

**COMMONWEALTH OF MASSACHUSETTS  
ENERGY FACILITIES SITING BOARD**

Petition of Medway Grid, LLC Pursuant to G.L. c. 164, § 69J ¼ for Approval to Construct a 250 MW Battery Energy Storage System in Medway, MA	) ) ) ) )	EFSB 22-02
Petition of Medway Grid, LLC, Pursuant to G.L. c. 40A, § 3 for Exemptions from the Town of Medway Zoning Bylaws	) ) ) ) )	D.P.U. 22-18
Petition Medway Grid, LLC, Pursuant to G.L. c. 164, § 72 for Approval to Construct a New 345 kV Electric Transmission Line in the Town of Medway, MA	) ) ) ) )	D.P.U. 22-19

**MOTION OF MEDWAY GRID, LLC TO CONSOLIDATE  
ABOVE-CAPTIONED PROCEEDINGS**

Now comes Medway Grid, LLC (“Medway Grid” or the “Company”) seeking consolidation of the above-captioned proceedings by the Energy Facilities Siting Board (“Siting Board”) for review. In support thereof, the Company states as follows:

1. On this date, Medway Grid filed a petition with the Department of Public Utilities (the “Department”), pursuant to G.L. c. 40A, § 3, seeking individual and comprehensive zoning exemptions from the Zoning Ordinances of the Town of Medway in connection with the construction and operation of a battery energy storage system (the “Zoning Petition”) (D.P.U. 22-18).

2. Also on this date, Medway Grid filed a petition with the Department pursuant to G.L. c. 164, § 72, seeking approval to construct and operate an approximately 1,325 foot underground 345 kilovolt (“kV”) electric transmission line (the “New Line”) designed to interconnect the proposed 250 MW / 500 MWh standalone battery energy storage system (“BESS”) to Eversources’s existing West Medway Substation (the “Eversource Substation”) (the “Section 72 Petition”) (D.P.U. 22-19).
3. Also on this date, Medway Grid filed with the Energy Facilities Siting Board a petition for approval of the Project pursuant to G.L. c. 164, § 69J ¼ (the “Section 69J ¼ Petition”) (EFSB 22-02).
4. Consistent with Department precedent, Medway Grid filed a motion today with the Department requesting that the Section 72 Petition and the Zoning Petition be referred to the Siting Board. By this Motion to the Siting Board, the Company is requesting that the Section 72 Petition and the Zoning Petition be consolidated with the Section 69J ¼ Petition for the issuance of a consolidated order by the Siting Board. New England Power Company d/b/a National Grid, EFSB 13-2/D.P.U. 13-151/13-152, at 3 (2014); NSTAR Electric Company, EFSB 10-2/D.P.U. 10-131/10-132, at 2 (2012).


5. Consolidation of these matters is contemplated by G.L. c. 25, § 4, which states:  
“In order to promote efficiency in administration... [the chairman of the Department] may refer matters related to the need for, construction of, or siting of facilities, as defined in section sixty-nine G of chapter one hundred and sixty-four, as [the chairman] deems appropriate to the [Siting Board] in accordance with section 69H of chapter one hundred and sixty-four.” Similarly, G.L. c. 164, § 69H states that the Siting Board may “accept for review and approval or rejection any application, petition, or matter related to the need for, construction of, or siting of facilities referred to the chairman of the [D]epartment pursuant to section four of chapter twenty-five.”
6. Similarly, the Department “may order proceedings involving a common question of law or fact to be consolidated for hearing on any or all of the matters in issue in such proceedings.” 220 C.M.R. § 1.09.
7. The Project meets the consistent standards of the Siting Board and Department under G.L. c. 164, §§ 69J ¼ and 72, respectively, because these facilities are:  
(a) necessary to ensure a reliable energy supply with a minimum impact on the environmental at the lowest possible cost; and (b) needed and will serve the public interest. In addition, the Project satisfies the requirements for zoning exemptions pursuant to G.L. c. 40A, § 3 because it is “reasonably necessary for the convenience or welfare of the public.”
8. Each of the three petitions involves common questions of law and fact, and consolidation of the proceedings would further the interests of administrative efficiency.

**WHEREFORE**, Medway Grid respectfully requests that the Siting Board consolidate the Section 72 Petition and the Zoning Petition with the Section 69J ¼ Petition.

Respectfully submitted,

**Medway Grid, LLC**

By its attorney,

A handwritten signature in cursive script, appearing to read "Andrew O. Kaplan".

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Dated: February 25, 2022