nationalgrid

September 26, 2024

VIA EMAIL

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

Re: National Grid Comments on MEPA Straw Proposals

Dear Ms. Kim:

On behalf of National Grid, thank you for the opportunity to provide comments on straw proposals by the MEPA Office to update the *2010 MEPA Greenhouse Gas Emissions Policy and Protocol* (the "GHG Emissions Policy") and the *2021 MEPA Interim Protocol on Climate Change Adaptation and Resiliency* (the "Climate Change and Adaptation Protocol"). National Grid provides energy to millions of customers in Massachusetts through a complex web of state-wide infrastructure, maintaining and operating over 2,700 miles of electric transmission lines, in addition to electric distribution and gas facilities. National Grid is committed to working proactively to do our part to reduce greenhouse gas (GHG) emissions and help the Commonwealth meet its decarbonization goals. Our biggest contribution to reducing GHG emissions, both across society and in terms of our own emissions, is what we do to enable the transmission and distribution of clean energy into homes and businesses. Beyond this, we are committed to reducing our own Scope 1, 2 and 3 GHG emissions and have set a pathway to achieve our science-based climate targets. National Grid has set a corporate long-term goal of achieving net zero greenhouse gas emissions by 2050 and we are actively developing the strategies to achieve this goal. We also understand that the next ten years are critical for meeting the global climate change challenge, and as a company we are acting with a shared sense of urgency.

In 2023, our revised near-term GHG emissions targets were validated by the Science Based Target Initiative (SBTi) as being in line with climate science. Our key GHG emissions targets are to reduce absolute Scope 1 and Scope 2 GHG emissions by 60% by 2030/31 from a 2018/19 baseline and reduce absolute Scope 3 GHG emissions (excluding sold electricity) from the same baseline by 37.5% by 2033/34. Our performance to date is illustrated in our Climate Transition Plan (National Grid - Climate Transition Plan 2023/24), which also sets out our action plan to achieve our GHG commitments and Science-Based Targets. For eight consecutive years, we have achieved an 'A' grading (the highest) for our response to the CDP, an international non-profit organization helping companies disclose their environmental impact, and we consistently score well across leading environmental, social and governance (ESG) rating agency indicators.

National Grid also understands the importance of working with our state partners such as the Commonwealth to develop policies and approaches that will help Massachusetts achieve its decarbonization goals. The role of electric utilities in meeting these shared goals is critical because

these goals depend on the electrification of the energy sector. This requires an unprecedented and rapid expansion and modernization of utility infrastructure across the Commonwealth that will require various levels of permitting and, for some projects, MEPA review. Thus, meeting our mutual goals requires collaboration and we appreciate the willingness of the MEPA Office to work together on sensible approaches that take into consideration all facets of the complicated decarbonization puzzle. In the spirit of our ongoing collaboration, we offer the following comments on the straw proposals.

Comments on Proposed Updates to the GHG Emissions Policy

Three aspects of the straw proposal to update the GHG Emissions Policy may impact the review of National Grid projects: (1) the proposal to lower the threshold for land alteration, including forest cutting, from the current threshold of 50 acres to a threshold that references any MEPA trigger for land alteration; (2) the development of standard carbon accounting methodologies for forest conversion; and (3) mitigation requirements and options. We understand the intent and policy behind these proposals and the critical role that forests play in sequestering carbon. However, as discussed below, a "one-size fits all" approach to forest conversion may miss important distinctions between project types and their impacts that should be accounted for in a GHG emissions analysis. Because of this, we recommend that any changes to the GHG Emissions Policy take into consideration the unique issues that surround electric utility transmission projects and that any requirements, including the accounting methodologies, are clear and transparent and provide us with the reasonable certainty that we need to plan and meet our permitting schedules and project timelines.

Utilities like National Grid have existing and fixed infrastructure. Most other project proponents have the ability to site their new infrastructure outside of forested areas, but that is not the case for our projects. Moreover, the vast majority of electric utility projects are replacement and upgrades of existing lines in existing corridors that are necessary to reliably meet the increasing demand for electricity and interconnect green energy infrastructure, which results in a decrease in greenhouse gas emissions. Typically, tree removals for our electric utility projects consist of side-line and danger tree removal along existing utility lines, which are required to meet our state and federal obligations to manage and maintain safe and reliable infrastructure. As a result, with rare exceptions (*e.g.*, the need for and siting of a new transmission line), National Grid is not a developer proposing or conducting large-scale clearing of forested land. The typical National Grid project aims to avoid, minimize and reduce impacts by only targeting tree removals to ensure federally regulated clearances and so that safe and adequate access to transmission line rights-of-way (ROWs) can be maintained.

Given this critical function of electric utilities and the need to rapidly upgrade existing infrastructure to meet the Commonwealth's decarbonization goals, we suggest that any changes to the current trigger for land alteration take into consideration the following:

- Tree cutting within existing utility ROWs that is required to meet regulated clearances or necessary to ensure safe and reliable access to existing ROWs should be exempt from triggering review for land alteration.

- Instead of generally referencing the MEPA land alteration thresholds, which also include limits on impervious area that are not relevant to tree cutting, the Policy should clearly state a threshold for tree cutting and clarify that projects falling under the threshold will not trigger the policy. For example, if the intent of the policy change to is to ensure that it applies to projects that cut more than 25 acres, the policy should clearly state that as the threshold. Without this certainty, it is impossible for project proponents to effectively plan our permitting schedules and meet project deadlines.

- The MEPA Office and the electric utilities should work on carbon accounting methodologies that take into account the full impact of a project on carbon emissions, including impacts that reduce greenhouse gas emissions due to indirect effects such as the interconnection of generation from renewable sources and the avoidance of emissions caused by outages. Projects that demonstrate net benefits or *de minimis* levels of net emissions should not be subject to the policy.

With respect to carbon accounting, we strongly support the development of standard accounting methodologies that fully and fairly address all greenhouse gas emission impacts of a project – including impacts that reduce greenhouse gas emissions. Carbon accounting has become a sophisticated science that can address direct and indirect impacts and, as such, a full-scope accounting should be the goal of the policy.

Finally, with respect to mitigation we request more clarity on the obligation to mitigate and the options for mitigation. To provide more regulatory certainty, we recommend that the policy explain the basis and criteria for requiring mitigation (including what mitigation is required versus what mitigation is voluntary), specify the agency that is responsible for developing and enforcing the mitigation and provide clear guidance on what types of mitigation will meet the project proponent's obligations. Where mitigation is required, National Grid generally supports science-based programs that either directly enhance carbon storage or rates of sequestration or support the resiliency of forest carbon storage. This would include, but not be limited to measures being evaluated by the Department of Conservation and Recreation (DCR) such as: creation of late-successional, complex forest structures; enhancing early successional/pollinator habitat adjacent to transmission line corridors; focused wind firmness enhancements along off-easement access for climate resiliency; or funding of silviculture equipment to assist with better carbon utilization.

We also support the development of an in-lieu fee ("ILF") program, including a program based on large scale land preservation investments. This would support the Commonwealth's Clean Energy and Climate Plan 30% land preservation by 2030 goal. The development of an ILF program would also foster a thoughtful and robust approach to land preservation as a potential mitigation strategy, engage multiple stakeholders, substantially improve efficiency, and reduce costs.

Comments on Proposed Updates to the Climate Change and Adaptation Protocol

National Grid generally supports updates to the Climate Change and Adaptation Protocol that will improve the output and use of the data generated by the ResilientMass Action Team (RMAT) tool based on experience to date with the tool and the Protocol. To that end, National Grid requests that MEPA give consideration to infrastructure, such as utility infrastructure, that is heavily

regulated and required by law to be maintained for the long-term. Unlike a private developer, utility infrastructure is reviewed and then monitored by ISO-NE and state and federal regulators to ensure that it is constructed and then reliably maintained. In our experience, the use of the RMAT tool to review utility infrastructure can result in redundant and sometimes inconsistent results. Additionally, expanding the information from the RMAT tool that is required to be reported in an ENF may implicate sensitive information (Critical Energy/Electric Infrastructure Information) that is prohibited from public disclosure.

With respect to the proposals for additional qualitative analysis, we have the following comments:

- Structure Elevations: Clarify what is meant by "new or substantially improved" infrastructure assets for utility projects.

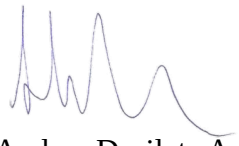
- Extreme Heat: This may be straightforward for a traditional project on a specific site, but would be difficult to implement for linear projects in relatively remote/secluded areas where extreme heat impacts flagged by the RMAT tool are *de minimis*.

- Extreme Precipitation/Flood Impacts: Given the limited options for and impacts from utility infrastructure within linear ROWs, mitigation recommendations from the RMAT tool may not be reasonable or feasible.

Concluding Remarks

National Grid appreciates the opportunity to provide these comments and is committed to continued collaboration with the MEPA Office to meet our mutual decarbonization goals. Thank you for your consideration of our comments and we look forward to working with you further on these proposed changes.

Please feel free to contact us with any questions you may have.



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cc: Lauren Peloquin Shea, Esq., National Grid