

March 9, 2021

VIA ELECTRONIC MAIL

Ms. Tori Kim, MEPA Director
Executive Office of Energy and Environmental Affairs
Commonwealth of Massachusetts
MEPA-regs@mass.gov

Re: Interim Protocol on Climate Change Adaptation and Resiliency and Interim Protocol for Environmental Justice Outreach

Dear Ms. Kim:

On behalf of New England Power Company, Massachusetts Electric Company, Nantucket Electric Company and Boston Gas Company (collectively referred to as “National Grid”), thank you for the opportunity to comment on the Interim Protocol on Climate Change Adaptation and Resiliency and the Interim Protocol for Environmental Justice Outreach. National Grid supports these important efforts by the Commonwealth to address critical environmental and social justice issues. They are consistent with National Grid’s efforts to assess and address the risks posed by flooding, severe weather and other climate change impacts on critical public utility facilities. They also align with our goals as a company to address systemic racism and bias in its many forms, including the disproportionate impacts shouldered by environmental justice populations.

National Grid generally supports the requirements of both Interim Protocols. They require reasonable, clear and attainable information that will be useful to both project proponents and the regulatory community as we all work to ensure that climate change adaption and resiliency measures and environmental justice concerns are considered as projects are developed and permitted.

There are two areas where clarification of the requirements in the Interim Protocol on Climate Change Adaptation and Resiliency would aid project proponents like National Grid:

- In Section III.A, please clarify that the MEPA Office is looking for a narrative explanation of the adaptation measures that have been included in the design of the project and that the MEPA Office is not seeking project plans, engineering documents or other detailed specifications.
- In Section III.B, please clarify that critical infrastructure projects that must be located within or near the footprint of existing facilities/rights-of-way in order to provide reliable and efficient services to the public will not have reasonable alternative locations.

With respect to the Interim Protocol for Environmental Justice Outreach, National Grid requests that the MEPA Office require an expression of interest before requiring the translation of technical appendices and other large format documents. National Grid supports providing translation services for notices and community meetings. However, the more voluminous documents and technical appendices could be expensive to translate into several languages and those costs would be passed on to National Grid’s customers. We suggest that, prior to requiring translation of these documents, interested members of the community participating in the review must request their translation, which is consistent with the approach currently used by the EFSB.

Thank you again for the opportunity to review and comment on the Interim Protocols. We look forward to working with the MEPA Office as you continue your work to develop final policies and to update the MEPA regulations. If you have any questions, please do not hesitate to call me (978-732-3051) or Wendy Levine (617-594-5210).

Very truly yours,

A handwritten signature in blue ink, appearing to read "Andrea Desilets Agostino". The signature is fluid and cursive, with several peaks and valleys. It is centered horizontally within a light gray rectangular background.

Andrea Desilets Agostino
Manager

CC: Wendy B. Levine, Esq., National Grid
Lauren Peloquin Shea, Esq., National Grid
Joseph Callanan, National Grid