



GWSA Implementation Advisory Committee (IAC) Meeting

Executive Office of Energy & Environmental Affairs

September 25th, 2025

Agenda



1. Welcome

- Review of Meeting Minutes

2. Energy Siting and Permitting Reforms

3. 2035 Clean Energy & Climate Plan (CECP) Kickoff

4. IAC Work Group Updates

5. Public Comments



Commonwealth of Massachusetts
Executive Office of
Energy and Environmental Affairs

Siting and Permitting Reforms for Energy Infrastructure

Overview of Draft Regulations and Guidance

GWSA IAC Meeting
September 25, 2025





Commission on Energy Infrastructure Siting and Permitting

- Commission was established by [Executive Order 620](#)
- Required to advise the Governor on:
 1. **accelerating the responsible deployment of clean energy infrastructure through siting and permitting reform** in a manner consistent with applicable legal requirements and the Clean Energy and Climate Plan;
 2. **facilitating community input** into the siting and permitting of clean energy infrastructure; and
 3. **ensuring that the benefits of the clean energy transition are shared equitably** among all residents of the Commonwealth.
- Two public listening sessions held and over 1,500 public comments received.
- Recommendations sent to Governor Healey on March 29, 2024.
- The Commission's recommendations were largely passed into law through *An Act promoting a clean energy grid, advancing equity, and protecting ratepayers* (2024 Climate Act), signed by Governor Healey in November 2024.

Consolidated State Permitting

- All state, regional, and local permits for Large Clean Energy Infrastructure Facilities combined into **one consolidated permit** issued by the EFSB.
- All state and local agencies that would otherwise have a permitting role are able to **automatically intervene and participate** by issuing statements of recommended permit conditions.
- All projects must submit cumulative impact analysis as part of application to Energy Facilities Siting Board (EFSB).
- Permit decision must be issued in **less than 15 months** from determination of application completeness.
- EFSB decisions can be appealed directly to the Supreme Judicial Court.



- Applies to generation facilities >25 MW, storage facilities >100 MWh, offshore wind related infrastructure, and large new transmission projects

Consolidated Local Permitting

- Local governments (municipalities and regional commissions such as the Cape Cod and Martha's Vineyard Commissions) **retain all permitting powers for projects not subject to review by the EFSB.**
- Local governments **may continue to run separate approval processes** concurrently (e.g., wetlands, zoning, etc.) but are required to **issue a single permit** that includes individual approvals for clean energy infrastructure.
- Permit decision must be issued in **within 12 months.**
- Local governments can refer permitting review directly to the EFSB if they do not have sufficient resources.
- Permit applications can also be reviewed by EFSB following a local government's final decision if a review is requested by parties that can demonstrate they are substantially and specifically impacted by the decision, then further appealed directly to the Supreme Judicial Court.
- Department of Energy Resources (DOER) is responsible for **creating a standard municipal permit application and a uniform set of baseline health, safety, and environmental standards** to be used by local decision makers when permitting clean energy infrastructure.



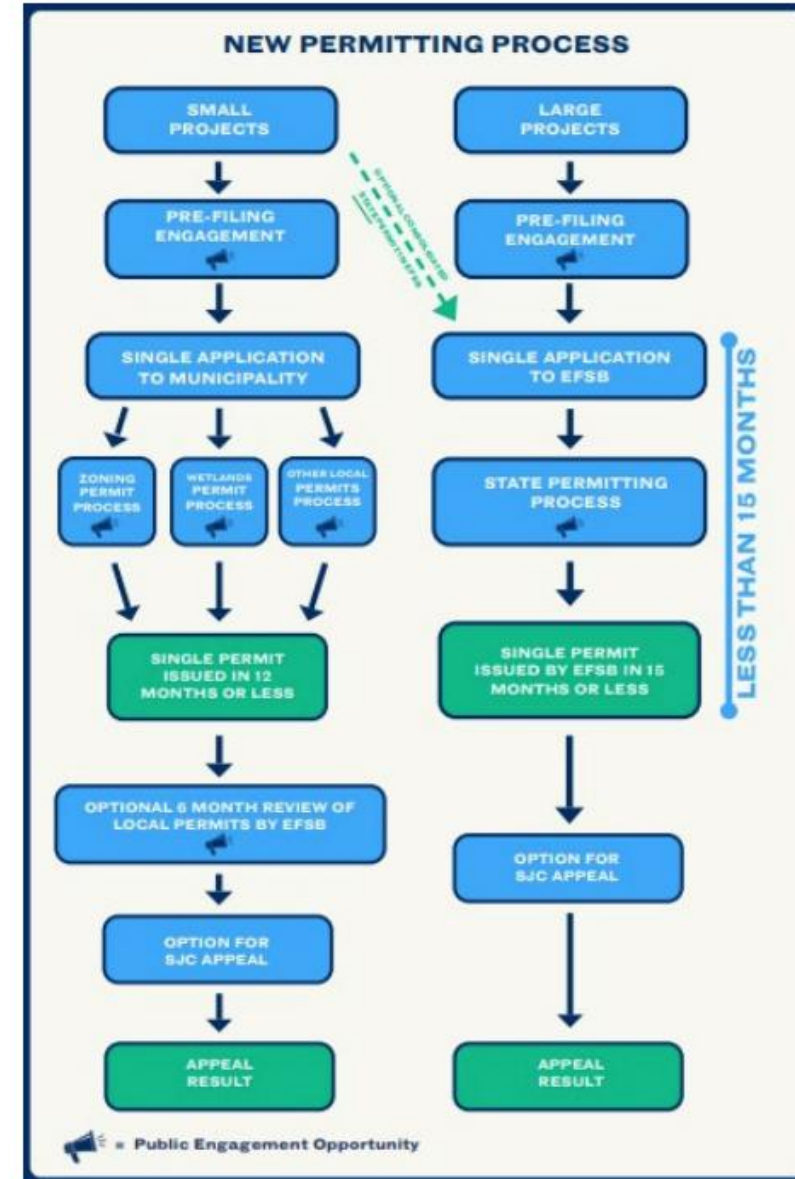
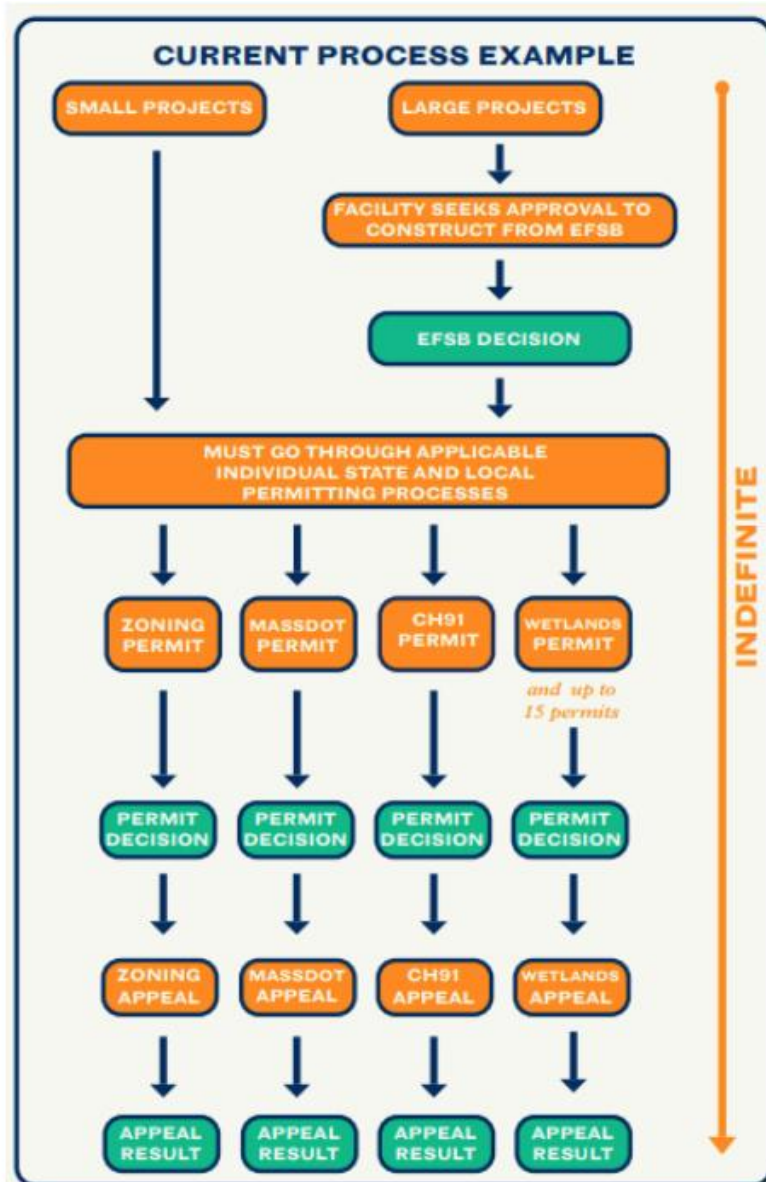
- Applies to generation facilities <25 MW, storage facilities <100 MWh, and non-EFSB jurisdictional transmission and distribution projects



More Meaningful & Just Community Engagement

- Formal establishment of the Office of Environmental Justice and Equity in statute, with a specific mandate to develop guidance regarding community benefits agreement and cumulative impact analyses.
- First-ever mandatory community engagement requirements, including documentation of efforts to involve community organizations and demonstration of efforts to develop community benefit agreements.
- New Division of Public Participation at DPU to assist communities and project applicants with engagement and process questions in DPU and EFSB proceedings.
- New Division of Siting and Permitting at DOER to assist communities and project applicants with engagement and process questions in local permitting.
- Intervenor financial support is available to under-resourced organizations that wish to participate in an EFSB proceeding and are granted intervenor status. Municipalities with a population of 7,500 or less are automatically eligible for financial support.

Process Reforms





Roles and Responsibilities

- There are five workstreams that stem from the bill that are being administered by three different agencies: EEA, DPU, and DOER.
- All three agencies are in close communication with each other, and other state agencies that have significant energy permitting roles have also been consulted as proposals are being developed.
- Regulations are required to be promulgated by March 1, 2026.
- In Spring 2025, the agencies held stakeholder sessions to provide information to the public on implementation, receive comments, and take questions on numerous straw proposals. More information is available on the [2024 Climate Act Stakeholder Sessions webpage](#).





Energy Facilities Siting Board and Department of Public Utilities Regulations



Proposed Regulations

Draft Regulation	Topic	Summary
980 CMR 1.00 – EFSB revised	Adjudicatory Proceedings	Adds new requirements from the Act and codifies certain existing practices
980 CMR 2.00 – EFSB revised	Board Procedures	Adds new requirements from Act, including: <ul style="list-style-type: none">• Revises the Board’s mandate and scope of review• Exempts EFSB-jurisdictional facilities from Massachusetts Environmental Policy Act (MEPA) review• Revises Board membership• Requires an online dashboard of progress reviewing and deciding on cases
980 CMR 16.00 – EFSB new	Pre-filing Consultation and Engagement	Sets requirements for pre-filing engagement, including: <ul style="list-style-type: none">• Pre-filing consultations with permitting agencies and the MEPA Office• Public meetings and other forms of outreach with community• Documentation that these requirements have been met



Proposed Regulations

Draft Regulation	Topic	Summary
980 CMR 13.00 – EFSB new	Consolidated Permit Applications	Establishes consolidated permit requirements and procedures, including: <ul style="list-style-type: none">• Standard conditions for all consolidated permits, and supplemental conditions that could be applied• Application requirements• Completeness determination processes• Permit enforcement procedures for the permit agency that would have otherwise issued the permit
980 CMR 14.00 – EFSB new	De Novo Adjudication	Establishes process for de novo adjudications: <ul style="list-style-type: none">• De novo adjudication occurs when<ul style="list-style-type: none">(1) there is a request for the Director to take a fresh look at a decision by a local government on a consolidated local permit; or(2) when a local government lacks resources to review an application for a consolidated local permit within 12 months• EFSB Director to make decisions on de novo adjudications based on consistency with 225 CMR 29.00 and G.L. c. 164, § 69H.



Proposed Regulations

Draft Regulation	Topic	Summary
980 CMR 17.00 – EFSB new	Constructive Approval	Establishes procedures for issuing constructive approvals when the Board fails to issue a final decision within its review timeframe, including processes and permit conditions
220 CMR 34.00 – DPU new	Intervenor Support Grant Program	Establishes processes for a program that would provide financial assistance to eligible organizations, community groups, and governments who are unable to participate in proceedings before the DPU and EFSB because of financial hardship or lack of procedural knowledge.

Important Dates



Milestone	Dates
Siting Board Meeting on Opening Rulemaking	September 8, 2025
Proposed Regulations Filed	September 12, 2025
Initial Deadline for Written Comments	October 17, 2025
Public Comment Hearings	October 27 – November 5, 2025
Final Deadline for Written Comments	November 7, 2025
Deadline for Promulgation	March 1, 2026



Regulations Governing Consolidated Local Permitting

Regulations Governing Local Permitting

- The 2024 Climate Act created a new Division of Clean Energy Siting & Permitting at DOER to develop regulations streamlining the permitting of small clean energy infrastructure projects and provide technical support and assistance to municipalities, project proponents, and other stakeholders.
- DOER filed issued proposed regulations ([225 CMR 29.00](#)) on September 12, 2025 that establish pre-filing requirements, a universal application, site suitability scoring and mitigation expectations, and new permitting processes.





Regulations Governing Local Permitting

- **Pre-Filing Outreach**
 - Includes requirements for pre-filing outreach to municipality and local stakeholders

- **Common Application**
 - Includes a common application that will be used in every municipality for consolidated local permits.
 - DOER/EFSB will build a new online permitting portal for large and small projects.

- **Environmental, Health, Safety Standards**
 - Will establish universal baseline standards around how projects should be designed to protect public health, safety, and local environment. Will touch on setbacks, electrical, stormwater management, lighting, emergency
 - Munis will be able to go above and beyond if they can show a need to protect the public health, safety, and environment.



Regulations Governing Local Permitting

■ Permitting

- Requires applicants to respond to questions, provide new plans within certain timeframes
- DOER to create a Circuit Rider program to assist applicants and municipalities with understanding new regulations and resolve disputes between parties to prevent delays and appeals

■ Siting and Mitigation

- Includes provisions for using site suitability assessments in permitting
- Ties mitigation to Site Suitability scoring. Requires applicant to avoid, minimize, or mitigate negative impacts and propose projects to offset weak criteria scores.
- DOER is creating new model bylaws for solar, battery storage, canopy that will encourage municipalities to consult Site Suitability models to create new "by-right" zoning.

■ Common Conditions

- Establishes a set of common conditions for cases where an application receives constructive approval. Will be aligned with EFSB common conditions.

Important Dates



Milestone	Dates
Draft regulations filed	September 12, 2025
Informational Sessions	October 6 – 9, 2025
Public Comment Hearing	October 15, 2025
Deadline for Written Comments	October 17, 2025
Deadline for Promulgation	March 1, 2026



EEA Guidance

Site Suitability Assessments



- As required by the Act, EEA released guidance including a methodology for determining the suitability of sites for applicable energy infrastructure and recommendations for using the methodology in the review of applications for consolidated permits by the EFSB and local governments.
- Clean Energy Infrastructure Facilities applying to the EFSB or municipalities for consolidated permits will be required to complete the Site Suitability Assessment, with certain exceptions.
- Applicants should use the scoring framework to estimate their project's scores before submitting their permit application. This allows the methodology to work as a pre-filing screening tool that discourages developers from submitting applications for sites with poor scores.
- These scores will be taken into consideration by permitting authorities, and impact the types and level of minimization or environmental mitigation measures needed to be issued a permit.



Criteria-Specific Suitability Scores

Criteria	Scoring Method Summary	Possible Points
Climate Resilience	Highest exposure ratings for (1) riverine flooding and (2) coastal flooding hazards	0 to 5
Carbon Storage and Sequestration	Total ecosystem carbon storage, plus 50-year sequestration potential.	0 to 5
Biodiversity	Overlap with specific Biomap elements and NHESP Priority Habitat, as well as ecological integrity value	0 to 5
Agricultural Resources	Overlap with areas designated as: (i) Prime Farmland; (ii) Farmland of Statewide Importance; and (iii) Farmland of Unique Importance, with greater weight given to areas under active agricultural use.	0 to 5
All	Total:	0 to 20

Lower suitability scores (0-2) = more suitable, lower impact/exposure locations; expect few, modest minimization/mitigation measures
Higher suitability scores (4-5) = less suitable, higher impact/exposure locations; expect more, substantial minimization/mitigation measures



Score Modifiers

Site Suitability Criteria	Data Source	Scoring Method
Development potential	Pre-determination letters obtained from DOER (for Solar Canopies, Brownfields, Eligible Landfills, and Previously Developed Lands only)	<p><u>Automatic Total Site Suitability Score of 20</u>: Located in Protected Open Space</p> <p><u>2.5-point subtraction</u>: Located in a CIP investment area</p> <p><u>5-point subtraction</u>: Solar Canopies or Applicable Facilities located on a Brownfield, Eligible Landfill, or Previously Developed Lands</p>
Social and environmental burdens	MassEnviroScreen	If any portion of the Site Footprint of a Facility seeking a Consolidated Local Permit is located in a Burdened Area, and certain Total or Criteria-Specific scores, the Applicant will be required to provide an analysis demonstrating how the facility will and will not add to any existing burdens in the area.
Social and environmental benefits	Signed agreements between host municipality and Applicable Facility	Projects can subtract one (1) point from their score for providing certain social and environmental benefits, if agreed to by the host municipality.



Recommendations for Use by EFSB

- Projects that are located in a Burdened Area and thus required to complete a Cumulative Impact Analysis will not be required to complete a Site Suitability Assessment.
- The EFSB should incorporate the elements of the site suitability criteria (e.g., carbon sequestration, habitat, etc.) in its CIA and Route and Site Scoring analyses as feasible.
- The EFSB is recommended to consider the Total Site Suitability Score in its decisions alongside other aspects of the project.
- The Total Site Suitability Score should be considered in the context of the project's design plan and planned mitigation measures.
- The EFSB should use the criteria-specific suitability scores as a resource to determine if minimization or environmental mitigation measures should be required for a project to receive a consolidated permit.



Recommendations for Use by Local Governments

- Municipalities are recommended to consider a project’s Total Site Suitability Score and Criteria-Specific Suitability Scores when determining permit conditions.
- Sites with a Total Site Suitability Score below a certain level should be assumed to be highly suitable and require minimal to no mitigation, regardless of Criteria-Specific Suitability Scores.
- Municipalities should use the criteria-specific suitability scores as a resource to determine if minimization or environmental mitigation measures should be required for a project to receive a Consolidated Local Permit.
- The level and type of mitigation measures required should be based on the Criteria-Specific Site Suitability score. Requirements should be relevant to the category in which the score was assessed.

Criteria Score Range	Suitability (for specific criteria)	Interpretation (for specific criteria)
1 or less	Highly suitable, minimal impact	No minimization or mitigation measures required
1 to 2	Suitable, low impact	Modest minimization and/or mitigation measures may be required
2 to 3	Moderately suitable, moderate impacts	Minimization and/or mitigation measures likely required
3 to 4	Not very suitable, moderate to high impact	Significant minimization and/or mitigation measures likely required
4 to 5	Unsuitable, high impact	If permitted, will generally require extensive minimization and/or mitigation

Standards and Guidelines for Community Benefits Plans and Agreements



- The Office of Environmental Justice and Equity (OEJE) has developed [standards and guidelines](#) governing the potential use and applicability of Community Benefit Plans (CBPs) and Community Benefit Agreements (CBAs).
- The draft guidelines outline best practices to ensure CBPs and CBAs provide meaningful, measurable benefits to communities hosting energy infrastructure, including:
 - A step-by-step process for effective engagement with a community
 - How to design commitments that are specific, measurable, and accountable
 - Examples of meaningful commitments
 - Recommended template for CBPs
 - Clear accountability mechanisms



Siting and Permitting Public Engagement Calendar

OCT/NOV 2025

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
28	29	30	1	2	3	4
5	6 EEA Webinar on Guidance DOER Info Session (Bourne)	7 DOER Info Session (Danvers)	8 DOER Info Session (Fitchburg)	9 DOER Info Session (Amherst) EEA Webinar on Site Suitability and CBA Guidance	10	11
12	13	14	15 DOER Public Hearing (Virtual)	16	17 DOER Written Comments Deadline	18
19	20	21	22	23	24 EEA Written Comments Deadline	25
26	27 EFSB/DPU Public Hearing (New Bedford)	28	29 EFSB/DPU Public Hearing (Pittsfield)	30	31	1
2	3 EFSB/DPU Public Hearing (Boston)	4	5 EFSB/DPU Public Hearing (Lynn)	6	7 EFSB and DPU Written Comments Deadline	8



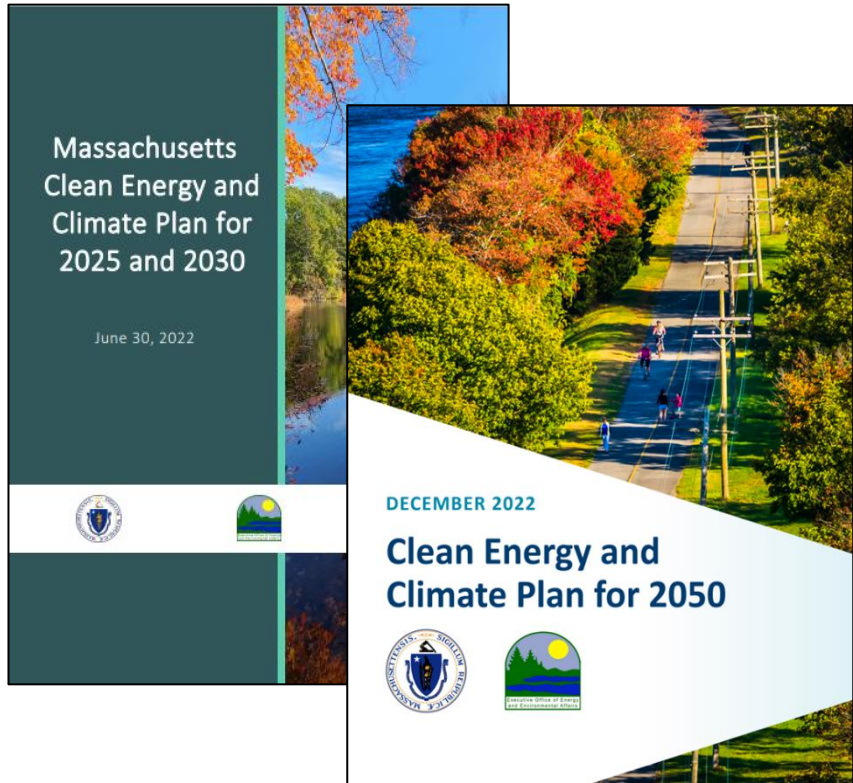
Thank You

- Information on the regulations, process and public engagement opportunities can be found at: www.mass.gov/energypermitting
- Questions can be directed to energypermitting@mass.gov



2035 Clean Energy & Climate Plan (CECP) Kickoff

Why We Publish the Clean Energy & Climate Plan (CECP)

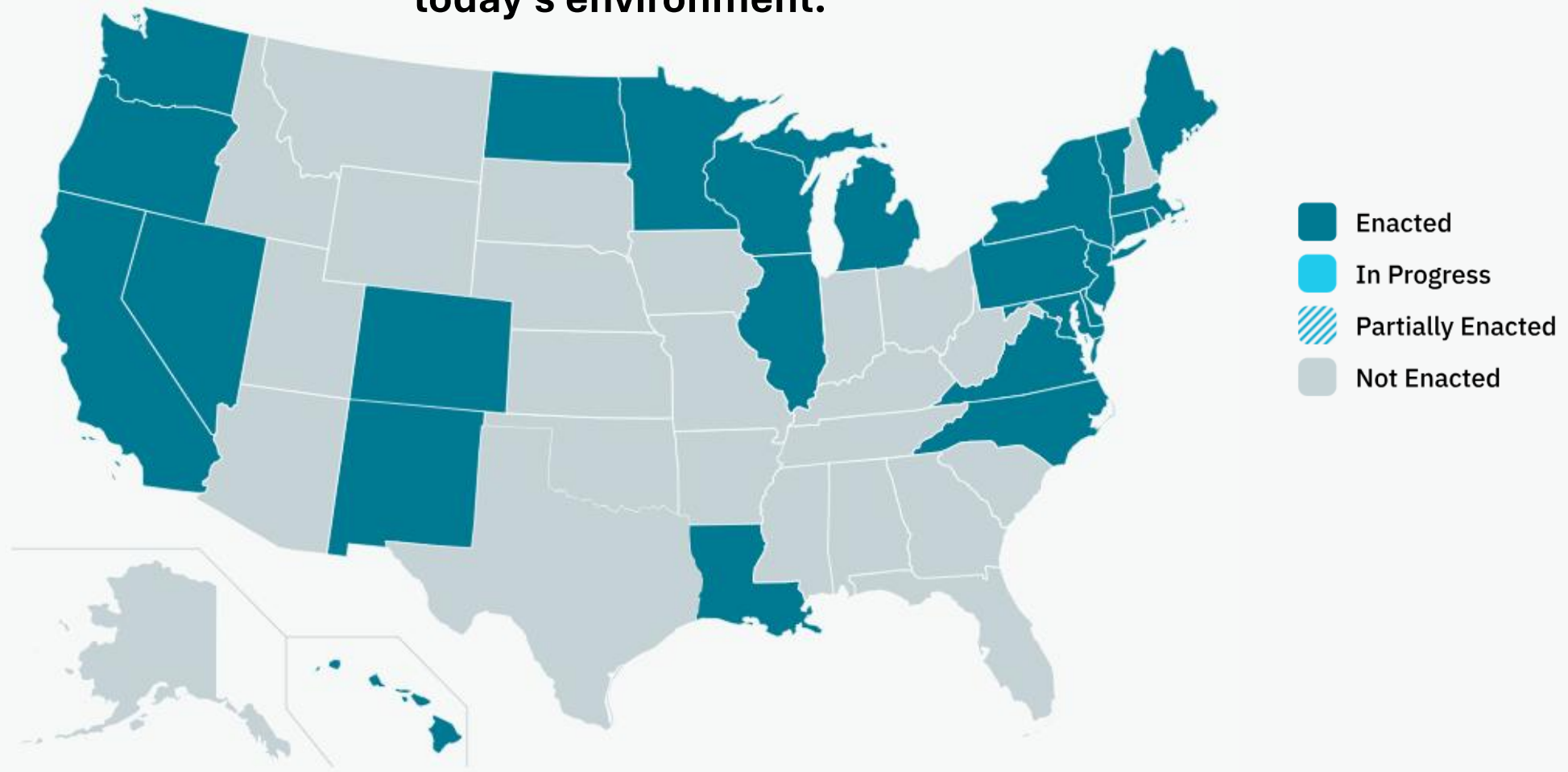


- 1. Required by Law:** In addition to setting statewide greenhouse gas (GHG) emissions limits, “each limit shall be accompanied by publication of a comprehensive, clear and specific roadmap plan to realize said limit.” (*Section 8b, 2021 Climate Law*)
 - EEA must set a 2035 GHG emission limit and sublimits and publish the 2035 CECP by January 1st, 2028.
- 2. Ensures Ongoing Climate Relevance:** 5-year plans create opportunity to update climate planning to align with emerging priorities & conditions



State Leadership is Essential

We continue to talk with peers undergoing the same task of developing state climate plans in today's environment.



Source: *Climate Policy Dashboard* highlighting states with near- and long-term GHG emissions reduction targets and sectoral policy actions as of 9/16/25

CECP Requirements

At a high level, these plans must:



Address the pathway to meeting sublimits for electric power, transportation, commercial and industrial heating and cooling, residential heating and cooling, industrial processes, and natural gas distribution and service.



Consider equity; costs; benefits (including societal benefits); interaction with air quality standards; administrative burden; relative contribution of each source or category of sources to statewide emissions of greenhouse gases; and whether greenhouse gas emissions reductions achieved are real, permanent, quantifiable, verifiable, and enforceable



Set technological adoption benchmarks



Summarize Commonwealth efforts to improve/mitigate economic, environmental and public health impacts on low- or moderate-income individuals and EJ populations



Measure carbon flux of, adopt sequestration goals for, and develop action plans for natural and working lands

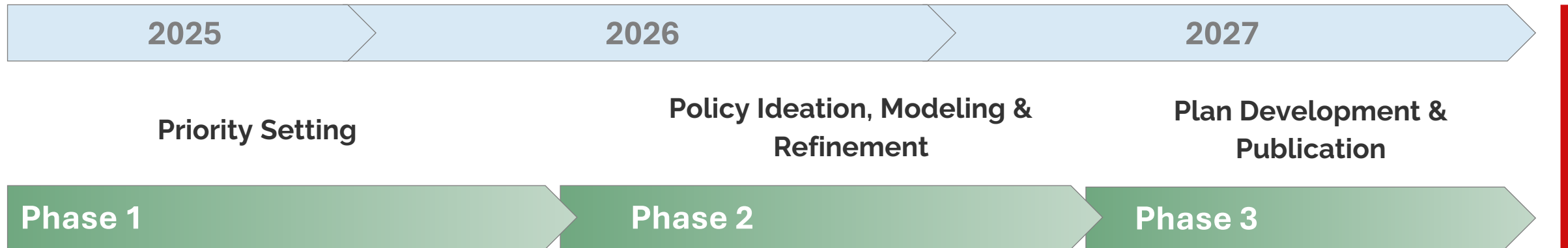


Include the results of quantitative modeling and analysis of the commonwealth's energy economy and GHG emissions in their state and regional context, publishing those results where feasible



2035 CECP Development Will Span Three Main Phases

CECP
Due date
1/1/28

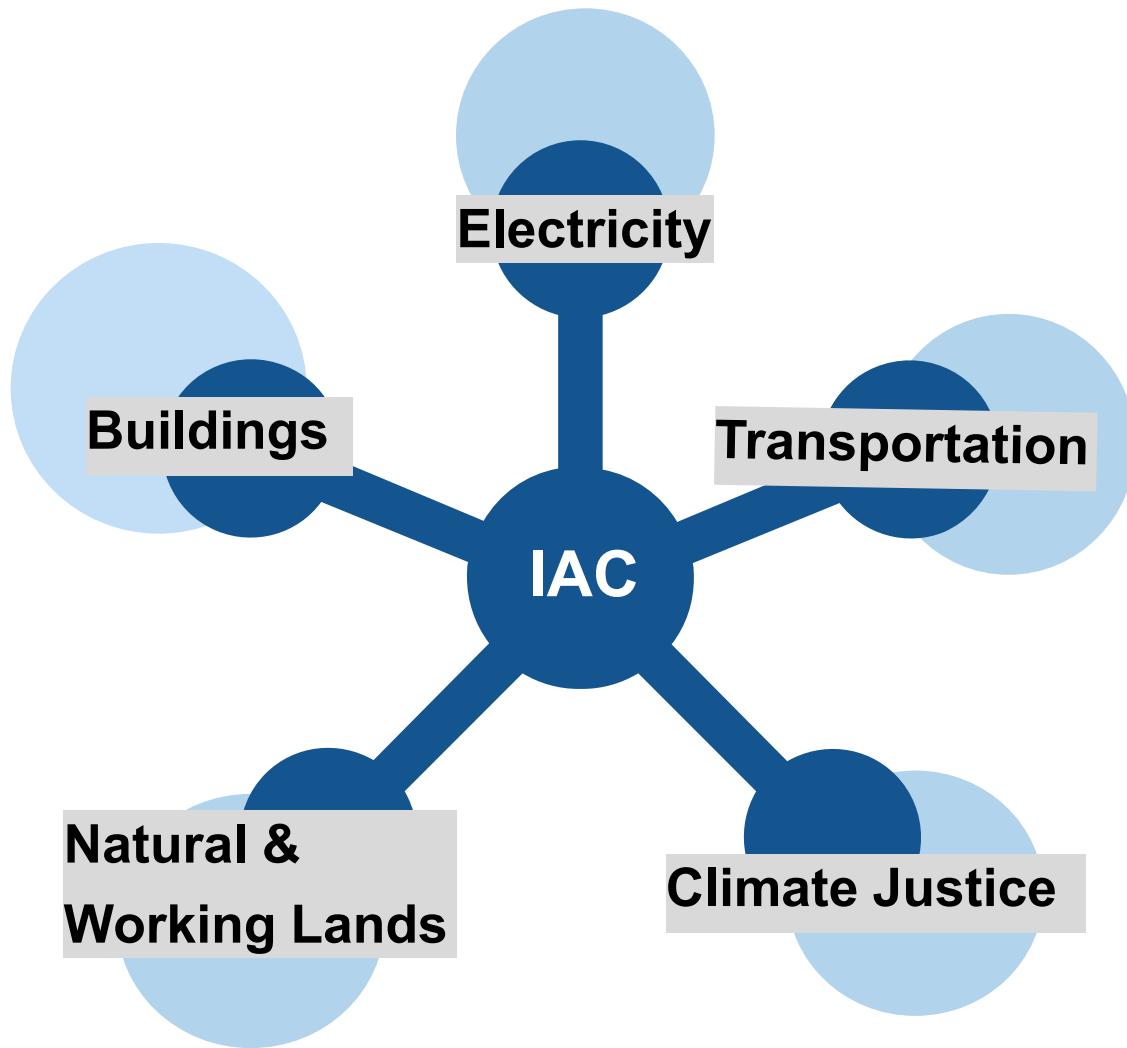


- Setting this plan's principles & context
- Refining modeling methodology
- Refining the decision-making criteria used to choose optimal pathways
- Identifying key uncertainties that will arise over plan implementation period

- Modeling pathways and identifying priority actions based on principles

- Converting pathway into a plan (assigning roles, resources, etc)

Approach to Working With IAC



- Utilize the IAC and associated work groups (WG) to develop a productive space to discuss the challenges and opportunities of the CECP.
- In consultation with the WG Chairs, increase sector work group members to expand voices and perspectives.
- In addition to providing feedback, WG members will act as conduits to their community's and networks to develop a CECP that is responsive to a variety of decarbonization needs across the state.
- Beginning this winter, with increased administrative support from climate team staff, WGs will be asked to meet every other month through 2026, with a reduced cadence in 2027.



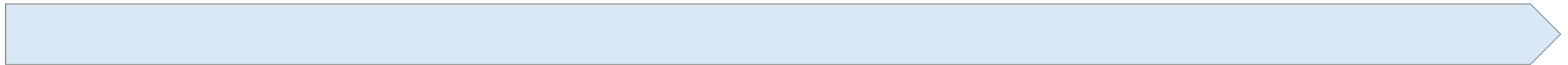
Next Steps

The Coming Months

TODAY

EARLY WINTER (2025)

LATE WINTER (2026)



- **Full IAC CECP Overview**
- **In-person kickoff meeting**
- **Develop principles & values we want to see in the CECP**
- **Develop new WG member suggestions**
- **Begin alternate month WG meetings**



IAC Work Group Updates

- **Natural & Working Lands**
- **Buildings**
- **Transportation**
- **Electricity**
- **Climate Justice**



Public Comments