MassEnviroScreen:** OEJE and Siting Board staff intend to establish a forum to address improvements and revisions to the MassEnviroScreen, and ensure all data feeding into the tool is accurate and reflects the most current available information.

MassEnviroScreen is intended to be a starting point that flags areas for further analysis, rather than serve as the sole determinant of cumulative impacts. Decisions will require project-specific analysis and the Board's assessment as detailed in the full CIA process.



EFSB Staff Presentation



Important Dates

| Milestone | Dates |
|--|--|
| Cumulative Impact Analysis Webinar | November 6, 2025 |
| Siting Board Meeting on Opening Rulemaking for 980 CMR 15.00 | December 15, 2025 |
| Siting Board to File Proposed Regulation with the Secretary of State | December 19, 2025 |
| Public Comment Hearings | Monday, February 2, 2026, at 1:00 p.m. and 6:00 p.m. |
| Final Deadline for Written Comments | February 13, 2026 |



Goals of Presentation

- Discuss the integration of Cumulative Impact Analysis and Site Suitability Guidance into the adjudication of energy facilities Applications by the Board
- Describe and illustrate the major CIA steps for energy facilities siting as described in draft proposal for 980 CMR 15.00
- Describe CIA reporting
- Summarize and respond to comments from stakeholders regarding proposed CIA regulation
- Respond to Board questions and comments



Complementary Roles of CIA and Site Suitability

- CIA and Site Suitability generally complement rather than duplicate each other with respect to existing conditions and Project Impacts.
- CIA and Site Suitability are mutually supportive:
 - Both use Indicators and data to quantify environmental and other conditions in a proposed project location and provide a scored result.
 - Both systems use scoring to identify actions to avoid, minimize and mitigate adverse impacts.
 - Both use MassEnviroScreen, to varying degrees.



Complementary Roles of CIA and Site Suitability (Cont'd)

- CIA and Site Suitability expand the understanding of overall Project Impacts
 - CIA focuses on “Burdened Areas” while Site Suitability focuses on the entire Project Site Footprint
 - CIA focuses on: (1) environmental impacts (such as air, water and waste pollutants, and multiple climate change effects); (2) public health consequences; (3) socioeconomic conditions; and (4) a Project’s incremental effects that may “materially exacerbate” Elevated Indicators.
 - Site Suitability focuses on the Project vis-à-vis: (1) development potential (e.g., use of brownfields vs. protected open space); (2) certain measures of climate change resilience (RMAT riverine and coastal flooding); (3) carbon storage; (4), biodiversity; (5) agricultural resources; (6) social and environmental burdens; and (7) social and environmental benefits.
- Both Site Suitability analysis and CIA consider mitigation requirements and adequacy. EFSB considers ecological factors in site/route scoring outside of CIA, and Site Suitability analyzes these factors in its scoring.



Cases That Require a CIA Report or Site Suitability Scoring (**Clean Energy**)

| Energy Facility Type (<u>either</u> Consolidated Permit or Consolidated State Permit) | CIA Report Required? | CIA Remedial Action Required? | Criteria-Specific Site Suitability Scoring Required? |
|---|----------------------|--|--|
| Clean Transmission and Distribution (§§ 69T, 69U) | Yes | Yes, if Project results in a “Disproportionate Adverse Effect” | No, except in a newly established public ROW* |
| Clean Energy Generation (§§ 69T, 69V) | Yes | Yes, if Project results in a “Disproportionate Adverse Effect” | Yes, with limited exceptions* |
| Clean Energy Storage (§§ 69T, 69V) | Yes | Yes, if Project results in a “Disproportionate Adverse Effect” | Yes, with limited exceptions* |

* Certain projects are exempted from the Criteria-Specific Site Suitability Scoring requirements of 225 CMR 29.07(1).



Cases That Require a CIA or Site Suitability Scoring (**Fossil Fuel**)

| Energy Facility Type (not “Clean”) | CIA Report Required? | CIA Remedial Action Required? | Criteria-Specific Site Suitability Scoring Required? |
|--|-------------------------|--|---|
| Transmission Facility (§ 69J) | Yes | Yes, if Project results in a Disproportionate Adverse Effect | No |
| Generating Facility (§ 69J¼) | Yes | Yes, if Project results in a Disproportionate Adverse Effect | No |
| Gas Pipeline or LNG Storage Facility (§ 69J) | Yes | Yes, if Project results in a Disproportionate Adverse Effect | No |



Site Suitability Implementation in Board Application Reviews

- Applicants use the Site Suitability Mapping Tool to derive the anticipated Criteria-Specific Suitability Scores for a proposed CEIF.
- The Applicant files Site Suitability Reports (“SSRs”) with its EFSB Consolidated Permit Application.
- Applicant or Key Stakeholder may request a score revision by the Director if Criteria-Specific Site Suitability Scores are based on materially erroneous, incomplete, or otherwise faulty data.
- Social and environmental benefit criteria score modifier: Criteria-Specific Site Suitability scores may be modified by the Board when an Applicant agrees to provide benefits described in Guidance and upon agreement between the Applicant and the Local Government.
- The Board shall consider the SSR in its route and site scoring analysis, if applicable; Criteria-Specific Suitability Scores are used to inform the Board’s decisions on avoidance, minimization, and mitigation of Project Impacts, and its overall decision on whether to grant a Consolidated Permit.



The CIA Process

- 1) Identify the Specific Geographical Area (“SGA”) of the Project
- 2) Determine whether the SGA overlaps any BAs
- 3) Identify Indicator values and any Elevated Indicators of the BA
- 4) Identify Project Impacts, including Disproportionate Adverse Effects, in the BA related to Elevated Indicators
- 5) Propose remedial actions for any Disproportionate Adverse Effects



Step 1: Identify the SGA of the Project

- Project Applicants must first identify the SGA of the proposed Project based on the Facility Boundary and the following facility-specific radial distances outward from the Facility Boundary.

| Facility Type (or Component of a Facility) | Radial Distance from Facility Boundary* |
|--|--|
| Transmission and Distribution Lines | 1/4 mile |
| Clean Energy Storage Facility | 1 mile |
| Substation | 1/2 mile |
| Ground-Mounted PV | 1/2 mile |
| Onshore Wind Facility/ Anaerobic Digester > 25MW | 1 mile |
| LNG Facility | 1 mile (no Air permit) 2 miles (non-Major Air) |
| Gas Pipeline | 1/2 mile |
| Fossil Generating Facility | 2 miles (non-Major) 5 miles (Major) |
| Gas Compressor Stations | 1 mile (no Air permit) 2 miles (non-Major Air) 5 miles (Major) |

*For Projects that include multiple facility types, the radial distance from the Facility Boundary shall be applicable to each element of the Project. The area bounded by the outermost radial distances from the Facility Boundary comprises the SGA of the Project.



Step 2: Determine if SGA Overlaps with any BAs

- The Project Applicant examines whether the SGA overlaps with any BAs as identified by the MassEnviroScreen.
- A CIA must be completed for any BA that intersects the SGA.
- If the SGA does not intersect any BAs, then no further analysis is conducted (but a CIA Report is required).
- In extraordinary circumstances, upon petition from a Key Stakeholder, the Board may require a CIA pertaining to a Census Block Group that is not a defined BA and that intersects with the SGA.



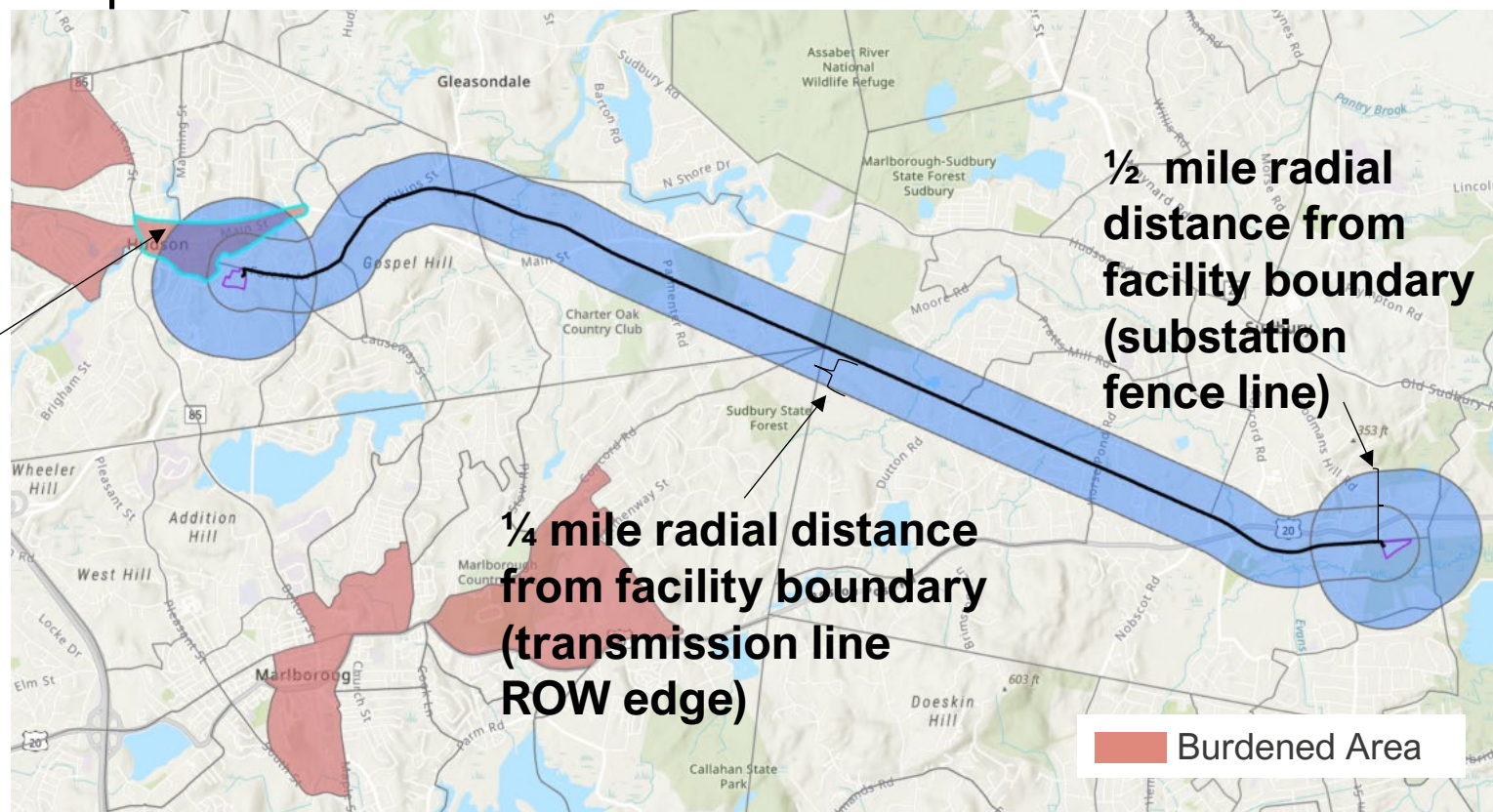
Step 2 Example: Identify any Burdened Areas that Overlap the SGA

- Step 2a: Use MassEnviroScreen (“MES”) Project Draw Function (under development) to overlay Project footprint and SGAs on MES BA Map.
- Step 2b: Identify any overlap between the SGAs and BAs. In this example, one BA (Census Block Group) overlaps the SGA.

This Census Block Group in Hudson is a **Burdened Area that overlaps the SGA.**

A BA is a Census Block Group that meets one or both of the following criteria:

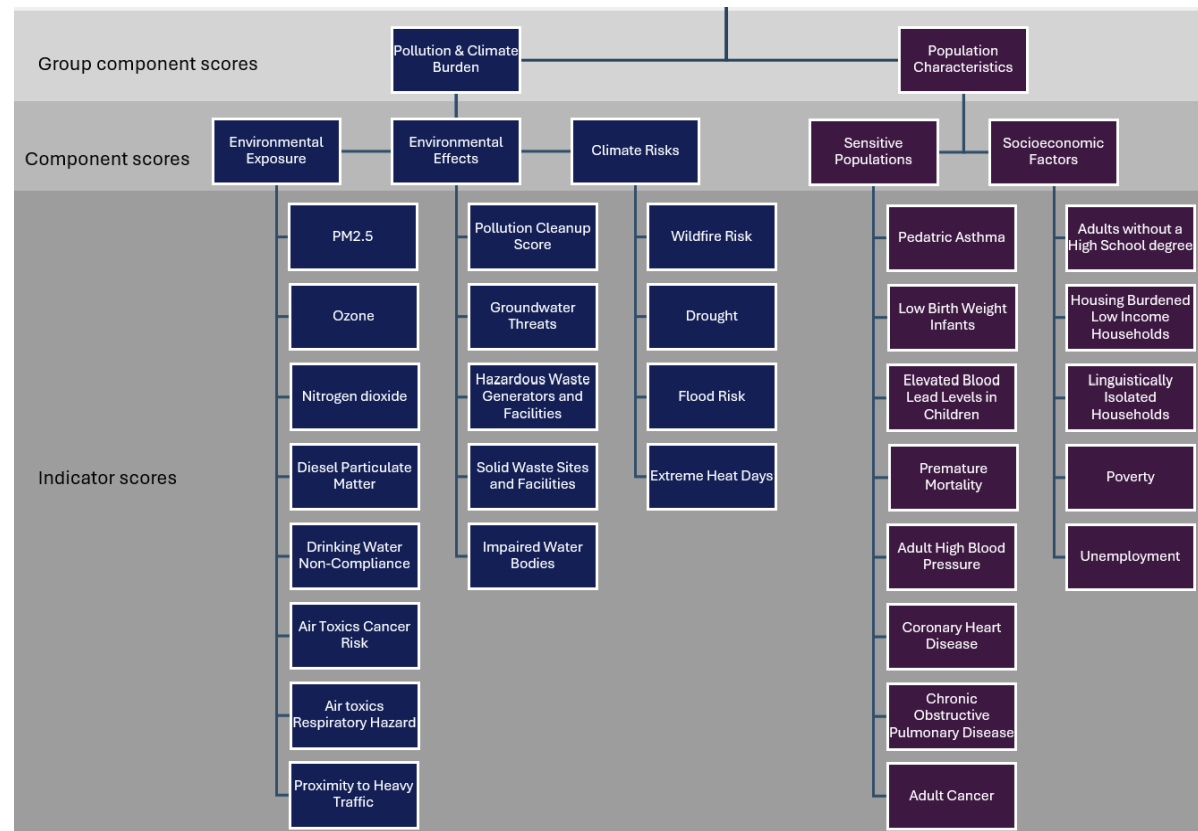
- MES percentile score of 75 or greater (BA Percentile Score: 85.6)
- Median Household Income 65% or less of the state median Household Income
BA Median Household Income:
(\$85,170 or 84% of statewide median household income)





Step 3: Record Indicator Values and Identify Elevated Indicators

- MES provides the percentile values for each Indicator in a Census Block Group.
- The Indicator values for the BA are the baseline conditions that will be used when assessing the Project's Impact.
- For each BA within the SGA, the Project Applicant must document the Elevated Indicators (i.e., those that exceed the 50th percentile for the specific Indicator).



The CIA process relies on MES Indicators. EFSB evaluates additional environmental and population information during its regular review of proposed Projects.



Step 3 : Identify Elevated Indicators in Burdened Areas Overlapping the SGA

- MES provides the percentile values (0-100) for every Indicator in every Census Block Group in the state.
- For each BA that overlaps the SGA, the Project Applicant must identify the Elevated Indicators for that BA (i.e., those that equal or exceed the 50th percentile statewide for the specific Indicator).
- For Fossil Fuel-Related Energy Infrastructure (i.e., Facilities that are not CEIF); all Indicators in MES are treated as Elevated Indicators in evaluating a BA that overlaps the SGA.



Step 4: Identify Project Impacts on Elevated Indicators

- For each Elevated Indicator, the Applicant provides a written description of the Project's Impact related to that Elevated Indicator in the BA for both the construction and the operations phases.
 - To the extent feasible, the Applicant shall endeavor to provide both a qualitative and a quantitative assessment of each such Project Impact
 - A Project may have negative, positive, or no Impacts on a given Indicator
 - Applicant must provide an explanation of how the Applicant assessed the projected level of such Impacts
- In assessing severity of a Project Impact, the Applicant should consider:
 - Nature of Impact
 - Magnitude/degree of Impact
 - Geographic extent of Impact
 - Impact duration



Step 4 (Continued): Identify Project Impacts on Elevated Indicators

- The Applicant assesses whether the Project results in a Disproportionate Adverse Effect related to an Elevated Indicator. A Disproportionate Adverse Effect arises when the Project causes a negative Impact that is likely to ***materially exacerbate*** the condition reflected by the Elevated Indicator.
- Appendix B of the CIA Report Template identifies some considerations for determining whether Project Impacts are likely to materially exacerbate conditions related to Elevated Indicators.



Some Considerations when Determining Whether an Indicator's Condition is Materially Exacerbated

- Measurability: Impacts to an Indicator are likely to be measurable
- Duration and frequency of Impacts
- Increased geographic extent of Impacts
- Resiliency and recovery rate
- Public health conditions: Would the Project impact the public health condition of a BA as measured by Elevated Indicators?



Step 4 Example: Assess Project Impacts* Relative to Elevated Indicators (for a proposed underground transmission line)

| Indicator | Anticipated Project Impact (either construction or operational phase) | Disproportionate Adverse Effect? Yes/No | Supporting Documentation |
|---|--|--|--------------------------|
| PM 2.5 | Temporary, localized emissions in immediate construction zone during construction activities only; no impacts during operations | Yes (Construction) | [Provided by Applicant] |
| Drinking Water Non-Compliance | Reduced pollution sources due to site remediation (construction); no ops impacts | No | [Provided by Applicant] |
| Pollution Cleanup Sites | Reduced pollution sources due to site remediation (construction); no ops impacts | No | [Provided by Applicant] |
| Groundwater Threats | Reduced pollution sources due to site remediation (construction); no ops impacts | No | [Provided by Applicant] |
| Hazardous Waste Generators and Facilities | No impacts to the number of hazardous waste generators and facilities from Project | No | [Provided by Applicant] |
| Impaired Water Bodies | Erosion best practices eliminate impacts to water bodies during construction. Stormwater management eliminates operational impacts | No | [Provided by Applicant] |
| Drought | No Impacts to drought conditions | No | [Provided by Applicant] |
| Flood Risk | No Impacts to flood risk due to effective stormwater management | No | [Provided by Applicant] |

*** For Illustrative Purposes Only**



Step 5: Propose Remedial Actions for Disproportionate Adverse Effects

- If a Disproportionate Adverse Effect is determined, the Applicant must propose remedial actions to address the Project's Impact to that Elevated Indicator
- Proposed remedial actions should include a description of any actions the Applicant proposes for remediation of Disproportionate Adverse Effects, using the mitigation hierarchy:
 - Avoidance: Avoiding Impacts where possible
 - Minimization: Reducing unavoidable Impacts to the greatest extent feasible, and
 - Mitigation: Address remaining effects through appropriate mitigation measures, which may include rehabilitation, restoration, or offsets
- Remedial actions should proportionately address the nature, degree, and spatial/temporal extent of Disproportionate Adverse Effects resulting from a proposed Project



Step 5 Example: Illustrative Remedial Actions for Disproportionate Adverse Effects

| Elevated Indicator Materially Exacerbated by Sudbury Hudson Transmission Project | Proposed Impact Avoidance | Proposed Impact Minimization | Proposed Impact Mitigation | How do Remedial Measures Address Anticipated Project Impacts? |
|---|---|---|---|--|
| PM 2.5 (Construction Phase Only) | Electrification of construction vehicles and equipment to extent feasible, especially equipment used near schools, recreational facilities (parks, playgrounds), daycare centers, hospitals, etc. | Off-road construction in inactive rail corridor reduces traffic and emissions that would otherwise occur with in-road route alternative | Rail trail associated with Project will reduce motor vehicle use and associated emissions | Electrification of construction vehicles and equipment significantly reduces PM 2.5 emissions during construction. Rail trail provides air quality benefits during operation. Off-road construction reduces traffic and emissions. |



CIA Report Contents

- CIA Report Template developed to facilitate reporting
- Noticed Site or Route to be assessed
- Map(s) showing SGA(s) with any overlapping Burdened Area(s)*
- Project Impacts related to Elevated Indicators and whether project materially exacerbates existing conditions
- Disproportionate Adverse Effects
- Proposed Remedial Actions to address Disproportionate Adverse Effects

**If the SGA does not overlap with any BAs, the Applicant ends the CIA Report here. Depending on the Project type, Site Suitability Scoring may be required.*



Board Review of CIA and Site Suitability Reports

- The Board assesses whether the CIA Report meets regulatory criteria pursuant to 980 CMR 15.11 (per below)
- Board's findings:
 - Shall assess the adequacy of the CIA and Site Suitability Reports, including whether the Applicant, if required to, presented a comprehensive analysis of whether its Project Impacts will result in a Disproportionate Adverse Effect, and make findings based on that review.
 - Consider whether the Applicant has given due consideration to the Cumulative Impact of the Project-and whether the Applicant has adequately undertaken actions to avoid, minimize, or mitigate any Disproportionate Adverse Effects from the Project.
 - Consider whether an Applicant has made reasonable efforts to consider and develop a Community Benefit Plan or Community Benefits Agreement and, if not, consider imposing additional Project conditions to address Disproportionate Adverse Effects in BA intersecting the Project's SGA.



Responses to Comments Received

- Received approximately 20 distinct sets of comments (plus 185 form comments) – during the development of the draft Proposed Regulations (more opportunity for comment)
- **Major revisions** based on comments:
 - **Different Treatment for Legacy (fossil-fuel related energy infrastructure) and Clean Energy Facilities:** The proposed CIA and SSC regulations now distinguish between legacy and clean facilities. To assess a Disproportionate Adverse Effect in a BA that intersects an SGA, CEIF must assess only Elevated Indicators, but Legacy Facilities must assess all Indicators.
 - **Petition for Use of CIA in Non-Burdened Areas:** In the proposed CIA regulations, Key Stakeholders may petition the Applicant and the Board to require an Applicant to apply Cumulative Impact Analysis to a Census Block Group that is not itself a Burdened Area and that intersects an SGA.
 - **Expanded Role for Site Suitability:** The proposed CIA and SSC regulations requires Site Suitability assessment of additional projects, subject to the exemptions discussed in earlier slides.
 - **Periodic Reg Updating Review:** Regs require a review of the EFSB CIA and SSC regulations in no later than five years.



Responses to Comments Received (Cont'd)

■ Major Provisions Retained (some comments advocate otherwise)

- **Percentile-based comparative approach in MES vs. health/environmental standards:** Retain percentile-based comparative approach in the CIA and SSC regulations. Established regulatory thresholds are relevant to the Board's consideration of the adequacy of remedial actions to avoid, minimize, and mitigate disproportionate adverse effects.
- **75th percentile for definition of Burdened Area, and 50th percentile for definition of Elevated Indicators:** Will retain this distinction.
- **Disproportionate Adverse Effect Standard:** Retaining the standard of "materially exacerbate" instead of a zero impacts standard advocated by some commenters. EFSB interpretation of "disproportionate" is "out of proportion to what is reasonable under the circumstances." "Materially exacerbate" allows the Board to determine the specific Impacts of a Project and the specific conditions in a BA. Standard consistent with standard used by MEPA in EJ Protocol.
- **Existing Clean Energy Projects:** Mostly Rural communities with "too much solar" want to be designated as Burdened Areas. However, this is more a land use issue not appropriate for CIA.
- **Adding Indicators for Board Consideration:** Proposed regs do not include a mechanism for adding additional Indicators outside of the five year review cycle. However, numerous opportunities for public comment exist, both before and after the filing of the petition. Communities near a project may informally alert the Board to Burdens that are not otherwise captured by the proposed CIA process. 980 CMR 15.01(3). The regulations strike a balance between simplicity and completeness.

■ Other actions based on comments

- MES Data Concerns (aging data, data sources, double counting potential, treatment of missing data, etc.): Staff will convene a forum to further consider opportunities to improve the MES.



Questions & Comments

Energy Facilities Siting
Board (EFSB)



Board Meeting – December 15, 2025

Proposed Regulations

The meeting will begin/resume shortly

Technical Issues? Call or text 857-200-0065