

October 31, 2025

Executive Office of Energy and Environmental Affairs (EOEEA)
100 Cambridge Street, 9th Floor
Boston, MA 02114

Written Comments on draft Guidance on Site Suitability Assessments for Clean Energy Infrastructure

To the Massachusetts Executive Office of Energy and Environmental Affairs:

Thank you for the opportunity to provide written testimony to the Executive Office of Energy and Environmental Affairs (EOEEA) in response to the draft Guidance on Site Suitability Assessments for Clean Energy Infrastructure. Acadia Center appreciates the opportunity to provide feedback through written comments at this stage in the development and refinement of the guidance materials.

About Acadia Center and Overview of Comments

Acadia Center is a non-profit research and advocacy organization advancing transformative clean energy solutions that promote a livable climate and a more equitable economy at the state, regional and community levels, primarily in the northeastern U.S. and eastern Canada. Through rigorous data analysis and strategic partnerships, Acadia Center advocates for policies that significantly reduce carbon emissions and address systemic energy challenges. By collaborating with stakeholders, government, business, and communities, Acadia Center pursues ambitious but pragmatic strategies that help to ensure an inclusive and sustainable energy future for all. Acadia Center is heavily involved in Massachusetts policymaking and advocacy, including work on the 2024 Climate Act that initiated this rulemaking process. Acadia Center thanks EOEEA for all of the work thus far in developing these regulations in response to the passage of the 2024 Climate Act. Acadia Center is strongly supportive of the bill and its provisions advancing the clean energy transition, including those pertaining to siting and permitting reform, and the importance of these regulations to ensure effective implementation of the new law could not be more clear.

Feedback on Site Suitability Regulations

First, Acadia Center would like to address the transmission aspects of the draft guidance. The draft includes an “exception” for the site suitability requirements for transmission projects *unless they are in a new right of way*. In other words, only projects in new rights of way will be subject to the site suitability requirements. While Acadia Center agrees on the importance of developing transmission to meet broad goals for reliability and decarbonization, which may in some cases entail projects located in new rights of way, the organization encourages caution on leaving projects in existing rights of way under-reviewed. For projects within existing rights of way, other factors – such as project cost-effectiveness and “right-sizing” for anticipated future load growth and hosting capacity needs – should also be considerations in suitability assessments, and there should not be blanket exemptions, especially for rebuild or asset condition projects (ACPs). This is due to the fact that a failure to right-size those projects could increase the need for additional projects in other existing or new rights of way down the line. As EOEEA agencies are aware, the region is currently facing a massive ballooning of transmission costs driven by ACP investments, which focus only on rebuilds of existing transmission assets. By exempting these projects from more oversight, the spending will continue growing unabated. As a result, Acadia Center encourages EOEEA to find creative ways to remove re-build transmission projects from the exemption and scrutinize their cost-effectiveness and sizing appropriateness closely. This could take the form of the provisions linking back to the new authority and responsibilities conferred to the Department of Public Utilities (DPU) and utilities to ensure proposed ACPs include “due consideration” of Grid-Enhancing Technologies (GETs) and Advanced Transmission Technologies (ATTs), and which screen for cost-effective project alternatives (see [Chapter 239](#), Section 46 of the An Act Promoting a Clean Energy Grid, Advancing Equity, and Protecting Ratepayers).

Additionally, if possible, the large Transmission and Distribution (T&D) definition should be amended against ACP projects being tacitly approved or exempted. Since the definition exempts “reconducted or rebuilt transmission lines at the same voltage,” this could allow ACP projects to potentially get approval without sufficient scrutiny. The small T&D definition does mention “transmission line reconductoring or rebuilding projects”, which Acadia Center supports. If there is a way to clarify that this small T&D definition encompasses the parts omitted from the large definition, that would improve the final guidance.

The guidance also mentions projects having “regional transmission operator approval.” We caution against including this without further specificity on what is meant. This could mean interconnection approval/Permission to Operate, qualification in a capacity market auction, engineering approvals to energize new infrastructure, or even Planning Advisory Committee approval for an ACP project, to name some examples. In addition, given that there are large interconnection wait times for projects currently proposing to be built within ISO-NE, including this as a requirement in the regulation could potentially stall projects already in the queue and develop a chicken-or-egg type of dilemma for projects hoping to seek permitting approval in Massachusetts.

Next, Acadia Center recommends on page 10 of the guidance to create a specific incentive (either for small or large T&D projects) to work to create wildlife corridors as part of their transmission projects, especially if going through an open space. There is strong existing literature on this (see, e.g., National Wildlife Foundation: [Wires and Wildlife: Transmission Development and Western Migratory Species](#)), and it can provide a good model for transmission projects’ interaction with natural spaces. In more urban areas, similar multi-use/multi-purpose arrangements could be given favorable credit in the guidance, for example creating paths for pedestrian use or even potentially bus/transit access (where applicable), and more generally to promote more creative design and utilization of transmission corridors for public benefit, without incurring any added safety risk or making O&M work on lines more difficult. In a similar vein, transmission projects should have the option to list PILOT (payments in lieu of taxes) benefits, as well as partial ownership structures for communities. The regulations also mention community solar credits as a benefit – this should be expanded with transmission projects in mind, where projects can create general rate relief funds/other financial crediting that expands past just the example of community solar. In addition, transmission projects that commit to material design adjustments and route planning choices that correspond with community preferences should also receive favorable credit for those actions as a countable ‘benefit.’

Finally, Acadia Center would like to address social and environmental burdens. First, we appreciate and support the idea raised in the guidance about dual-use design benefits and the emphasis on signing agreements that benefit host community members. However, more clarity is needed between the social and environmental burden and benefits sections. For instance, a MassEnviroScreen Score of 90 and above corresponding with a Site Suitability score of 5.00 seems to lack nuance or place-based/situation-specific flexibility, especially if a negotiation of community benefits can be reached with those same communities (pending verifiable trust and buy-in). Acadia Center recommends editing this section to allow more flexibility, especially if developers and communities are working together to co-design clear benefits.

Conclusion

Thank you in advance for your time and for your consideration of Acadia Center’s written comments. Please do not hesitate to reach out if there are any questions or concerns about the recommendations provided above.

Sincerely,

Anastasiya Poplavska
Senior Policy Advocate
apoplavska@acadiacenter.org
408-759-2087