

**COMMONWEALTH OF MASSACHUSETTS  
ENERGY FACILITIES SITING BOARD**

**Petition of Vineyard Wind LLC Pursuant**                    )  
**to G.L. c. 164, § 69J for Approval to**                    )  
**Construct, Operate, and Maintain**                    )  
**Transmission Facilities in Massachusetts**                    )                    **EFSB 17-05/18-18**

**SUMMARY OF FINAL COMMENT ON PETITION  
OF VINEYARD WIND LLC PURSUANT TO G.L. c. 164, § 69J**

This summarizes our Final Comment submitted on December 11, 2018 to the EFSB. We submit this before issuance of the Decision of Hearing Officer Sedor. It offers these points: first, Section 83C ordered an auction to select bids for delivery of offshore wind energy but the consultant's evaluation inappropriately displaced the auction; second, Vineyard Wind's individual proposal to interconnect with the NEISO grid on Cape Cod is less cost effective than a joint transmission project (like the line from Hydro Quebec) to serve all BOEM leaseholders to interconnect at Brayton Point given significant economies of scale in cable laying (i.e., the Legislature and Governor can amend Section 83 to allow the distribution utilities to pay for such a joint transmission project solicited through auction with EFSB approving Vineyard's current Application contingent on acceptance of service through this joint transmission project when approved); third, the implicit endorsement of dispersed landfalls will likely increase interconnection cable costs; fourth, Vineyard's proposal seems intended to displace a cost effective interface for a Nantucket Sound offshore wind facility, but perhaps this was the primary intention; fifth, the DPU can assist Eversource in finding alternative ways to recover its interconnection costs (not currently 'used' and 'useful') at its Mary Dunn substation; sixth, the potential contamination of water quality was not completely litigated; and seventh, Vineyard's proposed termination is adjacent to a large affordable 40B LIHTC housing project, Village Green, located in the Independence Industrial Park, the Town having inappropriately allowed a 40B in the Park which it designated for joint industrial, commercial and residential use (i.e., Section 40B is intended to expedite location in a residential area not an industrial park)--does the Commonwealth care so little about these residents?

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