Town of Sudbury

Office of Select Board
www.sudbury.ma.us

Flynn Building
278 Old Sudbury Rd
Sudbury, MA 01776-1843
978-639-3381
Fax: 978-443-0756

Governor Charlie Baker
Office of the Governor
Commonwealth of Massachusetts
Massachusetts State House
24 Beacon St., Room 280
Boston, MA 02133

Mr. Joseph Nolan
CEO, Eversource
Prudential Building
800 Boylston Street, 17th Floor
Boston, MA 02199

October 5, 2021

Dear Governor Baker and CEO Nolan,

The Sudbury Select Board wishes to update you concerning the Eversource Sudbury to Hudson 115kV Transmission Reliability Project and requests a reexamination of its claimed reliability benefit versus cost in the current energy landscape. The project is still in the permitting stage, with unanswered questions of whether the transmission line can legally[1], feasibly, and safely[2] be constructed and operated in the narrow, inactive rail right-of-way. Before construction can begin through Sudbury and Hudson's drinking water supply, federal, state, and local conservation areas, and valuable natural and historic resources, we ask again: is this $100M+ project needed?

It is now five years and eight months since the project was first presented to our Board in 2016, and thirteen years since the ISO New England (ISO-NE) 2008 Greater Boston Reliability Study gave rise to the project, using forecasts of increasing electric demand that turned out to be wrong. Throughout this time, our region's declining electric demand continues to be reliably served by existing transmission infrastructure in the Metro West ("Marlborough sub-area"). Stopping this transmission project, once called 'urgent' but now over thirteen years in the making, will save electric ratepayers in Massachusetts over $100M in unnecessary capital costs, plus ongoing carrying charges and operating costs.

Energy efficiency and behind-the-meter solar have caused net electric demand trend to reverse course downwards after 2007, contrary to ISO-NE's assumptions at the time.

[1] Surface Transportation Board docket FD_36493
[2] Concerns illustrated through the permit conditions of Sudbury Grant of Location, Sudbury Conservation Commission, and Earth Removal Board

Peak demand has never approached the 32,000MW which the 2008 ISO-NE Regional Outlook[3] anticipated, as plainly illustrated in Figure 1. Eversource's updated analysis[4] in 2017 reflected worst case ("90/10") load conditions of 33,777MW for New England and 7,094MW for Boston subarea in the Year 2023. The latest ISO-NE RSP lowers forecasts[5] of Year 2023 gross peak loads to 30,588MW (New England) and 6,796MW (Boston). The **net** demand forecast, accounting for efficiency (EE) and solar (PV), is reduced to 26,650 (New England) and 5,923MW (Boston) in Year 2023.

Actual peak load the past 4 summers in New England (from ISO-NE website[6]):

June 29, 2021: 25,277MW
July 27, 2020: 24,907MW
July 20, 2019: 23,931MW
August 28, 2018: 25,467MW

These are real numbers, at the peak hour of the hottest days we've experienced, with energy efficiency and behind-the-meter solar functioning to remove load from the transmission grid.

To summarize, if Eversource's new transmission line went into service in the year 2023, even worst-case peak load conditions in New England would be more than 20% lower than ISO New England's 2008 study and Eversource's 2017 analysis planned for. ISO-NE continues to revise its forecasting methodology to account for efficiency and solar, which have particularly high adoption rates in the Metro West. Efficiency (EE) and solar (PV) have already changed the game, as shown in Figure 2. The anticipated effect of active demand response on 'shaving the peak' is not yet accounted for. This will include smart thermostats which customers are opting to let utilities adjust during peak load events, further diminishing the need for this project.

As newer forecasts show significant reductions in net load to be served, it is appropriate to avoid moving forward solutions for obsolete reliability concerns and to ensure that ratepayers' money is not spent unnecessarily, and that the environment is not harmed unnecessarily.

We urge you to stop this new transmission project and advocate for the No Build alternative, given the current energy landscape. New England, and Massachusetts in particular, remains a leader in successfully adopting energy efficiency, and integrating wind, solar, storage, and demand response. Last century approaches, such as creating unnecessary new transmission corridors, are no longer appropriate.

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[3] https://www.iso-ne.com/static-assets/documents/aboutiso/fin/annl_reports/2000/isone_ar_2008.pdf "The region's summer peak is now more than 28,000 MW, while average electricity use the rest of the year is around 18,000 MW. With peak demand rising at about 400 MW per year"

[4] EFSB17-02 Vol I Section 2.7
https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9183976

[5] https://www.iso-ne.com/static-assets/documents/2021/04/forecast_data_2021.xlsx

[6] https://www.iso-ne.com/isoexpress/ System Load Graph

The transmission grid has not been the source of reliability issues in the Metro West region. The overwhelming source of outages continues to be the fragile distribution grid, wires and old transformers dangling on 'telephone poles'. Overhead distribution infrastructure is particularly vulnerable to weather events. Sudbury has participated in your Municipal Vulnerability Preparedness (MVP) program, and we encourage you to advocate for the undergrounding and modernization of aging distribution infrastructure to address resiliency and enable microgrids connecting local clean distributed energy resources (DER) in the face of climate change.

Should the perceived reliability need still justify a new 115kV transmission line into Hudson, we remind you that there are much less environmentally damaging alternatives available. The currently proposed route along the inactive rail corridor through our drinking water supply is unquestionably the most environmentally damaging of the options considered. The excavation and handling of potential contaminants along the MBTA right of way may pose risks to sensitive wetlands and wells serving Sudbury and Hudson. The removal of significant acreage of trees means the loss of valuable stormwater storage, a critical resource for resiliency against flooding.

Testimony before the Energy Facilities Siting Board exposed basic mathematical flaws in the scoring of alternative routes. When corrected, the current project approach would be ranked near the bottom of the list. If the reliability need still exists, the Town of Sudbury remains willing to work with Eversource on a solution that does not cause permanent, negative environmental impacts and public health concerns.

Furthermore, if the transmission line is not constructed on the MBTA right of way, the Town of Sudbury will continue to work cooperatively with the Department of Conservation and Recreation to advance the Mass Central Rail Trail.

The Sudbury Select Board respectfully requests that your office reexamine the claimed reliability benefit of the Eversource transmission project versus its cost in the current energy landscape. We urge you to stop this outdated and unnecessary project, and support more environmentally appropriate approaches to resiliency.

Figures

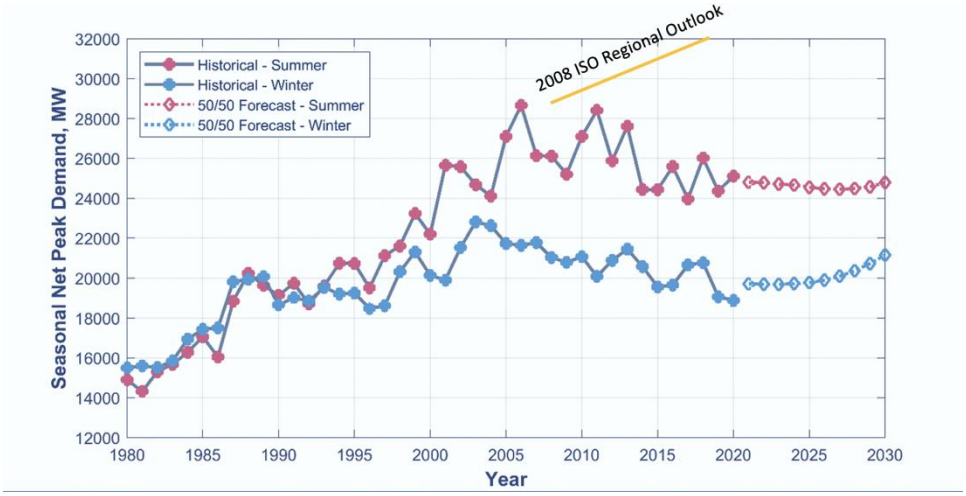


Figure 1: Historical and forecasted summer/winter seasonal net peak demand, 1980-2030[7]. Superimposed yellow line indicates the ISO-NE Regional Outlook in 2008 which predicted peak demand would continue to increase by 400MW per year [8].

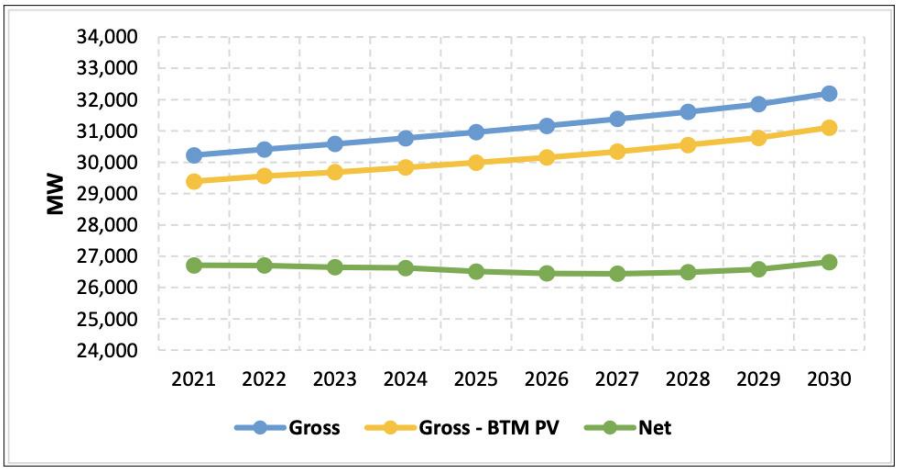


Figure 2: ISO-NE RSP RSP21 gross summer peak demand forecast (90/10) (blue); gross demand forecast minus BTM PV (orange); and net of EE and BTM PV demand forecast (green) for 2021 to 2030 (MW)

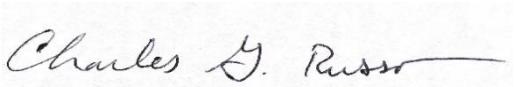
[7] Source: ISO-NE 2021 Regional System Plan https://www.iso-ne.com/static-assets/documents/2021/09/draft_rsp21_report.docx

[8] From 2008 ISO-NE Regional Outlook: https://www.iso-ne.com/static-assets/documents/aboutiso/fin/annl_reports/2000/isone_ar_2008.pdf "The region's summer peak is now more than 28,000 MW, while average electricity use the rest of the year is around 18,000 MW. With peak demand rising at about 400 MW per year"

Sincerely,

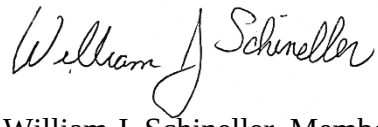
Sudbury Select Board

Jennifer S. Roberts, Chair



Charles G. Russo, Vice-Chair

Janie E. Dretler, Member



William J. Schineller, Member

cc:
Maura Healey, Attorney General
Kathleen Theoharides, Secretary of Energy and Environmental Affairs
Ed Markey, US Senator, Massachusetts
Elizabeth Warren, US Senator, Massachusetts
Katherine Clark, US Representative 5th District of Massachusetts
Lori Trahan, US Representative 3rd District of Massachusetts
Mike Barrett, MA Senator, Third Middlesex District
Jamie Eldridge, MA Senator, Middlesex and Worcester District
Carmine Gentile MA Representative, Thirteenth Middlesex District
Kate Hogan, MA Representative, Third Middlesex District
Jon Chesto, Boston Globe
Hudson Board of Selectmen
Conservation Law Foundation