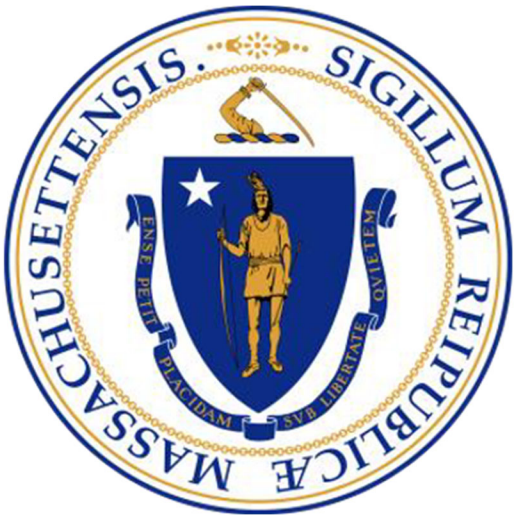

Department of Public Utilities

Siting Division

Energy Facilities Siting Board

MANAGEMENT STUDY REPORT

July 2025

Prepared by GreenerU

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A. EXECUTIVE SUMMARY

The 2024 Climate Act, which Governor Maura Healey signed into law on November 20, 2024, includes provisions to expedite and consolidate the siting and permitting of clean energy infrastructure, which includes generation, storage, transmission and distribution. Most siting and permitting provisions of this law go into effect March 1, 2026.

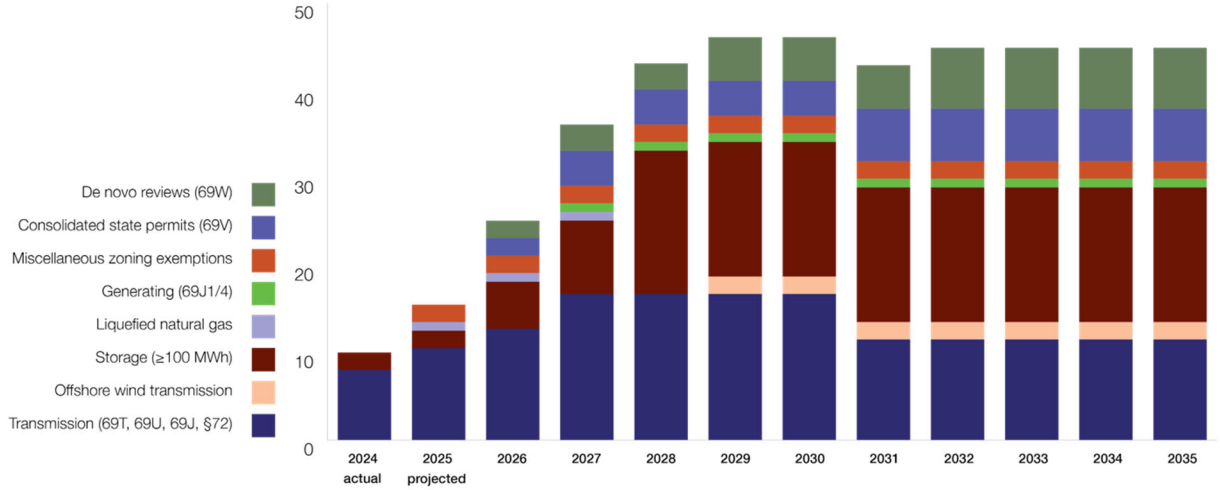
“Large clean energy infrastructure facilities" will be subject to the jurisdiction of the Energy Facilities Siting Board (EFSB), an independent agency that conducts adjudicatory review of large energy infrastructure and is supported by the Siting Division of the Massachusetts Department of Public Utilities (DPU). The EFSB will issue consolidated permits for large clean energy infrastructure facilities that include all state, regional and local permits needed for construction and operation of the facility. Depending on the type of small clean energy infrastructure facility (CEIF), and the regulatory process used, the EFSB may also issue just the necessary state permits (a "Consolidated State Permit"), or all state, regional and local permits (a "Consolidated Permit").[1,2]

Following a 30-day application completeness determination, the EFSB will have mandatory timelines of 12 months to issue a decision for a small CEIF, and 15 months for a large CEIF. If the EFSB does not issue a final decision within the prescribed time period, the application will be deemed constructively approved, and subject to a set of standard conditions. Issuing timely decisions, and avoiding constructive approval, will require that the EFSB have both an efficient process, and adequate staffing and resources. These needs underlie the purpose and objectives of this study, as required by the 2024 Climate Act.

The expected increase in the number of applications for CEIFs filed with the EFSB, as well as the increased scope of review in these cases, is expected to require new efficiencies in how the EFSB operates, and an increased level of staffing and other resources compared to current levels. This report examines these needs, estimates the number of case filings by project type in the coming decade, and makes staffing and process recommendations to help achieve timely decisions that fulfill statutory requirements (see Figure 1).

[1] A Consolidated Permit pertains to CEIF applications filed with the Siting Board under M.G.L. c. 164 §§ 69T and 69U; a Consolidated State Permit would pertain to § 69V applications. When referring to them jointly “EFSB Consolidated Permit.”
[2] In parallel with the EFSB, the Department of Energy Resources is charged with establishing regulations for standard conditions, criteria, and requirements for the siting and permitting of small CEIF by local governments in the form of a "Consolidated Local Permit."

Figure 1. — DPU Siting Division project filings by type: 2024–2035



From 2014-2023, the EFSB received an average of 4.1 applications per year. By 2027, this volume is expected to increase nearly ten-fold; however, the increase in permit applications may not directly correlate with a comparable increase in workload. Of importance, permitting processes will be expedited and current practices more streamlined with new regulations, guidelines, and standard application requirements. Recommendations for these changes will be developed by the DPU Siting Division and other agencies throughout 2025 and will take effect by March 1, 2026.[3] Regardless, this significant increase in volume will require additional staffing and financial resources.

This report outlines detailed recommendations to the DPU Siting Division staff to:

1. Restructure management work responsibilities
2. Redistribute responsibilities among and empower staff
3. Streamline and expedite review processes
4. Increase staff understanding of decisions and issue-spotting
5. Elevate staff's writing output
6. Professionalize meeting management
7. Improve efforts to recruit and hire diverse, qualified candidates
8. Organize and improve employee training materials

Further, this report includes recommendations for increased staffing (from 14 to 26 employees), as well as necessary budgets (from about $2 million annually to $3.5 - 4 million annually) to support the expansion of staffing levels and additional responsibilities required by law.

[3] The 2024 Climate Act requires that the agencies promulgate regulations by March 1, 2026 for relevant projects filed on and after July 1, 2026.

B. INTRODUCTION AND CONTEXT

The Commonwealth of Massachusetts has committed to achieving net zero greenhouse gas emissions with a minimum 85% reduction in greenhouse gas emissions as compared to 1990 levels in 2050. This goal, sometimes referred to as the clean energy transition, is dependent upon a number of events occurring in concert: energy efficiency solutions, decarbonization and electrification, a clean and renewable energy supply, resilient grid infrastructure, increased grid capacity, and the ability of clean energy generation to interconnect.

Electricity demand is projected to increase substantially throughout the next decade in Massachusetts. According to ISO New England, an annual increase of 1.2% is expected throughout New England, largely driven by projected increases in electric vehicle sales and heating electrification.[4] Demand on the electricity grid will be somewhat alleviated by increased energy efficiency, distributed generation (e.g., on-site solar), advanced metering infrastructure, time-varying rates, and other demand management mechanisms. Electricity generation, however, will need to increase substantially to meet rising demand.

In Massachusetts, siting and permitting energy infrastructure – which includes energy generation, storage, transmission, and distribution – has historically been a fragmented, unpredictable, often lengthy, and seemingly duplicative process. According to a report by the Commission on Energy Infrastructure Siting and Permitting (Commission), "clean energy infrastructure projects can be slowed by a number of barriers, including numerous lengthy and sometimes redundant permitting and appeals processes. At the same time, residents feel stakeholder engagement can often be lacking and ineffective, particularly for marginalized communities that have historically borne the brunt of hosting energy infrastructure. Current siting and permitting processes also are not often integrated with the Commonwealth's emissions reduction requirements or climate and land use goals."[5]

On September 26, 2023, Massachusetts Governor Maura Healey established the Commission via Executive Order 620 to "remove barriers to expeditious and responsible clean energy infrastructure development and meet greenhouse gas emissions limits outlined in the Clean Energy and Climate Plans (CECPs)."[6] The Commission included 28 individuals representing varying perspectives, including utility companies, clean energy developers, local and state government agencies, environmental advocates, and representatives of environmental justice populations. More information on the Commission's process is available in its March 2024 report.

[4] ISO New England, Key Grid and Market Stats, "New England's electricity use." From https://www.iso-ne.com/about/key-stats/electricity-use, accessed July 8, 2025.
[5] Commonwealth of Massachusetts. Executive Office of Energy and Environmental Affairs. Commission on Energy Infrastructure Siting and Permitting. "Recommendations to Governor Maura Healey on Clean Energy Infrastructure Siting and Permitting." March 29, 2024: 4. From https://www.mass.gov/doc/recommendations-to-governor-maura-healey-on-clean-energy-infrastructure-siting-and-permitting-reform/download, accessed November 2, 2024.
[6] *Ibid.*, page 5.

1. The 2024 Climate Act

Following work of the Commission, and extensive work in the legislature on various proposals to implement its recommendations, Governor Maura Healey signed the Act into law on November 20, 2024. The EFSB-related provisions can be summarized as follows.

Clean energy infrastructure definitions and jurisdictions. The Act created a new category of infrastructure, "clean energy infrastructure" facilities. Under the Act, “large clean energy infrastructure” and “small clean energy infrastructure” is defined under categories of generation, storage, and transmission and distribution infrastructure. These definitions and thresholds are outlined in Table B1.

Consolidated permitting process. The Act sets up a consolidated permitting process for large clean energy infrastructure facilities, under which an EFSB approval would include all local, regional, and state permits that would otherwise be required to construct and operate a facility.

New standards and guidelines. The EFSB must establish rules and regulations for the consolidated permit process by March 1, 2026, including for cumulative impact analyses and application of site suitability criteria. The EFSB is tasked with establishing:

- Pre-filing outreach requirements, including consultations with permitting agencies and the Massachusetts Environmental Policy Act (MEPA) Office
- Common standard applications
- Common baseline standards for approvals, which could vary for project types
- Standards for applying EEA’s site suitability criteria
- Standards for applying cumulative impacts analysis guidelines developed by the EEA Office of Environmental Justice and Equity
- Standard permit conditions
- Criteria for the entities responsible for compliance with permit conditions

Pre-filing consultations. Clean energy infrastructure projects under EFSB jurisdiction are exempt from MEPA requirements but developers are required to consult with MEPA and other permitting agencies prior to filing an application with the EFSB.

Cumulative impact analysis. Project applicants will be required to submit a “cumulative impact analysis” as part of their application, which is “a written report produced by the applicant assessing impacts and burdens, including but not limited to any existing environmental burden and public health consequences impacting a specific geographical area in which a facility, large clean energy infrastructure facility or small clean energy infrastructure facility is proposed from any prior or current private, industrial, commercial, state or municipal operation or project; provided, that if the analysis indicates that such a geographical area is subject to an

existing unfair or inequitable environmental burden or related health consequence, the analysis shall identify any: (i) environmental and public health impact from the proposed project that would likely result in a disproportionate adverse effect on such geographical area; (ii) potential impact or consequence from the proposed project that would increase or reduce the effects of climate change on such geographical area; and (iii) proposed potential remedial actions to address any disproportionate adverse impacts to the environment, public health and climate resilience of such geographical area that may be attributable to the proposed project."[7]

EFSB makeup. The Act revises the membership of the EFSB, expanding it to include additional agency heads and an additional public member. The Act specifies that one public member must be a representative of the Massachusetts Association of Regional Planning Agencies; one must be a representative of the Massachusetts Municipal Association; one must have environmental justice or tribal experience; and one must have labor experience.

New EFSB mandate. Currently, the EFSB is charged with "ensuring that the state has a reliable energy supply at a low cost and with minimal environmental impact."[8] Under the new legislation, the EFSB must "(i) provide a reliable, resilient and clean supply of energy consistent with the commonwealth's climate change and greenhouse gas reduction policies and requirements; (ii) ensure that large clean energy infrastructure facilities, small clean energy infrastructure facilities, facilities and oil facilities avoid or minimize or, if impacts cannot be avoided or minimized, mitigate environmental impacts and negative health impacts to the extent practicable; (iii) ensure that large clean energy infrastructure facilities, small clean energy infrastructure facilities, facilities and oil facilities are, to the extent practicable, in compliance with energy, environmental, land use, labor, economic justice, environmental justice and equity and public health and safety policies of the commonwealth, its subdivisions and its municipalities; and (iv) ensure large clean energy infrastructure facilities, small clean energy infrastructure facilities, facilities and oil facilities are constructed in a manner that avoids or minimizes costs."[9]

New permitting process. Applicants must comply with all pre-filing requirements prior to filing an application with the EFSB. Once submitted, the DPU Siting Division has a 30-day period to review and determine completeness before commencing an adjudicatory review.[10] There must be at least one public comment hearing.[11] All entities that would otherwise require a permit or approval may appear as a party in the proceeding and may submit statements of recommended permit conditions.[12] The EFSB must complete its review and issue a decision

[7] "An Act promoting a clean energy grid, advancing equity and protecting ratepayers," St. 2024, c. 239. From https://malegislature.gov/Laws/SessionLaws/Acts/2024/Chapter239, accessed July 8, 2025.
[8] 194th General Court of the Commonwealth of Massachusetts, General Laws, Part I, Title XXII, Chapter 164, Section 69H. From https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXXII/Chapter164/Section69H, accessed January 8, 2025.
[9] St. 2024, c. 239 § 60.
[10] St. 2024, c. 239 § 74.
[11] *Ibid.*
[12] *Ibid.*

("approve, approve with conditions, reject") within 15 months of completeness of an application for large clean energy infrastructure facilities.[13] If no decision is issued within 15 months, the project receives a constructive approval permit to construct with the common conditions and requirements the EFSB has set for the relevant type of facility.[14]

De novo adjudication of small clean energy infrastructure. Within 30 days of the single, final decision on a consolidated permit application by a local government, project proponents and other individuals or entities substantially and specifically affected by a proposed small clean energy infrastructure facility may file a petition to request a de novo adjudication of the permit application by the director of the DPU Siting Division, pursuant to G.L. c. 164 § 69W. Another type of de novo review by EFSB can occur if local government feels that it lacks the resources, capacity or staffing to review a small clean energy infrastructure facility permit application. In such circumstances, local government may request the EFSB to conduct the local review within the prescribed time period.[15] Both types of de novo review would involve a decision by the DPU Siting Division director that follows the statewide permitting standards for small CEIF facilities, as established by the DOER.[16]

[13] *Ibid.*
[14] *Ibid.*
[15] St. 2024, c. 239, § 23.
[16] St. 2024, c. 239, § 74

Table 1. — Generation, energy storage, transmission and distribution types, and thresholds under EFSB jurisdiction in the 2024 Climate Act[17,18]

c.164 Sec.	Type	Threshold
	Large clean energy generation	
§69T	Solar facility	≥25 MW
§69T	Wind facility, onshore	≥25 MW
§69T	Anaerobic digestion	≥25 MW
	Large clean energy storage systems[19]	
§69T	Large clean energy storage facility, including any ancillary structure that is an integral part of the operation of the large clean energy storage facility[20]	≥100 MWh
	Large clean transmission and distribution	
§69T	New electric transmission lines in a new right of way, including ancillary structure that is an integral part of the operation of the transmission line[21]	≥69 kV, >1 mile
§69T	New electric transmission lines in an existing right of way, except reconductored or rebuilt transmission lines at the same voltage, including any ancillary structure that is an integral part of the operation of the transmission line[22]	≥115 kV, ≥10 miles
§69T	New electric transmission infrastructure requiring zoning exemptions, including standalone transmission substations and upgrades and any ancillary structure that is an integral part of the operation of the transmission line[23]	All
§69T	Facilities needed to interconnect offshore wind to the grid, with additional provisions[24]	All
	Small clean energy infrastructure	
§69U	Small clean energy transmission and distribution infrastructure facility[25]	All
§69V	Small clean energy generation or storage facility (consolidated state permits)	All
§69W	Small clean energy infrastructure facility	All

[17] St. 2024, c. 239, § 57.
[18] Non-EFSB jurisdictional projects may still be required to obtain other state permits (e.g., anaerobic digestion ≤ 25 MW may need to obtain a MassDEP air permit). Additionally, any utility-owned clean transmission or distribution project that is non-EFSB jurisdictional and requests a consolidated permit issued by EFSB must first demonstrate good cause to apply to the EFSB, per Section 74 of the 2024 Climate Act.
[19] Pumped hydroelectric facilities located on navigable waterways are reviewed by the Federal Energy Regulatory Commission (FERC).
[20] St. 2024, c. 239, § 57.
[21] *Ibid.*
[22] *Ibid.*
[23] *Ibid.*
[24] St. 2024, c. 239, § 57. The large clean transmission and distribution facility "(a) [must be] designed, fully or in part, to directly interconnect or otherwise facilitate the interconnection of clean energy infrastructure to the electric grid; (b) [must be] designed to ensure electric grid reliability and stability; or (c) [must be] designed to help facilitate the electrification of the building and transportation sectors; and provided further, that a "small clean transmission and distribution infrastructure facility" shall not include new transmission and distribution infrastructure facilities that solely interconnect new or existing generation powered by fossil fuels to the electric grid on or after January 1, 2026.
[25] St. 2024, c. 239, § 74.

With the 2024 Climate Act, as well as the drive to meet clean energy and storage targets set out in the Massachusetts Clean Energy and Climate Plan (CECP) for 2050, the Siting Division is facing an increase in workload, staffing, and resource needs while managing its current workload.[26] Some of these legislative provisions will require promulgation of new or revised regulations; others may be best addressed through guidance documents, and some a combination of both. Based on the Act, the DPU Siting Division must address the following:

- Continued work on cases filed under the DPU Siting Division's current jurisdictional authority[27]
- A regulatory and rulemaking process to transition to "EFSB 2.0" that includes:
    - Determining filing fees for different types of applicants
    - Establishing a new standard application process for a consolidated permit
    - Developing standard conditions for regulations and guidance
    - Developing procedural regulations, including definitions, intervention, notice distances, procedural schedules and timelines, requirements for prefiling engagement, guidance for reviewing compliance filings post decisions, project changes, and EFSB composition
    - Developing a prefiling consultation and community engagement process
    - Developing a process for constructive approvals
    - Developing requirements for cumulative impacts analyses (including for facilities that do not meet "clean energy" definitions)
    - Developing a process to apply site suitability criteria
    - Developing interim processes for energy storage systems
    - Developing protocols for interfacing with local permitting processes
    - Developing protocols for interfacing with other state permitting processes
    - Establishing an intervenor support grant program (with the DPU)
    - Establishing a new permitting dashboard
    - Developing a process for de novo adjudications

The Act requires the Siting Division to perform a management study to assess: (i) the likely workload of the EFSB based on the new requirements of this Act and the Commonwealth's clean energy and climate plans; (ii) the workforce qualifications needed to implement this Act; (iii) the cost associated with the hiring and retention of qualified professionals and consultants to successfully complete that work required pursuant to this Act; and (iv) the design, population, and maintenance of a real-time, online clean energy infrastructure dashboard, as required to be maintained by the Siting Division pursuant to section 12N of chapter 25 of the General Laws, to be reported to the Joint Committee on Ways and

[26] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, "Clean Energy and Climate Plan for 2050," December 2022. From https://www.mass.gov/doc/2050-clean-energy-and-climate-plan/download, accessed November 19, 2024.
[27] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Public Utilities, Energy Facilities Siting Board, "EFSB and DPU Siting Open Dockets." From https://www.mass.gov/info-details/efsb-and-dpu-siting-open-dockets, accessed July 8, 2025.

Means, the Joint Committee on Telecommunications, Utilities and Energy; the Secretary of Energy and Environmental Affairs, and the Secretary of Administration and Finance not later than August 1, 2025.[28]

To prepare for these changes, the Siting Division hired a consulting firm, GreenerU, in July 2024, to develop a management study to answer the following:

- What is the anticipated number and type of applications filed with the EFSB in the next 10 years with a breakdown into anticipated filings every two years, for applications seeking EFSB approvals given industry trends and revised jurisdictional responsibilities of the EFSB?
- With revisions to the EFSB process specified in pending legislation, how would workloads and other resource requirements for Siting review on cases differ from current requirements? What is the magnitude of these changes?
- Given the anticipated legislative changes and workloads, what types of personnel skill sets and qualifications and organizational structure would position the Siting Division for success, including a change to the Siting Division management structure?
- What administrative, management, and workflow procedures can improve efficiencies?
- How can the Siting Division expedite and/or improve on the efficiency of training new staff to support the permitting process?
- What technologies could support efficiency and training efforts?
- How many employees (and consultants, if appropriate) should the Siting Division employ, and what position titles would best meet the needs?
- What additional budget is required to support the recommended level of staffing and retain existing staff?
- What funding is required to support other aspects of the revised EFSB process, including intervenor funding, pre-filing engagement, and other new features?
- What will a detailed transition plan look like to implement all necessary changes, including:
    - Recruiting and training procedures for new staff
    - Promulgation of required regulations and guidance documents
    - Budget and finance tools to ensure that resource needs are identified in advance and provided
    - Inter-agency coordination and consultation
    - Hardware and software needs to support the Siting Division
    - Public outreach and education about revisions to the siting process

Timeline:

- **March 29, 2024** — Commission on Energy Infrastructure Siting and Permitting, a body authorized by Governor Maura Healey through Executive Order 620, delivers a set of recommendations to the Legislature

[28] St. 2024, c. 239, § 120.

- **June 25, 2024** — Senate passes S.2829, "An Act upgrading the grid and protecting ratepayers"

- **July 17, 2024** — House passes H.4884, "An Act accelerating a responsible, innovative and equitable clean energy transition"

- **October 17, 2024** — House and Senate announce agreement on "comprehensive climate and clean energy siting and permitting legislation"

- **October 25, 2024** — Senate passes S.2967, "An Act promoting a clean energy grid, advancing equity and protecting ratepayers"

- **November 14, 2024** — House passes S.2967, "An Act promoting a clean energy grid, advancing equity and protecting ratepayers"

- **November 20, 2024** — Governor Maura Healey signs "An Act promoting a clean energy grid, advancing equity and protecting ratepayers" (the 2024 Climate Act) into law, with siting and permitting reform changes to take effect March 1, 2026, for projects filed on or after July 1, 2026.

- **February 18, 2025** — 2024 Climate Act goes into effect

- **March 1, 2026** — EFSB (and DPU and DOER) to promulgate regulations to implement the 2024 Climate Act

C. RESEARCH AND ASSESSMENT METHODOLOGIES

GreenerU worked closely with the DPU Siting Division staff, particularly its current three-person management team, to develop a solid baseline of Siting Division activities, areas of expertise, important informal roles and responsibilities within the division, and current jurisdictional activities.

From June to December 2024, GreenerU facilitated weekly core team check-in meetings with the DPU Siting Division management team staff (Director, Assistant Director, General Counsel) to share information and progress, discuss findings, and provide project updates.

In August 2024, GreenerU distributed and anonymized the results of an employee engagement survey of all DPU Siting Division staff with the intention of developing a baseline of internal culture. This survey, recommended to be issued annually, will offer continued insights on the Siting Division's workplace culture as the workforce grows.

GreenerU conducted confidential interviews throughout July and August 2024 with a diverse set of current Siting Division staff members to estimate time spent on current core Siting Division project reviews and gain staff insights on inefficiencies and opportunities for improvement, additional training or skill sets that may be beneficial for future work, and staff recruiting and retention practices. GreenerU also conducted interviews with siting practitioners from Pierce Atwood, Foley Hoag, New Leaf Energy, and Potomac Law to gain insights on how pending siting and permitting legislation might accelerate the number of clean energy generation and storage projects forecasted for EFSB review.

GreenerU facilitated a DPU Siting Division management team half-day retreat on August 26, 2024, to perform a comprehensive evaluation of overall Siting Division challenges; discuss and develop potential efficiencies to the proposal review process; develop a firmer grasp of the workload associated with the process of developing rules and regulations following the passage of the 2024 climate legislation; and developing solutions to free up management's time to focus on the aforementioned transition.

Supplementing existing efforts by DPU staff, GreenerU performed a high-level review of peer states' siting and permitting processes, particularly in terms of pre-filing requirements. Because other states' jurisdictions, procedures, clean energy targets, and legislation vary widely, insights from this process are limited.

In September 2024, DPU Siting Division team members and GreenerU met separately with staff from National Grid and Eversource to understand forecasted transmission and distribution projects through 2030, as well as general insights and market predictions. A request for similar data from representatives of Municipal Light Plant operators via the Municipal Electric Association of Massachusetts (MEAM) did not yield any additional results.

On October 17, 2024, GreenerU facilitated a Siting Division all-staff half-day retreat to create, facilitate, and demonstrate a culture of feedback and open dialogue within the entire DPU Siting Division team;

provide training on effective meeting management; review and discuss employee engagement survey results and suggestions; and strengthen and empower the DPU Siting Division team to prepare for the transition to its new jurisdictional authority.

Finally, from October through December 2024, GreenerU conducted additional research on the history of clean energy infrastructure growth and development in Massachusetts to date. These and other findings were compiled into this report, which was vetted by DPU Siting Division staff and interagency representatives before final publication.

D. CURRENT STATE OF THE DPU SITING DIVISION

1. The DPU Siting Division and EFSB jurisdiction

Currently, the Siting Board's responsibilities include reviewing and issuing between five and ten decisions annually for:[29]

- Electric generating facilities with a generating capacity of ≥100 MW
- New electric transmission lines of ≥69 kV design rating and ≥1 mile in a new transmission corridor, including ancillary structures
- New electric transmission lines of ≥115 kV and ≥10 miles in an existing transmission corridor including ancillary structures, except reconductoring or rebuilding,
- Gas manufacture or storage facilities with a storage capacity of ≥25,000 gallons
- Intrastate gas pipelines with a normal operating pressure >100 pounds per square inch gauge and >1 mile in length, except rebuilding
- Zoning exemptions to "public service corporations" for the construction and operation of energy facilities
- Proposed energy facilities involving both the DPU and ESFB jurisdiction, including:
    - Approving construction and operation of sub-jurisdictional electric transmission lines;
    - Granting eminent domain and survey authority for electric transmission and natural gas pipelines; and
    - Granting locations (in roadways) for electric transmission lines (G.L. c. 166, § 28).

The Siting Board also intervenes in gas pipeline interstate matters at the Federal Energy Regulatory Commission (FERC).

2. Budget and funding

Each fall, the Siting Division makes a budget request to the DPU to fund existing and requested positions, and other major operational expenses, such as consultants, new software, training and conferences, equipment needed, interpretation/translation services, and other such expenses. The fiscal year 2024 budget was $2,013,113. An approximate budget breakdown is provided in Table 2. Siting Division budgets are funded through a combination of the annual DPU utility assessment and applicant filing fees ranging from $25,000 to $125,000, depending on project type, as specified by G.L. c. 164 § 69J½, which was last updated in 1989.[30]

Table 2. — DPU Siting Division fiscal year 2025 budget

[29] While the EFSB has jurisdiction over new oil facilities of more than 500,000 barrels of storage capacity and oil pipelines more than 1 mile in length, there has never been a case or approval of either project type.
[30] The 193rd Court of the Commonwealth of Massachusetts, General Laws, Part I, Title XXII, Chapter 164, Section 69J$^{1}/_{2}$, "Fees for applications to construct electricity facilities."

Category	Amount
Payroll	$1,566,146
Payroll tax	$25,372
Travel	$10,680
Administrative expenses	$27,624
Translation services	$73,120
Overhead (rent, utilities, etc.)	$196,359
IT expenses	$96,015
Total	**$1,995,315**

3. Recruiting, hiring, and onboarding

The Siting Division is a division within the DPU with dual jurisdictional responsibilities to the DPU Commission for certain cases, and to the independent EFSB for other cases. Administrative functions for the Division, such as human resources, payroll, legal, and finance are overseen by DPU management and the DPU Commission. Non-management Siting Division positions are union-classified through the National Association of Government Employees (NAGE) and the Massachusetts Organization of State Engineers and Scientists (MOSES).

The process of drafting requisitions, recruiting and hiring for open positions at the DPU Siting Division is performed by Siting Division managers in consultation with the DPU, the Commonwealth's Human Resources Division and Human Resources personnel at the Executive Office of Energy and Environmental Affairs (EEA). These HR-related programs and services include:

- Recruiting new employees
- Providing mandatory and optional training courses for new and existing employees
- Administering HR policy, employee benefits, and payroll functions
- Offering employee self-service HR related support
- Administration of collective bargaining agreements and contracts
- Ensuring an inclusive, safe and productive workplace[31]

The Human Resources Division and EEA HR administer new position classifications and post job openings at the MassCareers Job Opportunities website. Hiring managers at the Siting Division work in concert with HR personnel and DPU Fiscal Director to initiate and administer recruitment procedures to fill approved positions. Positions typically take between two and four months to fill from beginning to end of the recruitment process.

[31] See more at https://www.mass.gov/orgs/human-resources.

Training and onboarding for new DPU Siting Division staff can vary by manager. Hiring managers typically meet with new hires on a daily basis during initial weeks and provide materials for review and training during the initial weeks of employment and orientation to the Siting Division. New hires are provided with a variety of training and reference materials pertinent to their positions.

4. Current staffing

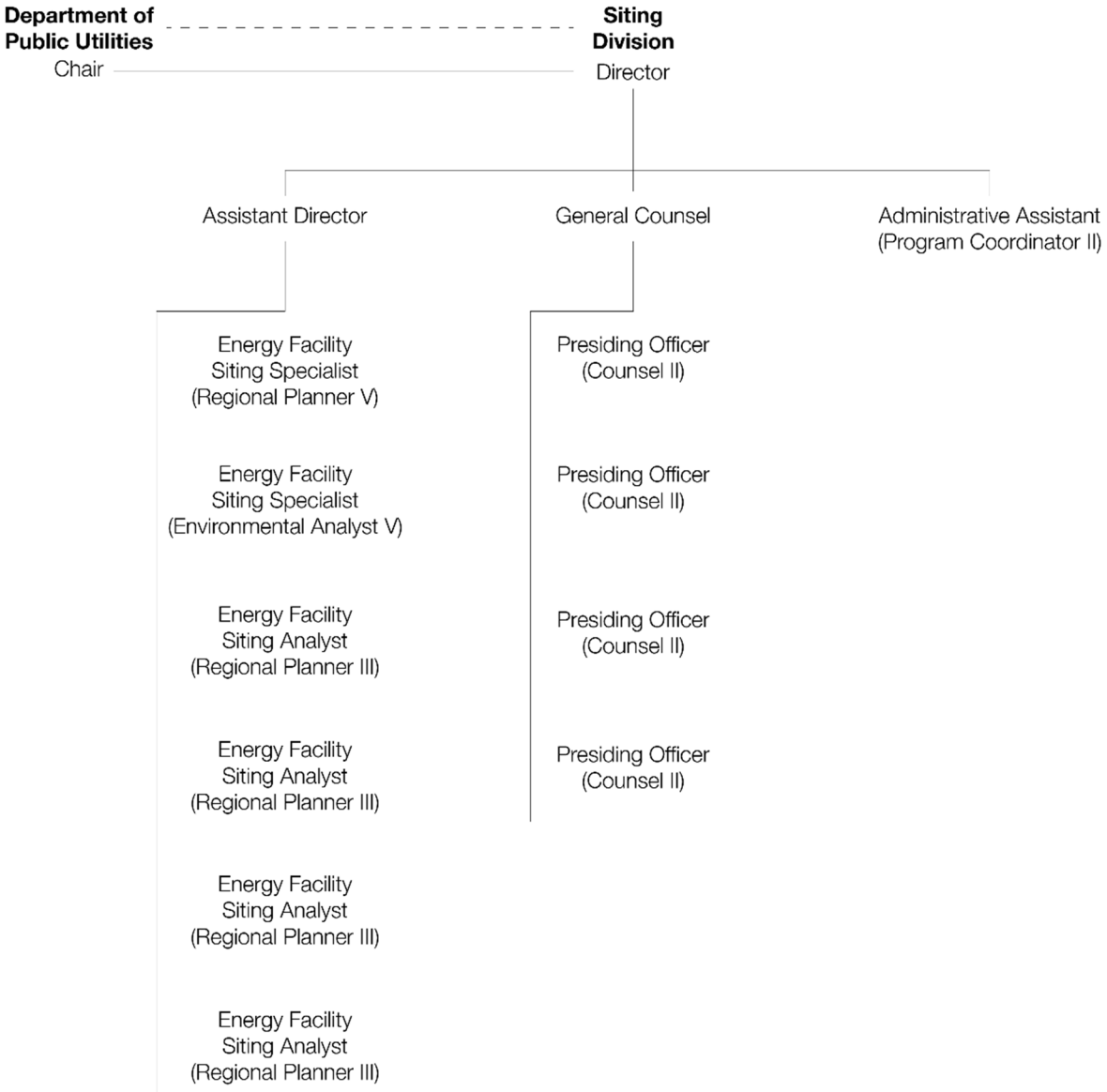
The current staff of the DPU Siting Division is a division of the DPU and, when fully staffed, consists of 14 full-time employees, as shown in Table 3.

Table 3. — Current Siting Division positions

Title	Count
Director	1
General Counsel	1
Assistant Director	1
Energy Facility Siting Specialist (Regional Planner V/Environmental Analyst V)	2
Energy Facility Siting Analyst (Regional Planner III)	4
Presiding Officer (Counsel II)	4
Administrative Assistant (Program Coordinator II)	1
Total	**14**

Backgrounds and skill sets include management; environmental and civil engineering; environmental science, environmental health; urban planning; architecture/landscape architecture; land use planning; administrative and energy law; finance and economics; business; marine biology; and communications. The current Siting Division's organizational chart is illustrated in Figure 2.

Figure 2. — DPU Siting Division organizational chart: 2025



Throughout 2024 and until June 2025, the Siting Division had an average of 12.3 full-time staff members.

5. The current review process

DPU Siting Division review process for the majority of case filings falls into four phases.

1. **Pre-filing phase**. While there are no regulations at present that govern pre-filing activities by applicants, it is common for prospective applicants to request a pre-filing meeting to brief Siting Division staff on upcoming filings and clarify any necessary procedural or administrative

requirements that may apply to such filings.

2. **Procedural phase**. Following a pre-filing exchange with proponents regarding logistics, an applicant files a petition with the EFSB or DPU starting the formal adjudicatory review. The "start of proceeding" involves a series of steps for Siting Division staff to provide the public an opportunity to comment and for staff to become familiar with the application.

3. **Evidentiary phase**. Staff and intervenors—petitioners who have demonstrated that they may be "substantially and specifically affected" by a proposed project—undergo an iterative process of creating an evidentiary record of components of a proposal.

4. **Decision phase**. Staff develops the tentative decision for the EFSB, which then meets to deliberate and vote on a final decision.

Detailed steps of the current permitting review process are provided in Table 4.

Table 4. — The current application review process: steps of a typical proceeding

Task and subtasks
PHASE 1: PRE-FILING
1. Meet with proponents for heads up on upcoming filing(s); request to include additional analysis in petition
PHASE 2: PROCEDURAL
1. Receive filing
2. Post initial filings and all subsequent docket materials to DPU e-filing website[32]
3. Assign staff to review filing
4. Set up SharePoint file folders and system
5. Review filing for completeness
6. Prepare interagency briefings re: areas of controversy, as needed
7. Schedule regular team meetings
8. Prepare public notice (iterative with project proponent): a. Confirm hearing and site visits with proponent b. Issue notice and publish letter c. Determine language access requirements for affected communities d. Post public notice to DPU e-filing website and DPU/EFSB calendars
9. Create project-specific web page on Mass.gov
10. Organize public comment hearing: a. Secure venue b. Arrange for language interpretation (if required) c. Arrange for hybrid audio/visual setup d. Arrange for police detail

[32] Some docket materials contain critical energy/electric infrastructure information (CEII), or other sensitive information and are accorded confidential treatment under applicable DPU/EFSB regulations. Such materials are maintained at the Siting Division's offices. There is typically a redacted version posted on DPU E-filing.

Task and subtasks

PHASE 1: PRE-FILING

e. Provide ADA accessibility accommodations (if requested)
f. Prepare and review script for presiding officer

11. Host public comment hearing
    a. Set up audio/visual setup at venue
    b. Set up language interpretation (if required)
    c. Post written comments to DPU e-filing website
    d. Review public comments
12. Participate in a site visit
13. Collect public comments and requests for intervention
14. Issue ruling on intervention, procedural schedule, and procedural ground rules
15. Host procedural conference with intervenors (as necessary)

PHASE 3: EVIDENTIARY

1. Proceed with written discovery: round one
    a. Prepare discovery questions, referring to precedent
    b. Review discovery questions
    c. Review responses to discovery questions
2. Receive intervenor pre-filed testimony/review testimony
3. Issue written discovery to intervenors based on pre-filed testimony
    a. Prepare discovery questions, referring to precedent
    b. Review discovery questions
    c. Review responses to discovery questions
4. Proceed with written discovery: round two
    a. Prepare discovery questions, referring to precedent
    b. Review discovery questions
    c. Review responses to discovery questions
5. Host evidentiary hearings (remote)
    a. Set up logistics, coordinating with parties (intervenors), applicant, and stenographer on dates
    b. Set up Zoom meeting
    c. Arrange for language interpreter(s) (if requested)
    d. Draft and review questions
    e. Prepare and review script for presiding officer
    f. Prepare ADA accessibility accommodations (if requested)
    g. Receive and review responses to record requests
    h. Hold technical session (as needed)
    i. Post transcripts to DPU e-filing website
6. Develop briefing schedule
7. Issue rulings as necessary to the parties (participants—applicants, intervenors)
8. Issue briefing questions (as necessary; presiding officer asks parties to answer as part of their briefs)

PHASE 4: DECISION

1. Review briefs from all parties
2. Host meeting(s) to discuss content
    a. Identify issues to be resolved
    b. Develop matrix to chart out what the record says
    c. Explore recommendations from staff on findings/conditions possibilities
    d. Determine whether there should be a broader discussion depending on level of controversy
    e. Explore technical questions

Task and subtasks
PHASE 1: PRE-FILING
f. Explore legal questions
3. Develop briefing deck, as needed
4. Develop outline of the whole decision for staff to contribute their portions
5. Draft tentative decision a. Create first draft b. Review, incorporate edits c. Create slide deck on tentative decision for briefings, as necessary d. Check citations
6. Issue tentative decision to parties and post for the public a. Translate tentative decision as requested
7. Receive public comments on tentative decision a. Post public comments to DPU e-filing website
8. Prepare for Board meeting a. Set meeting date, ensuring that a quorum of the Board will participate b. Communicate meeting date to all parties c. Arrange for language interpretation (as needed) d. Arrange for audio/visual setup e. Set up Zoom meeting f. Provide ADA accessibility accommodations (as requested) g. Provide Open Meeting Law notice h. Prepare scripts for Chair and Presiding Officer
9. Review public comments a. Develop amendment sheet b. Send amendments to Board and parties no less than 24 hours prior to the meeting
10. Host public Board meeting a. Go through meeting dry run and set up audio/visual equipment
11. Issue final decision a. Translate final decision (as needed) b. Issue final exhibit list c. Post transcript to DPU e-filing website

6. Siting Division workload assessment: 2014–2023

Between 2014 and 2023, 45 petitions were filed with the DPU Siting Division, with 41 culminating in final decisions. Table 5 shows the number of filings per project type.

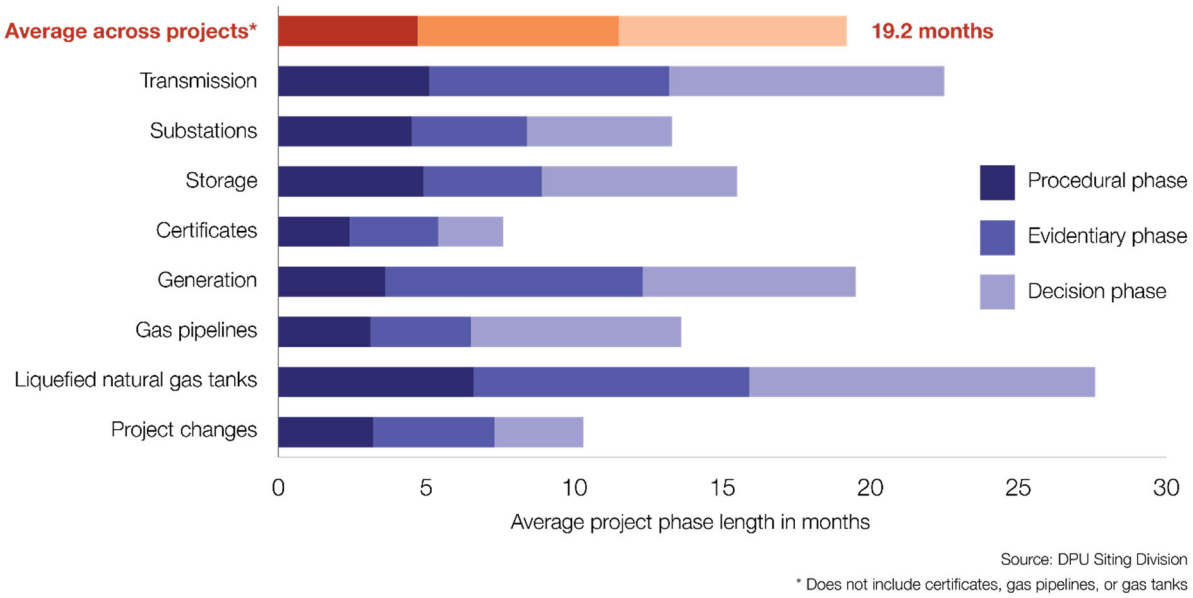
Table 5. — Number of filings per project type: 2014–2023

Project type	Count
Transmission	19
Substation	5
Storage	3
Certificates	5

Project type	Count
Generation	2
Gas pipeline	2
Liquefied natural gas (LNG) tanks	2
Project changes	3
Total	41

Projects took an overall average of 19.2 months from the start of a proceeding to final decision by the EFSB (see Figure 3), not including certificates, gas pipelines, or liquefied natural gas tank filing averages, as these are not project types that reflect the bulk of the Siting Division's additional jurisdictional categories under § 69T. Note also that the processes and lengths summarized in Figure 3 are not inclusive of additional permits obtained through other state, regional, and local authorities, nor reflective of the appeals process.

Figure 3. — DPU Siting Division processes and lengths: 2014–2023[33]



7. Baselining project effort

Prior to this study, the DPU Siting Division did not track staff time spent on its core function of case review, specific or otherwise. Thus, the total number of hours devoted to reviewing specific case types can vary depending on proposal complexity and controversy and may not necessarily be correlated with historical processes and lengths as depicted above in Figure D2.

[33] Pre-filing phase is not included in this calculation.

In lieu of historical project data, GreenerU and the DPU Siting Division used two methodologies to estimate total staff hours spent on case review: (a) a staff-determined assessment of estimated hours spent on docketed case review based on different project types, and (b) a "utilization" proxy and average number of decisions issued per year.

In the first methodology, DPU Siting Division staff estimated 3,172 hours were spent on an average docketed case review process, calculated in Table 6.

Table 6. – Estimated staff hours spent on an average docketed case review process

	Phase				
Staff	**Prefiling**	**Procedural**	**Evidentiary**	**Decision**	**Total**
Director	8	60	100	125	293
General Counsel	8	45	100	125	278
Assistant Director	4	60	150	150	364
Energy Facility Siting Specialist (Regional Planner V)	10	30	250	200	490
Energy Facility Siting Analyst (Regional Planner III)	16	100	500	400	1,016
Presiding Officer (Counsel II)	12	70	300	200	582
Administrative Assistant (Program Coordinator II)	4	30	75	40	149
Total	62	395	1,475	1,240	**3,172**

A second methodology, using staff utilization—defined as the amount of DPU Siting Division staff's available time used for reviewing and developing docketed matters—as a proxy for estimating average staff hours spent on a typical case naturally varies depending on prior experience and length of service. This is expressed as a percentage of total work hours spent on docketed case review.

To calculate staff utilization, assumptions were made per employee based on a 37.5-hour workweek at 46 weeks worked per year, totaling 1,725 hours worked per year per employee (see Table 7). Based on these assumptions, utilization rates were estimated for DPU Siting Division staff and multiplied by hours worked per year (see Table 8).

Table 7. — Assumptions of average annual hours utilized per employee

Assumptions	Hours
Hours worked per week	37.5
Weeks worked per year[34]	46.0
Hours worked per year	1,725.0

Table 8. — Estimated Siting Division percent of staff time spent utilized in 2024[35]

Title	Count	Est. time utilized	Utilized hours/year
Director	1	66%	1,139
General Counsel	1	93%	1,604
Assistant Director	1	62%	1,070
Energy Facility Siting Specialist (Regional Planner V)	1	75%	1,294
Energy Facility Siting Analyst (Regional Planner III)	4	70%	4,830
Presiding Officer (Counsel II)	3	70%	3,623
Presiding Officer (Counsel II—started Sept 2024)	0.3	25%	129
Administrative Assistant (Program Coordinator II)	1	10%	173
Total	**12.3**		**13,860**

Average number of case reviews per year	**4.1**	**Hours per case**	**3,380**

In 2024, eleven projects carried over from previous years for continued review; five new applications were filed; and two decisions were issued.[36] Thus, with an approximate 13,860 of utilized staff hours in 2024 (see Table D7), an average of 770 work hours are spent annually on each project.[37]

Note that "utilized" staff time is not equivalent to productivity. Productive time can be spent on tasks related to trainings, administrative duties, managing staff, appeals, special projects, and more. These tasks can take anywhere between 10% to 90% of staff time, depending on the staff member's role and function within the DPU Siting Division.

Thus, with a total number of "utilized" staff hours amounting to 13,860 in 2024 with 4.1 cases per year on average (based on data between 2014 and 2023), each case review under the current DPU Siting Division's jurisdiction takes an estimated average of 3,380 hours of staff time using a utilization proxy methodology.

[34] Assumptions are two weeks of holidays and four weeks of paid time off on average.
[35] The DPU Siting Division Director, General Counsel, and Assistant Director each developed estimates of their own annual utilization rates; proxies were used for remaining staff based on experience levels, service lengths, and national averages of utilization rates in the professional services fields. See more information at Statista.
[36] All open dockets in front of the DPU Siting Division can be found at https://www.mass.gov/info-details/efsb-and-dpu-siting-open-dockets.
[37] This figure does not account for project complexity.

Utilization hours were also calculated for several representative project types that the Siting Board reviews. This information is summarized in Table 9.

Table 9. — Estimated breakdown of hours by Siting Division staff spent per representative project type

	Project type			
Job title (average no. of individuals per project)	**Transmission**	**Storage**	**Substation**	**Certificates**
Total hours per project	3,630	3,690	2,520	2520
Director (1)	320	430	270	270
General Counsel (1)	300	410	260	260
Assistant Director (1)	390	390	330	330
Energy Facility Siting Specialist (Regional Planner V) (1)	620	670	510	510
Energy Facility Siting Analyst (Regional Planner III) (2)	1,210	970	510*	510*
Presiding Officer (Counsel II) (1)	630	660	480	480
Administrative Assistant (Program Coordinator II) (1)	160	160	160	160

* Assumed one Energy Facilities Siting Analyst instead of two

E. FUTURE STATE: THE DPU SITING DIVISION AND EFSB JURISDICTION

The 2024 Climate Act was passed in anticipation of a large increase in filings for EFSB and DPU Siting Division-jurisdictional projects. This section introduces the context that informed the passage of the 2024 Climate Act, including Commonwealth targets for renewable energy infrastructure such as those outlined in the state's Clean Energy and Climate Plans. Regulated utilities such as Eversource also published plans (i.e., electric sector modernization plans (ESMPs)) that included distribution infrastructure needed to enable distribution level renewable energy interconnection. In Section F, we also account for the recent changes in the federal climate for renewable energy and its potential impact on future project filings.

1. Massachusetts' Clean Energy and Climate Plans

The passage of the 2021 Roadmap Law, "An Act creating a next-generation roadmap for Massachusetts climate policy," requires the EEA Secretary to set statewide emissions limit and sector-specific sublimits every five years. The Commonwealth subsequently published CECPs for 2025/2030 and 2050, which charted a path for the state to reduce greenhouse gas emissions through investments in clean electricity generation, storage, and decarbonization.[38,39] These targets emphasize a need for accelerated permitting processes and an updated electrical grid.

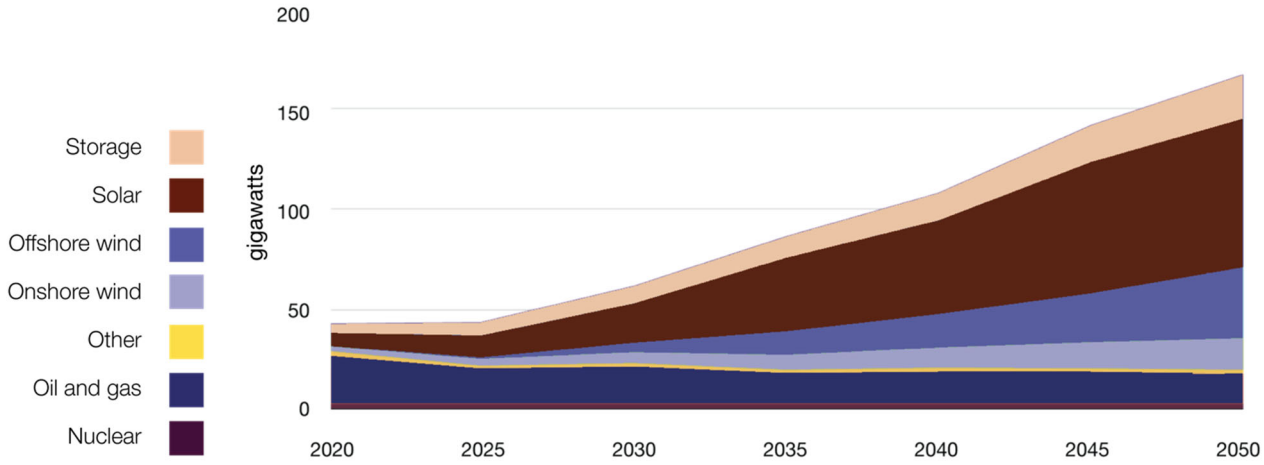
Table 10 shows the significant ramp-up of investments required to meet the Commonwealth's 2050 clean energy infrastructure targets, also illustrated in Figure 4.

[38] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, "Clean Energy and Climate Plans for 2025 and 2030," June 22, 2022. From https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download, accessed November 22, 2024.
[39] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, "Clean Energy and Climate Plan for 2050," December 2022. From https://www.mass.gov/doc/2050-clean-energy-and-climate-plan/download, accessed November 20, 2024.

Table 10. — Clean energy infrastructure targets outlined in the CECP for 2050[40]

Resource	2024 capacity (GW)	2050 CECP targets (GW)	% increase
Offshore wind[41]	2.678	23.0	759%
Onshore wind[42]	0.125	1.0	700%
Solar[43]	5.308	27.0	409%
Storage[44]	0.569	5.8	919%

Figure 4. — Scale-up of clean energy infrastructure targets outlined in the Clean Energy and Climate Plan for 2050[45]



[40] CECP 2050, pg. 24.
[41] In September 2024, Massachusetts announced the procurement of 2,678 MW of offshore wind from three projects: SouthCoast Wind, New England Wind 1, and Vineyard Wind 1. Vineyard Windis still under construction but is expected to be operational by 2030. Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Energy Resources, "Massachusetts and Rhode Island Announce Largest Offshore Wind Selection in New England History," September 6, 2024. From https://www.mass.gov/news/massachusetts-and-rhode-island-announce-largest-offshore-wind-selection-in-new-england-history, accessed November 20, 2024.
[42] Hoen, B.D., Diffendorfer, J.E., Rand, J.T., Kramer, L.A., Garrity, C.P., and Hunt, H.E., 2018, U.S. Geological Survey, American Clean Power Association, and Lawrence Berkeley National Laboratory data release, "United States Wind Turbine Database" v7.1, August 14, 2024. From https://doi.org/10.5066/F7TX3DN0, accessed November 20, 2024
[43] Solar Energy Industries Association, "State overview: Massachusetts." From https://seia.org/state-solar-policy/massachusetts-solar/, accessed November 20, 2024.
[44] Commonwealth of Massachusetts, Department of Energy Resources, Energy Storage Initiative, "ESI goals and storage targets," updated February 15, 2024. From https://www.mass.gov/info-details/esi-goals-storage-target#:~:text=Energy%20Storage%20Study-,Energy%20Storage%20Target,no%20later%20than%20February%2015.&text=On%20February%2015%2C%202024%2C%20EDCs,of%20storage%20in%20the%20pipeline, accessed December 3, 2024. Note that storage capacity for 2024 was reported in megawatt hours, whereas the CECP targets are in megawatts.
[45] CECP 2050, pg. 66.

2. Electric Sector Modernization Plans (ESMPs) and Capital Investment Project (CIP) proposals

On August 11, 2022, the legislature enacted G.L. c. 164, §§ 92B-92C through An Act Driving Clean Energy and Offshore Wind, St. 2022, c. 179, § 53, which requires each electric distribution company operating in Massachusetts to develop a plan to proactively upgrade its electric distribution and transmission systems to enable an affordable, equitable clean energy transition, and to submit its plan to the DPU every five years starting in January 2024. The DPU issued an order approving the ESMPs with modifications on August 29, 2024. The DPU considered the ESMPs to be strategic plans and as such did not pre-approve any costs or specific investments.[46]

On June 13, 2025, the DPU issued an order regarding cost recovery of proposed ESMP investments and determined which costs proposed investments are eligible for an interim, annually reconciling cost recovery mechanism.[47] Notably, although National Grid and Unitil proposed numerous substation and feeder distribution projects in their ESMPs, the DPU found these projects to be ineligible for cost recovery through the interim ESMP reconciling mechanism.[48] In addition, in their ESMPs, NSTAR Electric and National Grid each identified capital investment project (CIP) proposals which are substation and line upgrades to enable interconnection of distributed energy resources using a cost-allocation framework established in D.P.U. 20-75-B (2021).[49] The DPU's ESMP Order requires the electric companies to work towards creating a long-term system planning program to help interconnect clean energy sources into the electric grid, while extending the provisional CIP program in the meantime to allow the electric companies to file proposed CIPs.[50] NSTAR Electric has since filed four CIP proposals, and National Grid has filed one CIP proposal, which are all under review by the DPU.[51]

3. Commission on Energy Infrastructure Siting and Permitting

As discussed in Section B: Introduction and Context, Governor Maura Healey established the Commission on Energy Infrastructure Siting and Permitting (Commission) in 2023 to remove barriers to expeditious and responsible clean energy infrastructure development and meet greenhouse gas emissions limits outlined in the CECPs.

The Commission submitted a set of recommendations to Governor Healey on March 29, 2024, which would: (a) transfer additional permitting authority for larger-scale energy generation, distribution, transmission, and storage projects to the EFSB; (b) impose new requirements on project developers to follow site suitability guidelines, pre-filing engagement, and cumulative impacts analyses; and (c) require

[46] https://www.mass.gov/info-details/electric-sector-modernization-plans-order-findings.
[47] D.P.U. 24-10-A/D.P.U. 24-11-A/D.P.U. 24-12-A.
[48] D.P.U. 24-10-A/D.P.U. 24-11-A/D.P.U. 24-12-A at 103.
[49] D.P.U. 24-10/D.P.U. 24-11/D.P.U. 24-12 at 268.
[50] D.P.U. 24-10/D.P.U. 24-11/D.P.U. 24-12 at 336-339, 343, 348.
[51] D.P.U. 25-30, D.P.U. 25-81, D.P.U. 25-82, D.P.U. 25-83, D.P.U. 25-31.

that permits are issued within a maximum of 15 months following an application's completeness determination.

F. FINDINGS

1. Workload predictions: 2025–2035

While the CECP 2050 targets, ESMP, and CIP proposals project growth in overall energy generation, storage, and transmission and distribution capacities throughout Massachusetts in the coming decade, it is less clear how that growth will translate into discrete permitting applications for review by the EFSB. Furthermore, while the state's plans call for manifold increases in renewable energy infrastructure in the Commonwealth, federal action such as the passing of the 2025 Federal Budget that sunset several renewable energy credits could slow the rate or even pause the filing of future clean energy project filings. Following is a discussion of clean energy infrastructure types, histories, and estimated forecasts for projects that will fall under EFSB jurisdiction after March 1, 2026. The report provides estimated forecasts for the projects as ranges to reflect the uncertainty regarding the impact of federal action on projected workload.

All estimated filing projections are reflected in Table 11, which provides estimates for project volume between 2025 and 2035, also illustrated in Figure 5.

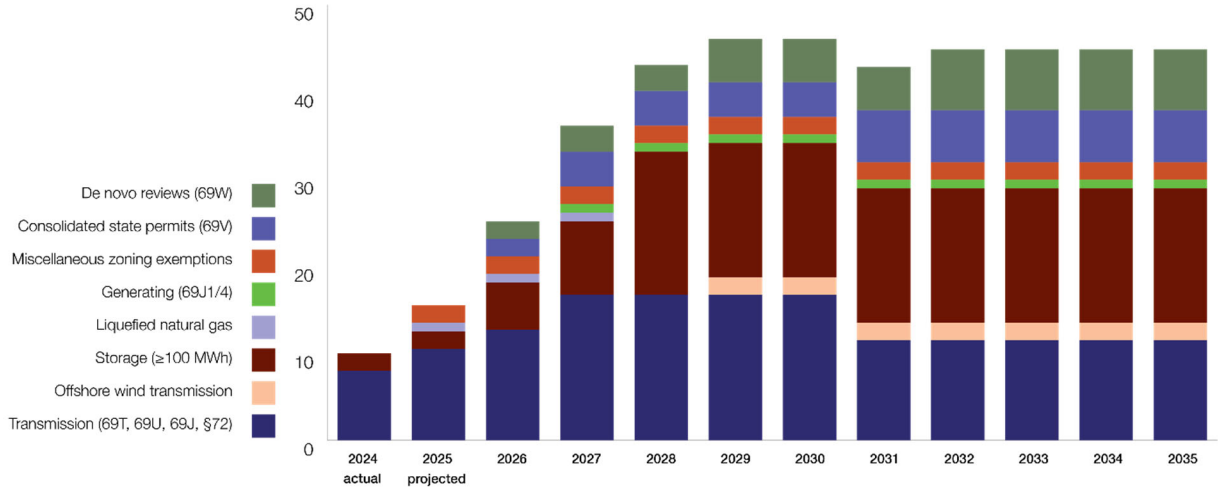
Table 11. — DPU Siting Division estimated case filings by type: 2025–2035

Project type	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Transmission & distribution[52,53]	11	13	17	17	17	17	12	12	12	12	12
Energy storage[54]	2	5	8	16	15	15	15	15	15	15	15
OSW Interconnection[55]	0	0	0	0	2	2	2	2	2	2	2
Anaerobic digestion ≥25MW	0	0	0	0	0	0	0	0	0	0	0
Onshore Wind ≥25MW	0	0	0	0	0	0	0	0	0	0	0
Solar[56] ≥25MW	0	0	0	0	0	0	0	0	0	0	0
Other zoning exemptions	2	2	2	2	2	2	2	2	2	2	2
Consolidated state permit (69V)	0	2	4	4	4	4	6	6	6	6	6

[52] Based on estimates provided by National Grid, September 20, 2024, and Eversource, September 23, 2024.
[53] *Ibid.*
[54] Based on projects in the interconnection queue per ISO-NE; see Table F2.
[55] Based on estimates provided by Zach Gerson, Foley Hoag, in an interview August 7, 2024.
[56] Conservative estimates based on solar trends in Massachusetts and targets set by the CECP of 2050.

Project type	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
De novo review (69W)	0	2	3	3	5	5	5	7	7	7	7
Gas facilities[57,58]	1	1	1	0	0	0	0	0	0	0	0
Generating (69¼)[59]	0	0	1	1	1	1	1	1	1	1	1
TOTAL	**16**	**25**	**36**	**43**	**46**	**46**	**43**	**45**	**45**	**45**	**45**

Figure 5. — DPU Siting Division estimated number of project filings by type: 2025–2035



2. Transmission and distribution

The EFSB will review Consolidated Permit applications for large transmission and distribution facilities under Section 69T. In addition, EFSB will review Consolidated Permits for small transmission and distribution facilities if the applicant opts in, pursuant to Section 69U. Under the de novo review provisions of Section 69W, the EFSB may also review Consolidated Local Permit applications for small transmission and distribution projects that local government officials choose to transfer to the EFSB for adjudication. De novo review by the EFSB can also arise if a Consolidated Local Permit decision issued by

[57] Estimates provided by Eversource and National Grid.
[58] National Grid and Eversource indicated that no gas pipeline projects or storage facilities were proposed for EFSB review; however, National Grid is proposing a rebuild of a liquefied natural gas tank in South Yarmouth that may or may not be EFSB-jurisdictional.
[59] The estimate for generating facilities under §69 J ¼ reflects a "worst case" placeholder if grid-connected fossil-fueled backup generators are sought by new data centers. See https://www.bostonglobe.com/2025/06/06/science/an-economic-opportunity-or-an-energy-crisis-waiting-data-centers-are-coming-massachusetts/.

local government is challenged by the proponent or other parties "substantially and specifically affected" by the local decision.

In addition, the Commonwealth's two largest electric distribution companies, National Grid and Eversource, provided their projections on EFSB-jurisdictional filings over the next ten years. National Grid expected filings with the EFSB to more than double over the next ten years, citing an anticipated set of potential transmission system upgrades, asset condition projects, system capacity and performance projects, and a steady stream of small transmission and distribution requests.[60] Eversource provided projections for similar projects, as well as for the CIP provisional program, through 2035.[61] Many transmission and distribution projects will also be required for the safe interconnection of clean generation and storage projects.

Offshore wind interconnection

While onshore wind energy generation has stagnated over the last decade in Massachusetts, the state has been active in offshore wind procurement. In September 2024, Governor Maura Healey announced the state's largest offshore wind selection to date, procuring an expected 2,678 MW from three projects: SouthCoast Wind (1,087 MW), New England Wind 1 (791 MW), and Vineyard Wind 1 (800 MW).[62] Siting of offshore wind turbine arrays in federal waters is under federal jurisdiction of the Bureau of Ocean Energy Management, but permits to approve transmission facilities to interconnect offshore wind to the grid are issued by states. The EFSB would review consolidated permits for large offshore interconnection facilities under Section 69T.

In Massachusetts, the EFSB has approved three offshore wind projects that are currently in development: Vineyard Wind 1, New England Wind 1, also known as Park City Wind, and SouthCoast Wind. Vineyard Wind 1 is in construction. Two additional offshore wind projects, New England Wind 2 (a.k.a. Commonwealth Wind), SouthCoast Wind Falmouth, have filed with the EFSB but are on hold per request of each developer.

The offshore wind industry is still nascent.[63] In the past several years, higher interest rates, supply chain issues, and subsequent cost increases for materials and services have resulted in more challenging economics for the emerging offshore wind energy industry.[64] Recent federal policy changes regarding

[60] National Grid presentation to DPU Siting Division staff, September 20, 2024.
[61] Eversource presentation to DPU Siting Division staff, September 23, 2024.
[62] Commonwealth of Massachusetts, Governor Maura Healey and Lt. Governor Kim Driscoll, Executive Office of Energy and Environmental Affairs, Department of Energy Resources, "Massachusetts and Rhode Island announce largest offshore wind selection in New England history," September 9, 2024. From https://www.mass.gov/news/massachusetts-and-rhode-island-announce-largest-offshore-wind-selection-in-new-england-history, accessed November 20, 2024.
[63] Legere, Christine, Genter, Ethan, Spillane, Geoff, and Fraser, Doug, Cape Cod Times, "The final blow for Cape Wind," December 1, 2027. From https://www.capecodtimes.com/story/news/2017/12/02/the-final-blow-for-cape/16924189007/#:~:text=Cape%20Cod,the%20middle%20of%20the%20sound, accessed November 23, 2024.
[64] Wasser, Miriam, WBUR, "The headwinds and tailwinds affecting offshore wind in the Northeast, explained," October 5, 2023. From https://www.wbur.org/news/2023/10/05/offshore-wind-massachusetts-vineyard-climate-whale-deaths-lawsuits, accessed November 23, 2024.

offshore wind, including the accelerated expiration of investment tax credits and production tax credits,[65] is likely to reduce the number of filings with the EFSB for offshore wind transmission facilities in the next few years.

Earlier estimates in the 2050 CECP show two to three offshore wind projects per year over the next decade. While this remains an important long-term goal, this report reflects a more cautious near-term potential for delay of additional offshore wind energy deployment in Massachusetts, with an estimated 14 projects resuming applications for EFSB transmission interconnections in the latter half of the decade, with an estimate of two applications per year starting in 2029.

3. Storage

Energy storage systems, also known as battery energy storage systems (BESS), encompass

> a diverse set of technologies capable of absorbing energy, storing it, and later discharging the energy to meet customer and grid demands. This array of technologies—spanning time-tested pumped hydro (one of the earliest storage technologies), advanced lithium-ion batteries entering U.S. markets today, and numerous emerging technologies in research, demonstration, and deployment stages—can shift electric generation across minutes, hours, days, weeks or even seasons. Specific technologies vary in maturity, capabilities, and costs, but collectively can provide the grid essential services across the electricity chain from the point of generation to the point of consumption. Storage applications range from directly participating in wholesale markets providing energy, capacity, and ancillary services, to serving as "non-wires alternatives" that defer transmission and/or distribution capacity investments, to supporting customers through "behind-the-meter" applications such as providing backup power.[66]

The EFSB will review Consolidated Permit applications for large storage facilities under Section 69T. In addition, EFSB would review Consolidated State Permit application for small storage under Section 69V, and local permitting of small storage under the de novo provisions of Section 69W. The 2024 Climate Act includes a specific mandate that requires Massachusetts EDCs to enter into long-term contracts equal to approximately 5,000 megawatts of energy storage by 2030.[67]

Currently, the Siting Division has three energy storage systems under review that are seeking zoning exemptions: (1) an approximately 700 MW / 2,800 MWh battery energy storage system proposed in the City of Everett; (2) a 180 MW Battery Energy Storage System and related electrical infrastructure proposed in Oakham, and (3) a 125 MW Battery Energy Storage System and related infrastructure

[65] See H.R. 1, 119th Cong. § 70114 (2025)
[66] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Energy Resources and E3, "Charging forward: energy storage in a net-zero Commonwealth," December 2023. From https://www.masscec.com/sites/default/files/documents/Charging%20Forward%20%282023%29.pdf, accessed November 22, 2024; referenced from Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Energy Resources, Emerging Technology Division, and Massachusetts Clean Energy Center, "State of Charge: A Comprehensive Study of Energy Storage in Massachusetts," 2016. From https://www.mass.gov/doc/state-of-charge-report/download, accessed November 22, 2024.
[67] St. 2024, c. 239, § 98.

proposed in Tewksbury.[68] To date, the DPU has issued two zoning exemptions approvals to construct two battery energy storage systems in the Towns of Medway and Carver.[69]

According to ISO-New England, 38 BESS with net capacities of 100 MW or greater are in the current interconnection queue with expected operations dates starting in 2025.[70] Table F1 shows a distribution of the number of projects expected to be operational by year and Table F2 shows projects expected to become operational between 2025 and 2029. Although BESS projects listed by ISO-NE may not necessarily be completed, the report does provide an indication of the level of commercial interest in developing such facilities.

Table 12. — Distribution of energy storage systems in Massachusetts with estimated commercial operation dates in 2025–2029[71]

Year	No. BESS projects
2025	6
2026	8
2027	16
2028	6
2029	2

Under the de novo review provisions of Section 69W, the EFSB may also review Consolidated Local Permit applications for small energy storage projects that local government officials choose to transfer to the EFSB for adjudication, or if a Consolidated Local Permit decision issued by local government is challenged by the proponent or other parties "substantially and specifically affected" by the local decision. The forecast includes a small number de novo applications for small CEIF.

4. Generation

Solar

The EFSB will review Consolidated Permits applications for large solar facilities under Section 69T. In addition, EFSB will review Consolidated State Permit applications for small solar under Section 69V, and Consolidated Local permitting of small solar under the de novo provisions of Section 69W. According to

[68] Jupiter Power, the developer of a 200 megawatt ("MW")/800 megawatt-hours ("MWh") ("BESS") and associated infrastructure, in Westfield, withdrew the Westfield project.
[69] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Public Utilities, DPU Zoning Exemption Orders. From https://www.mass.gov/info-details/dpu-zoning-exemption-orders, accessed January 7, 2025. On February 18, 2025, jurisdiction to issue zoning exemptions transferred from the DPU to the EFSB (except for the City of Boston, where zoning exemption authority will transfer to the EFSB on March 1, 2026.
[70] ISO-New England, Interconnection Request Tracking Tool, Generator Interconnection Queue, as of November 18, 2024. https://irtt.iso-ne.com/reports/external, accessed November 22, 2024.
[71] ISO-NE.

the Technical Potential of Solar study conducted in 2022, there is more than enough potential solar capacity in Massachusetts to accommodate the clean energy transition—15 to 18 times more than the projected capacity identified in the CECPs.[72] Some factors make the growth of the solar industry a bit of a wild card. Massachusetts has the potential to site up to 70,425 ground-mounted solar arrays (≥1 MW) totaling 359 GW of solar; however, when factoring in "more suitable" site conditions, only 23 GW of such ground-mounted solar capacity remains.[73]

Historically, with a relatively small geographic landmass and expensive real estate costs, Massachusetts has not been home to large-scale ground-mounted solar arrays.[74] To date, Massachusetts has yet to see a PV project cross the 25 MW threshold that would classify it as a Large Clean Energy Generation Facility.[75]

As with offshore wind, state goals call for increased solar generation, anticipating a need for a more than five-fold increase of the 5,308 MW available as of Q2 2024 to 27 GW in 2030, as targeted in the 2050 CECP.[76,77] Given the limitations of available and suitable land for large ground-mounted PV installations, and the maximum size limitations for eligible projects in the Solar Massachusetts Renewable Target (SMART) program (which are well below 25 MW) this report does not anticipate any PV installations reaching the large CEIF threshold, although it is possible that some could in the future.

Small PV facility developers are expected to receive most, or all, of their required permits through Consolidated Local Permits, issued by local government pursuant to DEOR regulations. To the extent that additional state permits are required, many developers are expected to obtain them directly from the appropriate state agency having jurisdiction, rather than through the optional Consolidated State Permit, available from the EFSB under Section 69V. However, the EFSB case forecast includes a small and growing number of Consolidated State Permits (Section 69V). Actual interest in Consolidated State Permits could vary from this estimate, and will need to be re-evaluated as the program unfolds.

Anaerobic digestion

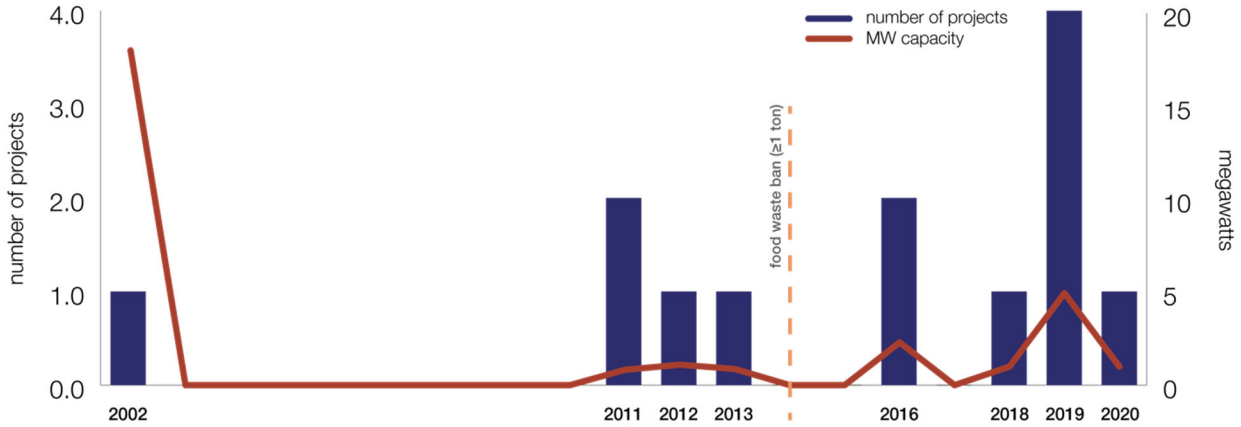
Anaerobic digestion is the process of converting organic waste from agricultural, industrial, and/or wastewater treatment plants into renewable biogas.[78] The EFSB would review Consolidated Permit

[72] Synapse Energy Economics, Inc., "Massachusetts Technical Potential of Solar," 2022, page 27. From https://www.mass.gov/doc/technical-potential-of-solar-in-massachusetts-report/download, accessed November 17, 2024.
[73] Technical Potential of Solar, pgs. 26, 31.
[74] Lists of Qualified Generation Units, RPS Class I Renewable Units spreadsheet, SMART solar tariff generation spreadsheet, and SREC I qualified generation units spreadsheet.
[75] The largest PV facilities installed to date have not reached the 25 MW threshold. See https://www.mass.gov/info-details/utility-interconnection-in-massachusetts
[76] SEIA.
[77] CECP 2050, pg. 24.
[78] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Environmental Protection, Clean Energy Results Program, "MassDEP Fact Sheet: Biogas Production," June 2018. From https://www.mass.gov/doc/biogas-production/download#:~:text=Anaerobic%20Sludge%20Digestion%20in%20Massachusetts,WWTP%2C%20and%20the%20Rockland%20WWTP, accessed November 19, 2024.

applications for large anaerobic digestion projects under Section 69T. In addition, EFSB would review Consolidated State Permit applications under Section 69V, and de novo Consolidated Local Permits under Section 69W.

In 2014, MassDEP established a ban on discarded food from businesses and institutions disposing one ton or more per week; in 2022, that threshold was lowered to half a ton per week.[79] Composting programs have also increased statewide in the last decade. As of 2023, there has been a 73% increase in municipal food waste collection from 2014 (from 24 to 89 of Massachusetts' 351 cities and towns).[80] Even with an increase in composting and anaerobic digestion disposal methodologies in the last decade, only 13 anaerobic digesters have been approved for operation in Massachusetts with the majority of projects falling below 5 MW capacity (see Figure F2). The state's largest digesters at Deer Island Wastewater Treatment Plant in Winthrop, Massachusetts, which help process wastewater from the Massachusetts Water Resources Authority, have a nameplate capacity of 18 MW.[81] Electricity generation from anaerobic digestion is not detailed or targeted in the CECP for 2050.

Figure 6. — Anaerobic digestion projects and megawatt capacity in Massachusetts: 2002–2020[82]



Thus, while the EFSB is expected to have jurisdiction over permitting for large-scale anaerobic digestion facilities (≥25 MW), no proponents for projects of this size and capacity are forecast to file for permits within the near-term horizon. Under the de novo review provisions of Section 69W, the EFSB may also review Consolidated Local Permit applications for small anaerobic generation facilities that local

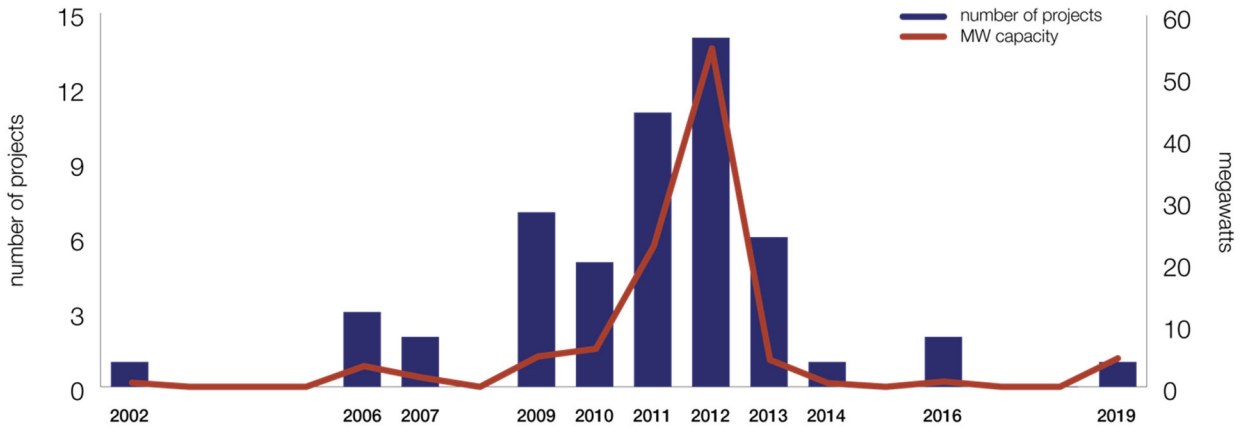
[79] Commonwealth of Massachusetts, Department of Environmental Protection, press release: "New waste disposal ban regulations take effect today," November 1, 2022. From https://www.mass.gov/news/new-waste-disposal-ban-regulations-take-effect-today, accessed November 20, 2024.
[80] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Environmental Protection, 2023 municipal solid waste and recycling survey responses. From https://www.mass.gov/doc/2023-municipal-solid-waste-recycling-survey-responses/download, accessed November 23, 2024.
[81] Commonwealth of Massachusetts, Department of Energy Resources, Renewable and Alternative Energy Division, "Lists of Qualified Generation Units: RPS Class I." From https://www.mass.gov/doc/rps-class-i-qul/download, accessed November 19, 2024.
[82] Lists of Qualified Generation Units: RPS Class I.

government officials choose to transfer to the EFSB for adjudication, or if a Consolidated Local Permit decision issued by local government is challenged by the proponent or other parties "substantially and specifically affected" by the local decision. The forecast includes a small number de novo applications for small CEIF.

Onshore wind

The EFSB would review consolidated permits for large onshore wind facilities under Section 69T. In addition, EFSB would review state consolidated permits for small onshore wind under Section 69V, and local permitting of small onshore wind under Section 69W. Onshore wind energy generation has historically been limited in Massachusetts, with a relatively small geographic landmass and limited windy conditions. As of August 2024, 49 wind projects with 92 turbines generating a total of 125 MW have been built since 2001.[83] The largest onshore wind project in Massachusetts to date, and the only system larger than 25 MW, is the 19-turbine Hoosac Wind Power Project with a capacity of 28.5 MW in Florida and Monroe.[84,85] Figure F3 illustrates the number of onshore wind projects per year in Massachusetts and nameplate capacities.

Figure 7. — Count of all onshore wind projects and annual generation capacities in Massachusetts: 2002–2019[86]



While the CECP 2050 targets a seven-fold increase in onshore wind generation from current levels to 1 GW by 2050, there is no evidence to suggest that new onshore wind projects are currently in

[83] U.S. Wind Turbine Database.
[84] Avangrid, "Hoosac Wind Power Project Fact Sheet." From https://www.avangrid.com/documents/453723/3564177/hoosac-fact-sheet.pdf/ff22013e-5b02-b4fe-01b5-c499192e639a?t=1664386738112, accessed November 22, 2024.
[85] Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs, Department of Energy Resources, "RPS Class I renewable energy generation units," updated June 1, 2023. From https://www.mass.gov/doc/rps-class-i-qul/download, accessed November 22, 2024.
[86] Lists of Qualified Generation Units: RPS Class I.

development.[87] Thus, a placeholder of 0.6 annual large-scale onshore wind projects after 2026 is included in this forecast.

Under the de novo review provisions of Section 69W, the EFSB may also review Consolidated Local Permit applications for small wind energy generation projects that local government officials choose to transfer to the EFSB for adjudication, or if a Consolidated Local Permit decision issued by local government is challenged by the proponent or other parties "substantially and specifically affected" by the local decision. The forecast includes a small number de novo applications for small CEIF.

5. Productivity challenges: key themes

At the same time as project volume is expected to increase significantly, and with shorter review periods, there are also productivity challenges within current practices of the DPU Siting Division that could be examined more closely. Based on management and staff interviews and survey input, GreenerU identified a set of key themes that contribute to productivity challenges within the DPU Siting Division:

- **Management is a bottleneck.** The management team (Director, General Counsel, Assistant Director) acknowledged that they play a disproportionate role in copyediting, fact-checking, and in some cases rewriting tentative decisions, which causes a slowdown in project completion. Reasons cited were their collective institutional knowledge of case history and precedent, better visibility of the surrounding policy landscape, and a lack of standardization, training materials, and templates for their particular subject area expertise. With significant long-term staff turnover in 2023, clear instructions for newer staff have not yet been well documented.

- **Management is overburdened.** The management team devotes a relatively large amount of work time to the Siting Division's core activities, in addition to responding to requests from the Secretariat, and participating in additional projects (e.g., working with the Commission) and ad-hoc requests. In addition to project slowdowns, the management team runs the risk of burnout.

- **Jurisdictional changes create workload unpredictability**. Preparing for changes in permitting processes directed by the legislature will create a substantial increase in workload throughout 2025 and through the first half of 2026. Not only will there be a significant increase in projects for review in 2025; but the additional workload includes leading a public rulemaking process to promulgate regulations, guidelines, parameters, application requirements, timelines, and a new filing and public reporting mechanism. A more detailed list of Siting Division transition tasks is included in Section H: Next Steps: Roadmap to a Smooth Transition Period.

- **Current procedures are a very heavy lift.** The management staff's approach to each review and decision is with the highest standards in mind, bulletproofing decisions against the

[87] CECP 2050, pg. 24.

potential for the Supreme Judicial Court to overturn a matter on appeal. The Siting Division has a good track record on appeal with the Supreme Judicial Court affirming many Siting Board decisions. Siting Board decisions are often around 100-150 pages. Table D3 (*see* Section D: Current State of the DPU Siting Division) outlines the current permitting process for most proceedings, which are extensive, time-consuming efforts. Management staff will be unable to continue these processes when the volume of proceedings doubles or triples.

- **Recruiting, hiring, training, and retention are challenging.** Positions within the DPU Siting Division require a combination of versatility and specialization in a variety of fields, including law, engineering, energy and environment, public health, and more. Competition from the private sector, which typically offers higher salaries, and even other public agencies, presents significant challenges in recruiting and retaining the most qualified candidates. Additionally, there is a steep learning curve for staff, even with training materials, requiring a significant amount of hands-on work experience through the relatively long permitting cycles.

G. RECOMMENDATIONS

Despite the more than three-fold increase in anticipated project filings in 2026 and beyond, this report describes attempts to mitigate proportional staffing increases for the DPU Siting Division through a series of recommendations, including workplace efficiencies and improvements to the filing application process. These recommendations are described below.

1. Changes to current practices

Table G1 is a distillation of recommended action items for the current DPU Siting Division management team, which was vetted through extensive discussion with the DPU Siting Division management team.

Table 13. — Recommended action items for DPU Siting Division

Objective	Action	Assignee(s)
1. Restructure management work responsibilities	Restructure departmental organizational chart and increase staffing capacity (see Figure G1)	Director
	Delegate more responsibilities to staff to free up time to respond to Secretariat requests, special projects, and guiding/managing rather than doing	Managers
	Manage Secretariat requests with better investigation and understanding of what's requested	Managers
	Seek management and leadership training to prepare for new responsibilities	Managers
	Rethink how the work on proceedings could be further broken down into discrete tasks	Managers
2. Redistribute responsibilities among and empower staff	Prioritize redistribution of tasks	Managers
	Hand over standardization of form, formatting, style to a delegated staff person	Managers
	Redistribute training and onboarding; distribute responsibility of developing and providing specific trainings and tutorials to specific staff members	Managers
	Emphasize urgency: state deadlines and encourage others to state deadlines	Managers
	Develop standards for issuing a public notice and have proponents do the legwork, based on factual and neutral language - not "advocacy"	Managers
	Develop written documentation on processes and procedures, including examples, tools, and templates	Staff
	Create a feedback loop with employees by regularly incorporating feedback as an item on all meeting agendas	Managers
	Create a playbook and reassign public hearing logistics responsibilities to staff or outsource	Director
	Develop a procedures playbook and have a consultant review for clarity	Assistant Director
	Check with the new DPU Division of Public Participation on assuming responsibilities associated with pre-filing requirements	Director

Objective	Action	Assignee(s)
	Assign routine industry updates and education to staff to summarize and distribute	Managers
3. Streamline and expedite review processes	Develop EFSB 2.0 application with overall process efficiency in mind	EFSB 2.0 implementation
	Review draft decisions earlier in the process	Staff
	Consider standard conditions that may warrant less in-depth review	EFSB 2.0 implementation
	Explore "tiers" of intensity of review—which proceedings warrant lengthier decision language, which could be shorter and more succinct	Staff
	Use forms and standardization for some decisions; create templates and boilerplates for some application types; explore more concise, yet legally robust ways of drafting orders and decisions	Staff
	Identify staff's areas of expertise in Wiki and/or an expanded-detail organizational chart and encourage staff to make full use of it	Assistant Director
	Create a variety of checklists to ensure that best practices are consistently used in recurring division procedures and activities	Managers
4. Increase staff's understanding of decisions and issue-spotting	Diversify training materials, guidelines, example products	Staff
	Develop a set of brief case studies as training materials	Staff
	Use staff Wiki for content organization and searchability	Staff
	Offer case studies and troubleshooting during staff meetings	Staff
	Create accountability mechanisms to ensure that work products consistently meet expectations	Managers
	Disseminate responsibilities among staff, e.g., peer review, mentorship, and education	Managers
	Conduct case lookbacks (feedback sessions) to identify where things were held up and why, how staff can learn	Staff
	Develop self-administered quizzes and tests	Staff
	Implement "productive struggle" to encourage independent learning	Managers
	Formalize a training and education system to go from (a) concept familiarity (new hires) to (b) proficiency doing to (c) mastering to (d) teaching others (management level); organize workload assignments that mirror these stages of progression	Managers
5. Elevate staff's writing output	Enforce requirement of staff proofreading	Assistant Director
	Adjust case schedules so that hearing officers have ample time to do a final legal review of entire document	Assistant Director
	Encourage peer review as a positive from the lens of whether a non-expert could understand what's written	Managers
	Hire one or more staff writer/editors to allow technical staff to focus on subject matter expertise	Writer/editor
	Offer a writing boot camp, tools, and other training materials	Writer/editor
	Offer a training on tactful peer editing techniques	Writer/editor
	Write with a single unified voice	Writer/editor
	Question meaning and ask for clarification before making substantive changes	Director
	Provide meeting facilitation training for all staff	GreenerU

Objective	Action	Assignee(s)
	Audit how meetings are being conducted and determine frequency needed	Managers
6. Professionalize meeting management	Develop an annual staff meetings calendar and plot it with required agenda items	Managers
	Cancel standing meetings or make them optional if there is no urgency	Managers

2. Priority areas

While there are many areas noted above where the siting process can and must be improved for efficiency gains, there are some opportunities that are especially significant and warrant particular focus and priority.

The process of preparing for, writing, editing, reviewing, and approving Tentative Decisions is the single most time-intensive undertaking of the Siting Board's current adjudicatory work on cases, where greater efficiency is necessary.

Shorter decisions that remain legally robust

- Use numbered "findings of fact" rather than more wordy text to present evidence
- Make greater use of the newly established baseline environmental, health, and safety standards to the greatest extent possible in addressing contested issues, and making necessary findings
- Rely on new quantitative methods, such as EFSB's route/site scoring, EEA's site suitability scoring, and cumulative impact analysis scoring methods, all currently in development. Although these are not dispositive of the issues, these quantitative approaches can simplify the description, analysis and findings on these issues.
- Extensive reference to regulations and guidance, rather than repetition of requirements in the decision
- Focus the details on contested issues rather than on standard process that is not contested
- Develop a prototype of a streamlined decision, using a representative prior decision, for review and comment

Standard applications

- Past EFSB practice has not made use of standard application forms. The new application process will help to ensure that the necessary information in the initial application is complete and ready for review on the prescribed timeline
- An improved filing portal, with user-uploaded files, will help to streamline administrative functions and make the information more transparent and accessible to stakeholders.

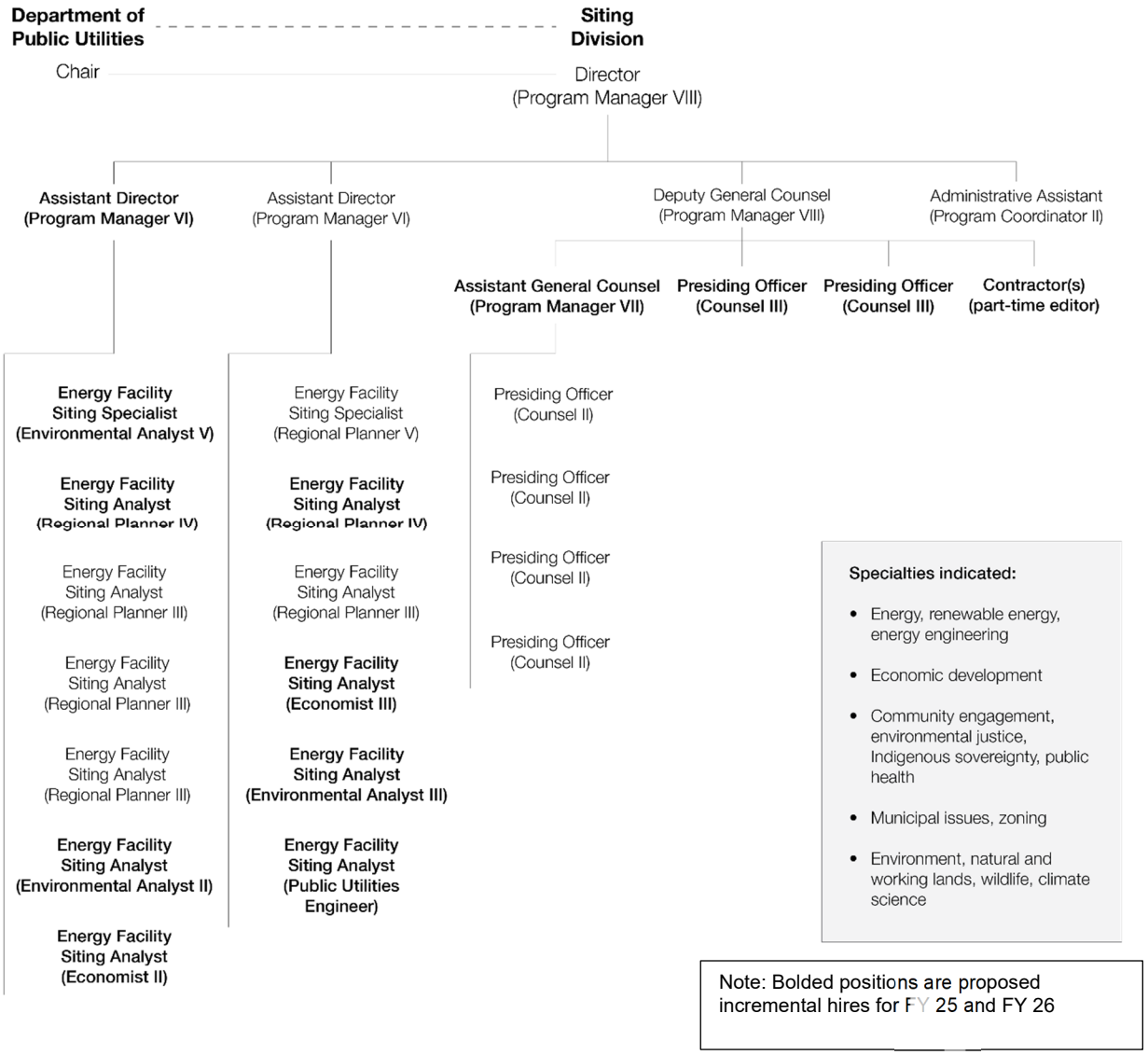
Applicant-provided draft permits

- As part of the initial application, the applicant must provide all draft permits and approvals sought in the proceeding, in the prescribed format, inclusive of standard conditions. This advances consideration of the applicant's request in a very tangible and useful manner.
- The applicant will be required to identify any deviations from established permit program requirements, standards, and conditions. This will help focus attention of all parties and the Board on critical review areas in the proceeding, from the start.

3. Staffing changes

Given projected doubling in case filings in 2026 and substantially more cases beyond 2026, coupled with significant efforts required to prepare for the transition to a consolidated and expedited permitting process starting March 1, 2026 for projects filed on and after July 1, 2026, it is strongly recommended that the DPU Siting Division hire at least 12 additional staff members in 2025 and 2026 (see Figure 8).

Figure 8. — Proposed DPU Siting Division organizational chart: 2025



Based on the above research, the Siting Board could receive upwards of 35 petitions in a year, starting in 2027 when the provisions of the 2024 Climate Act are fully in effect (shown in Figure F5 in Section F: Future State: The DPU Siting Division and EFSB Jurisdiction above). Specifically, over the next 10 years (2026–2035), the Siting Board may receive an average of 42 new petitions each year, ramping up to a projected peak in 2029-2030. By comparison, the Siting Board received a total of 41 project filings from 2014 to 2023, averaging a total of 4.1 petitions per year. This change would represent more than 10 times the number of filings a year on average, workload and process efficiencies notwithstanding.

Several educated assumptions are necessary to determine staff productivity in 2025 and beyond:

- Several factors may increase or decrease workload intensity, as described in Table 14.
- New staff will require an organized, prolonged training period to ramp up for current and anticipated workloads.
- New staff will not be fully productive on docketed filings during their first or even second years, and their productivity rates on contributing to docketed filings are likely to vary based on years and relative levels of experience upon hire (see Table G4).
- If there are periods of time where additional help is required, contractors with appropriate experience may be brought on board to assist.
- Prefiling support from the DPU Division of Public Participation and more transparent procedures from the Siting Board, will help to manage new workflows.
- An improved electronic filing system and other IT will help reduce demands on administrative staff, and administrative functions across the Siting Division.

Table 14. — Factors affecting DPU Siting Division staff workload intensity

Factor	Effect	Workload ^/v
2024 Climate Act	Changes to the EFSB jurisdiction will take effect March 1, 2026. DPU Siting Division staff will need to prepare for such changes to take effect while managing existing and upcoming filings.	^
Electric sector modernization plans (ESMPs)	The DPU issued an order on August 29, 2024, approving most proposed components of the ESMPs for Massachusetts' three major electric distribution companies, National Grid, Eversource, and Unitil. The ESMPs essentially lay out the electric distribution companies' plans to increase grid capacity and improve resilience to meet the Commonwealth's CECP goals, which will put forward a considerable number of multijurisdictional transmission line projects starting in 2025.	^
12- or 15-month approval timeframe	Included in the 2024 Climate Act is a 15-month period for all EFSB-jurisdictional approvals before constructive approval is granted or 12 months for smaller projects requesting de novo adjudication. This compressed timeframe will intensify the amount of work for staff members to review cases that may be complex and controversial.	^
30-day completeness determination	The legislation indicates that project proponents can expect an application completeness determination within 30 days of submission, upon which the clock starts for the 12- or 15-month review process. There are currently no provisions for staff to postpone or stagger decisions if there is an influx of proposals; however, if constructive approval occurs, the case is concluded with standard conditions and in a timely manner, albeit without a Siting Board vote and decision.	^
Staffing ramp-up	Recruiting, hiring, and training qualified staff is an initial challenge that is complicated by the unique and specialized nature of the work of the DPU Siting Division. Hands-on experience is required to grasp project complexities, histories, and controversies involved in proceedings. It will take time for new staff to begin to tackle the volume of work the Siting Division is expected to face starting in 2025.	^

Increased staff size	While recruiting and training new staff is a challenge, a larger staff will eventually be trained, become proficient, and begin to demonstrate the competencies needed to keep up with workload.	✓
Internal process efficiencies	A series of suggestions for internal efficiencies, including restructuring management work responsibilities, redistributing work responsibilities and empowering staff, streamlining the application and review processes, improved training and resources, and more, should improve upon internal efficiencies (see Table G1).	✓
Community liaison	The DPU's Division of Public Participation is expected to play a role in assisting both project proponents, host communities, and other stakeholders during the pre-filing stages in understanding application requirements, increasing engagement for better project outcomes, and avoiding controversies that can lengthen and complicate decisions. The DPP will operate as a separate non-adjudicatory function and will not be involved in adjudicatory processes.	✓
Regulations and guidelines	The rulemaking process will be a key determinant in establishing clear regulations and guidelines for project proponents to meet standards for pre-filing stakeholder engagement, assess site suitability, and perform cumulative impact assessments prior to commencement of the application process. More transparent expectations and proponent responsiveness during the project siting and development phase will lead to a smoother permitting process.	✓
Application process	The Siting Board will develop a standard application process that aggregates information required for review by the Siting Board, and other affected state and local agencies that will provide recommended draft permit conditions during the Siting Board review process. Coupled with a new online dashboard to track project and regulatory review status, these measures should help improve overall efficiency of the review process for the Siting Board, other state and local agencies, stakeholders, and the public.	✓
Community education	One aspect of the clean energy transition that can lead to community opposition is a lack of trustworthy, up-to-date information on available technologies, safety protocols, benefits, and stakeholder participation opportunities and rights. Ensuring that information obtained during regulatory review is reliable, clear, easily located in online file repositories, and responsive to community concerns will hopefully result in better communication and cooperation between project proponents and host communities and other stakeholders.	✓

4. Recruiting and hiring

With an increased volume of work anticipated and larger staff size, the DPU Siting Division will need to exercise best practices in recruiting and hiring new staff. Table 15 provides a set of recommendations.

Table 15. — Recommendations for recruiting and hiring DPU Siting Division staff

Objective	Action	Assignee(s)
Create a talent pipeline	Establish relationships with area university career offices, including at community colleges, that offer programs connected with clean energy, engineering, and public service	EEA

Objective	Action	Assignee(s)
	Create contract-to-hire positions to ensure staff are a good fit before offering permanent positions	Managers
	Create a pipeline of candidates by offering internships and fellowship positions that can take on entry-level standardized tasks, sit in on meetings, read filings, and familiarize themselves with the work	Staff
	Identify ideal candidate profile / brainstorm ideal candidates / reflect on what characteristics make them ideal	Managers
Promote the work of the DPU Siting Division	Consider a "brand refresh" of the DPU Siting Division / EFSB	Staff
	Identify and intentionally build on the culture of the Siting Division to capitalize on the unique benefits of working there	Managers
	Develop a social media presence that provides a hint of what the staff and culture are like with photos, video, posts	Staff
	Create a recruiting video of staff introducing themselves and the work of the DPU Siting Division to post on LinkedIn (see DPU Commissioner videos for reference)	Staff
Review job descriptions for inclusivity, diversity, and clarity	Expand job descriptions to include expertise and/or backgrounds in a larger array of subject areas reflective of Commission recommendations	Managers
	Avoid biased language in job descriptions; here is a resource by Avarna to help think through language that can skew in the direction of gender-biased language	Managers
	Emphasize benefits of positions and mission-driven nature of the work	Managers
	Emphasize skills-based position qualifications focus per Executive Order 627[88]	EEA
Amplify efforts to recruit qualified candidates	Develop a recruitment process and procedures manual	Assistant Director
	Review and rewrite job descriptions to reflect the culture, clarify the skillsets needed, and check for inclusive language	Assistant Director
	Encourage all staff to participate in mentoring programs at alma maters	All staff
	Participate in job fairs at colleges with applicable degree programs	All staff
	Request assistance in recruiting for job openings through expanded personal networks (DPU, EEA, etc.); be direct and specific in your request	All staff
	Nurture relationships and memberships with professional associations aimed at expanding access	Director
	Use personal LinkedIn and other social media accounts to post new positions and ask connections to repost	All staff
	Use recruiters as needed for challenging positions to fill	Director
Be discerning in interviews	Use the STAR method for candidate interviews: • SITUATION: What situation were you in? • TASK: What task did you need to accomplish? • ACTION: What actions did you take to accomplish this task? • RESULTS: What were the results of these actions?	Hiring managers
	Interview with the following approach: • List the critical performance areas for the job	Hiring managers

[88] Commonwealth of Massachusetts, Office of Governor Maura Healey, "Executive Order 627: Instituting skills-based hiring practices." From https://www.mass.gov/doc/skilled-based-eo/download, accessed December 4, 2024.

Objective	Action	Assignee(s)
	• Create open-ended questions that query the candidate's experience at those tasks • Gather data on the situation, task, action, and result (STAR) in the candidate's answer (see above) • Evaluate the answers for demonstrated job performance • Compare their answers to other candidates' answers (this is sometimes done with a point system) (See Claudia Fernandez's article in The Management Moment, "The Behavioral Event Interview: Avoiding Interviewing Pitfalls When Hiring, for additional detail.)	
	Use "action/task" or "audition" interview formats by providing a scenario and allowing candidates a set amount of time to prepare a solution.	Hiring managers
	Keep in mind while interviewing: • Look for versatility—someone who doesn't mind delving into tasks that may not be directly related to their job, but is helpful to their teammates • Look for signs of service orientation, particularly through anecdotes or gestures that indicate a focus on being genuinely helpful • Look for indicators that a candidate can absorb, process, and apply new knowledge and information	Hiring managers
	Additional suggested interview questions: • What is your approach to understanding the perspectives of colleagues from different backgrounds? • How would you handle a situation where a colleague was being culturally insensitive, sexist, racist, or homophobic? • How would you advocate for diversity, equity, and inclusion with colleagues who don't understand its importance? • Can you give me an example of how you make your direct reports feel a sense of inclusion, belonging, and equity on a daily basis? • How do you approach situations where you are given a task you've never done before? • Describe a situation where you've had to offer challenging feedback to someone. How did you prepare? • Describe a situation where someone gave you feedback that was difficult to hear. How did you respond? • What questions do you have for us? (Leave plenty of time for this.)	Hiring managers
Check references		Hiring managers

5. New employee training

Current onboarding and training materials are a mixture of general handbooks and procedural guidelines. Read without context, new staff may be overwhelmed and unable to absorb relevant new material.

Following are recommendations to set up training materials for new staff:

- Organize all materials on the Wiki and from the perspective of a new user
- Ask for feedback from new users as to what information can be located intuitively
- Provide an overall contextual document describing the work of the Siting Division, its jurisdiction, and the clean energy transition
- Provide case studies of the different EFSB filing types, summarizing the process and outcomes
- Provide one-pagers defining and illustrating DPU Siting Division- and EFSB-jurisdictional projects
- Provide a map or illustration of which entities participate in different types of infrastructure and describe the role each plays
- Provide a description and/or illustration of the structure of the DPU and how divisions interrelate to one another
- Vary material types to accommodate different learning styles (offer visuals, videos, discussions)
- Tell stories—record and edit conversations about historical decisions, complicating factors, processes, and outcomes
- Provide informational interviews with staff members
- Have staff take on more responsibilities for pieces of onboarding and training
- Spell out all abbreviations and acronyms in training materials (avoid jargon)
- Assign new staff to shadow seasoned staff on a case from start to finish
- Build on existing documentation to codify "how to" messaging and "tips for success"
- Remove any documentation that is old, unhelpful, or disconnected to other material
- Adapt the DPU Case Handbook to be specifically relevant to DPU Siting Division casework
- Consolidate all training materials into the same format and avoid redundancies
- Offer brief explanatory text for each training component
- Consider the online tool Scribe, a step-by-step guide generator that documents processes
- Consider updating and modernizing documents that are more than three years old
- Create a spreadsheet with links to all existing informational documents that are still useful and include a brief overview of what each one covers
- Evaluate current materials to see what information would be useful to move over to the new format and home
- Make a list of all other topics that should be addressed in training materials
- Prioritize this list, assign responsible parties, and set deadlines
- Use an existing procedure to document the steps

6. Project management software

DPU Siting Division staff currently uses an Excel spreadsheet model for project management and procedural schedules, a methodology that does not allow for tools such as task assignment, calendar management, document sharing, or other work management.

GreenerU recommends the adoption of Smartsheet, which can manage processes such as employee onboarding and training and project and pipeline management.

7. Annual budget

Table 16 shows an estimated annual budget for the DPU Siting Division from 2025 to 2030. The breakdown into categories in Table 15 was derived by apportioning the DPU Siting Division's operating budget for financial year 2024 (July 2023 to June 2024), with each budget category in the total DPU operating budget apportioned for that year (an exact budget breakdown is not available).

Table 16. — Estimated DPU Siting Division expenses: 2024–2030

Budget (FY)	2024*	2025	2026	2027	2028	2029	2030
Payroll	$1,520,530	$1,566,146	$2,900,500	$2,987,5150	3,077,140	$3,169,455	$3,264,538
Payroll tax	$32,083	$25,372	$64,101	$66,024	$68,005	$70,045	$72,146
Travel	$11,218	$10.680	$35,400	$42,480	$44,604	$45,942	$47,320
Admin expenses	$24,675	$27,624	$28,453	$31,298	$32,237	$33,204	$34,200
Translation services	$60,000	$73,120	$80,000	$96,000	$100,800	$103,824	$106,939
Overhead (rent, utilities)	$196,413	$196,359	$202,015	$205,045	$208,121	$211,243	$214,411
IT expenses[89]	$94,976	$96,015	$689,531	$554,616	$275,000	$280,000	$288,400
Total	**$1,941,483**	**$1,995,315**	**$4,000,000**	**$3,982,978**	**$3,805,907**	**$3,913,713**	**$4,027,955**

With an estimated staff increase of 12 new positions in 2026, payroll is expected to increase by roughly $1.3 million that year with a 3% annual cost of living adjustment thereafter. Payroll tax increases are proportional with the FY26 proposed rate of 2.21%. As project volume is roughly expected to increase tenfold in 2025–2026, so do travel costs. Other expenses are proportionally higher with increased project volume. IT expenses are projected to see a significant increase due to more electronic equipment for new staff and improvements in project visibility and public transparency on a new dashboard format. The largest increase in IT costs will occur in FY26 and FY27 when the dashboard is under development.

[89] IT expenditures in FY26 include the development of a clean energy infrastructure dashboard. It is expected that additional development will be needed in FY27. Standard IT costs are expected to resume in FY28.

H. NEXT STEPS: ROADMAP TO A SMOOTH TRANSITION PERIOD (JANUARY 2025–JUNE 2026)

Prior to the promulgation of siting and permitting reform regulations and procedures by March 1, 2026, the DPU Siting Division is responsible for overseeing a significant number of changes to its proceedings. These tasks include:

- Establishing procedures to reviewing cumulative impact analyses
- Working with the DPU Division of Public Participation to develop protocols for non-adjudicatory community liaisons/ombudspersons to aid petitioners in meeting community engagement requirements
- Developing public-facing educational and engagement materials, including a web-based database and dashboard to track all state and possibly local permitting processes
- Managing a rulemaking process to identify and promulgate:
    - Regulations on pre-filing stakeholder engagement requirements
    - Site suitability guidelines
    - Cumulative impacts analysis
    - Application contents and process
    - Permitting process and timeline
    - Administration of the constructive approval mechanism
    - Administering funding for intervenors and/or other technical support
    - De novo adjudication of non-EFSB jurisdiction projects if requested by developers or intervenors
    - Support during appeals processes of clean energy infrastructure at the Supreme Judicial Court

Benchmarking EFSB processes against other states

Based on cursory research and brief interviews with staff working in similar offices in different states, GreenerU identified resources and contacts for DPU Siting Division staff to access during the transition period. Findings were that clean energy infrastructure siting and permitting jurisdictions varied from state to state, as shown in Table 17.

Table 17. — Clean energy infrastructure siting and permitting authorities and jurisdictions in peer states

State	Lead agency	Department or division	Jurisdiction
Massachusetts[90]	Department of Public Utilities	Siting Division	Solar ≥25 MW Wind ≥25 MW

[90] 2024 Climate Act.

State	Lead agency	Department or division	Jurisdiction
	Energy Facilities Siting Board		Anaerobic digestion ≥25 MW Storage ≥100 MWh New transmission in new right of way ≥69 kV, >1 mile New transmission in existing right of way 115 kV, ≥10 miles New transmission requiring zoning exemptions Offshore wind Facilities needed to interconnect to the grid Small clean energy infrastructure de novo adjudication
Michigan[91]	Public Service Commission	n/a	Solar ≥50 MW Wind ≥100 MW Storage ≥50 MW / ≥200 MWh
Minnesota[92]	Public Utilities Commission	n/a	Solar ≥50 MW Wind ≥5 MW Storage ≥10 MW Power plants ≥50 MW High-voltage transmission lines Hazardous liquids pipelines
New Hampshire[93]	State Evaluation Committee	n/a	Renewable energy facilities Storage ≥30 MW Transmission ≥100 kV connected to a generating facility Transmission >100 kV, >10 miles New transmission >200 kV Oil, gas, and coal generating facilities ≥30 MW

[91] State of Michigan, 102nd Legislature, Public Act No. 233, "An Act to require certain providers of electric service to establish and recover costs for renewable energy programs; to require certain providers of electric or natural gas service to establish energy waste reduction programs; to authorize the use of certain energy systems to meet the requirements of those programs; to provide for the approval of energy waste reduction service companies; to reduce energy waste by state agencies and the public; to create a wind energy resource zone board and provide for its power and duties; to authorize the creation and implementation of wind energy resource zones; to provide for expedited transmission line siting certificates; to provide for customer generation and net metering programs and the responsibilities of certain providers of electric service and customers with respect to customer generation and net metering; to provide for fees; to prescribe the powers and duties of certain state agencies and officials; to require the promulgation of rules and the issuance of orders; to authorize the establishment of residential energy improvement programs by providers of electric or natural gas service; and to provide for civil sanctions, remedies, and penalties," November 28, 2023. From https://www.legislature.mi.gov/documents/2023-2024/publicact/pdf/2023-PA-0233.pdf, accessed December 4, 2024.

[92] State of Minnesota, Public Utilities Commission, Energy Facilities Permitting. From https://mn.gov/puc/activities/energy-facilities/#:~:text=Solar%20Power-,A%20site%20permit%20issued%20by%20the%20Minnesota%20Public%20Utilities%20Commission,generating%2050%20megawatts%20or%20more, accessed December 4, 2024.

[93] State of New Hampshire, General Court, Title XII: Public Safety and Welfare, Chapter 162H, "Energy Facility Evaluation, Siting, Construction, and Operation," H-2: Definitions. From https://www.gencourt.state.nh.us/rsa/html/XII/162-H/162-H-2.htm, accessed December 4, 2024.

State	Lead agency	Department or division	Jurisdiction
New Jersey[94]	Department of Environmental Protection	Office of Permitting and Project Navigation	Multiple; non-centralized permitting process
New York[95]	Department of Public Service	Office of Renewable Energy Siting and Electric Transmission	All renewable energy projects ≥25 MW
Oregon[96]	Department of Energy Facilities & Safety	Energy Facility Siting Council	Solar ≥25 MW Wind ≥50 MW Geothermal ≥50 MW Standalone storage[97] Transmission ≥230 kV, >10 miles Natural gas, liquid fuel, liquefied natural gas storage and pipelines Biomass conversion Cumulative effects of development resulting in energy generation of ≥35 MW Radioactive waste disposal
Rhode Island[98]	Public Utilities Commission	Energy Facility Siting Board	Electricity generation ≥40 MW Hydroelectric power ≥10 MW Transmission line ≥69 kV Coal Liquefied natural or petroleum gas Nuclear Oil/gas/petroleum

Changes to the EFSB's jurisdiction and procedures within the 2024 Climate Act most closely model New York's Office of Renewable Energy Siting and Electric Transmission (ORES) in terms of a consolidated permitting process and strict statutory timelines (completeness determination and final decision). Discussions with ORES personnel revealed that since such deadlines are limiting staff availability for review, they are working to develop solutions such as:[99]

- Providing more guidance to applicants through one-on-one meetings

[94] State of New Jersey, Department of Environmental Protection, Office of Permitting and Project Navigation. From https://dep.nj.gov/oppn/, accessed December 4, 2024.
[95] State of New York, Department of Public Service, Office of Renewable Energy Siting and Electric Transmission. From https://dps.ny.gov/ores, accessed December 4, 2024.
[96] State of Oregon, Department of Energy, Facilities & Safety, Energy Facility Siting Council Jurisdiction. From https://www.oregon.gov/energy/facilities-safety/facilities/Pages/Council-Jurisdiction.aspx, accessed December 4, 2024.
[97] State of Oregon, 82nd Oregon Legislative Assembly, 2024 Regular Session, House Bill 4015, "Related to battery energy storage systems," signed into law March 27, 2024, and enacted June 2024. From https://olis.oregonlegislature.gov/liz/2024R1/Downloads/MeasureDocument/HB4015/Enrolled, accessed December 4, 2024.
[98] State of Rhode Island, Public Utilities Commission, Energy Facility Siting Board, "445 RICR-00-00-1 Rules of Practice and Procedure," effective November 8, 2018. From https://ripuc.ri.gov/sites/g/files/xkgbur841/files/efsb/EFSB2/SB2018_05_Rule_Practice.pdf, accessed December 4, 2024.
[99] Interview with Sarah Crowell, AICP, Chief of Renewable Energy Siting, Office of Renewable Energy Siting and Electric Transmission, New York Department of Public Service, October 7, 2024.

- Clarifying application requirements
- Instituting a pre-application process to address environmental issues ahead of time
- Streamlining the overall process

Also helpful to consider may be the recently released "Application Filing Instructions and Procedures" for renewable energy permit application procedures from the State of Michigan's Public Service Commission (MPSC) dated October 10, 2024.[100] In this document, MSPC offers a procedural flowchart, pre-application guidance, an application fee schedule, and detailed application filing requirements.

GreenerU recommends that the DPU Siting Division consider performing a deeper analysis of lessons learned from peer state processes during the current transition phase.

The DPU Siting Division transition plan

Throughout 2025 and into 2026, in addition to an increased anticipated number of case filings, the DPU Siting Division staff will be responsible for implementing a set of tasks to prepare for the transition to accommodate new jurisdiction. Table 18 outlines this plan.

Table 18. — DPU Siting Division transition plan

Task	Lead/help	Deadline	Task breakdown
Assess staffing and capacity needs	DPU Siting Division Director with consultant	Jan 2025	• Perform baseline assessment of staff capacity and responsibilities • Develop recommendations to maximize efficiency and improve recruiting and hiring • Develop a transition plan task breakdown • Develop estimates of future DPU Siting Division workload • Establish recommendations for staffing needs under EFSB 2.0 • Pursue additional head count approval • Post and hire additional staff
Establish interim process for review of battery energy storage systems	DPU Siting Division General Counsel	Feb 2025	• Use the current certificate process regulations until July 1, 2026 and develop transition guidance
Move DPU zoning exemptions proceedings to EFSB	DPU Siting General Counsel	Feb 2025	• Transfer existing proceedings - DPU Order and Presiding Officer procedural orders • Issue filing guidance for zoning exemptions

[100] See https://www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/workgroups/2023-Energy-Legislation/Renewable-Energy-and-Energy-Storage-Siting/Application-Filing-Instructions-and-Procedures-10-10-24.pdf?rev=d2b8f54846084ceb82676f132c4d3aff&hash=E55042B9F34D161389400125E8F8609A

Task	Lead/help	Deadline	Task breakdown
Determine draft filing fees *	DPU Siting Division Director with DPU	July 2025	• Identify financial needs (what is enough to cover the cost of cases) • Establish filing fees for different types of applicants
Establish draft standard application for a consolidated permit	DPU Siting Management	July 2025	• Define legal requirements • Determine filing requirements • Determine reasonable completeness determination • Determine "universe" of permits that can apply to projects by type • Identify entities responsible for compliance and enforcement of permit conditions
Develop draft prefiling requirements *	DPU Siting Division General Counsel w/ EEA OEJE and DPU Division of Public Participation	July 2025	• Develop requirement for notice • Develop standards for outreach requirements • Develop public comment requirement • Develop standards for community benefits plans (CBPs)
Develop draft protocols for local permitting interfacing	DPU Siting Division Management with DOER	July 2025	• Discuss with Massachusetts Municipal Association

Draft regulations to implement statutory requirements for a consolidated EFSB 2.0 process *	DPU Siting Division General Counsel and Management	July 2025	• Create a regulatory framework (general idea of what we'll put in what reg)
			• Propose amendments to 980 CMR 1.0 (procedural rules):
			  ○ Change procedural sections
			  ○ Revise definition of facility
			  ○ Add new definitions
			  ○ Include pre-filing requirements (see above)
			  ○ Include cumulative impact analysis/assessment requirements (see above)
			  ○ Include guidelines on intervenor criteria and funding
			  ○ Develop new statutory standard of review from legislative mandate
			  ○ Develop standard for completeness determination
			  ○ Determine distances required for notice to abutters
			  ○ Include information about how decisions are made about virtual, hybrid, or in-person hearings
			• Propose amendments to 980 CMR 2.0
			  ○ Update responsibilities of DPU Siting Division Director

Task	Lead/help	Deadline	Task breakdown
			○ Establish new makeup of the EFSB ○ Add new statutory mandate into regulations • Draft proposed new regulations sections ○ Develop new sections implementing § 69T, § 69U, § 69V, § 69W • Propose to delete unused regs (980 CMR 4.00, 5.00, 7.00, 8.00, 9.00, 11.00) •
Develop draft standard permit condition for each type of permit	DPU Siting Division Management with multi-agency input	July 2025	• Identify universe of permits • Research current conditions applied by EFSB; current conditions applied by other agencies • Obtain statements of recommended permit conditions from other agencies (format/content) • Ensure MEPA conditions are considered
Launch campaign to recruit, hire, and train new staff	DPU Siting Division Management	Aug 2025[101]	• Write updated job descriptions • Post and recruit • Interview and hire • Set up new training framework
Develop draft regulations for cumulative impact analysis *	DPU Siting Division Management w/ EEA OEJE guidance	Aug 2025	• Participate in EEA stakeholder process • EFSB to promulgate regs after EEA OEJE issues guidance
Develop draft protocols for state permitting interfacing	DPU Siting Division Director with EEA Undersecretary of Energy	Aug 2025	• Include interagency task force
Communicate final changes to the public	DPU Siting Division	Mar 2026	• Identify audiences • Develop key messages per audience • Identify communication venues • Identify communications partners • Send communications • Solicit feedback
Launch EFSB process to review local permits *	DPU Siting Division General Counsel with DOER	Mar 2026	• Identify factors triggering this review • Include standards for review • Define record (incorporate info from municipality) • Develop new section implementing § 69W • Determine what local adjudications would look like, including what an application submission portal might look like
Develop proposed timeline(s) for EFSB	DPU Siting Division Management	Mar 2026	• Identify stages of the proposal review process

[101] Hiring activities for the DPU Siting Division are currently subject to the provisions of an Executive Branch hiring freeze announced by Governor Healey on May 14, 2025.

Task	Lead/help	Deadline	Task breakdown
2.0 consolidated permitting processes			• Determine logistics of each stage of the process • Identify action items for each stage and parties responsible • Determine maximum length of each stage • Identify contingencies, possible snags, and solutions to keep the process moving on time
Apply site suitability criteria	DPU Siting Division Management with guidance from EEA	Mar 2026	• Develop final regulations with standards to apply site suitability criteria (DPU Siting Division) •
Develop criteria and funding for intervenors	DPU DPP with DPU Siting Division Management	Mar 2026	• Establish criteria for grants • Determine amounts and recipients • Promulgate regulations (DPU)
Modernize website	DPU Siting Division Director and Assistant Director with IT	Mar 2026	• Contemplate work product at high level: (i.e., what information we are collecting; can it be an easily used portal; can users upload documents; does the new DPU file room have the capability) • Come up with information that we could publish in the interim • Identify IT resources needed • Establish clean energy infrastructure dashboard – work with IT to create, maintain and update a dashboard (required data listed) • Upgrade file room • Update webpage • Capture local permitting information

* Tasks requiring a rulemaking process

Additional tasks are the responsibilities of other state agencies, such as the development of regulation and guidance for pre-filing standards and conditions. Table 19 details such responsibilities.

Table 19. — Regulations and guidance responsibilities of other agencies

Task	Lead
Establish guidance on cumulative impact analysis	EEA OEJE
Establish standards, requirements, and procedures for siting and permitting of small clean energy infrastructure for the local permitting process	DOER
Develop a methodology for determining site suitability for clean energy facilities	EEA
Create statewide guidance for community benefits plans and agreements (CBAs)	EEA OEJE
Set EFSB filing fees pursuant to revised § 69J½	DPU

This report was researched and prepared by GreenerU in cooperation with the DPU Siting Division staff, including Andrew Greene, Joan Foster Evans, and Wayne Wang. Questions about this report can be directed to Jennifer Haugh at jennifer.h@greeneru.com.

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