



79 Robert Best Road
Sudbury, MA 01776
Mail: info@protectsudbury.org

May 18, 2017

Via hand delivery and email Stephen.August@state.ma.us

Stephen August, Esq, Presiding Officer
Energy Facilities Siting Board
One South Station
Boston, MA 02110

Re: NSTAR Electric Company d/b/a Eversource Energy, ESFB 17-02

Dear Mr. August:

This letter is sent in direct opposition to NSTAR Electric Company d/b/a Eversource Energy's ("Eversource") proposal to construct, operate and maintain an approximately 9-mile, 115-kV transmission line (the "New Line"), 7.6 miles of which will be located on an inactive Massachusetts Bay Transportation Authority ("MBTA") railroad property passing through the municipalities of Sudbury, Hudson, Stow and Marlborough. Protect Sudbury, Inc. ("PS, Inc.") is a non-profit 501c(4) grassroots community organization, comprised of concerned citizens and local businesses all seeking to preserve and protect the environment, landscape, health, safety, historic character and local economy of our town.

Protect Sudbury Inc. understands that, while Eversource has proposed constructing the New Line underground, Eversource was required to, and did, identify and evaluate alternative routes, including the construction of an overhead transmission line along the same MBTA corridor as well as an under street alternative.

Protect Sudbury opposes the construction of the New Line and all of the proposed routes. Our opposition is based upon the following:

1. Failure to adequately demonstrate the immediate need for the New Line;
2. The existence of vetted alternatives that meet ISO New England's reliability goals on existing rights of way at comparable cost;
3. The permanent and lasting damage done to protected and environmentally-sensitive conservation lands;
4. The clear and present danger presented to public health and safety;
5. The irreversible destruction of documented historic settings and artifacts;
6. The unrecoverable financial losses to businesses and homeowners;
7. The documented history of Eversource failing to comply with local by-laws as well as acting with disregard to the rights of homeowners adjacent to existing rights of way; and
8. The serious risk of contamination to the Town of Sudbury's source of drinking water.

In addition, PS, Inc. strongly objects to the 'piggybacking' by the Massachusetts Department of Conservation and Recreation ("DCR") of a non-transmission related project, i.e. the Mass Central Rail Trail ("MCRT") project. The implicit assumption that such a project would be welcomed by the community at such a high cost to our community is erroneous. Bundling these two projects in an attempt to sway public opinion, is grossly inappropriate and unjustly transfers the financial burden of the underlying construction costs to the electricity rate payers.



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Moreover, the use of Eversource for the underlying public recreation project creates inherent conflicts as they relate to the public bidding laws. Further, the funding of such a recreational project should not in any way be part of this filing nor should any of the associated costs for this project be ultimately borne by the New England electric ratepayer base.

The unreasonable and unwarranted financial burden that has been placed upon the Town of Sudbury and its citizens by a for-profit, multi-billion dollar corporation is punitive in nature and a gross misuse of the special status that public utilities are afforded. The process for awarding projects, such as the proposed project, is broken when the burden of proof is unfairly placed upon a community in the eleventh hour of a process that began in 2008. The process is broken when costs can vary by over 50% throughout the project life cycle and the basis for these costs is considered proprietary information that can only be revealed through a lengthy and expensive legal process.

We request on this basis that you immediately reject the petition filed by Eversource Energy and turn this project back to ISO New England for further review and subject to FERC 1000 requirements.

Thank you for your time and consideration in this matter.

Regards,

Raymond Phillips

President, Protect Sudbury