



BLUEWAVE

Section 83E Round 2 Request for Proposal PUBLIC Submission for MA Acton 100 Discovery Way Storage

Prepared For:

Massachusetts Department of Energy
Resources

Electric Distribution Companies:

Fitchburg Gas & Electric Light Company
d/b/a Unitil

Massachusetts Electric Company and
Nantucket Electric Company, each d/b/a
National Grid

NSTAR Electric Company d/b/a
Eversource Energy

Applicant Information**Applicants:**

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Table of Contents

Section A-1: Certification, Project, and Pricing.....3

Section A-2: Executive Summary of the Proposal4

Section A-3: Operational Parameters and Operational Schedule5

Section A-5: Financial and Legal9

Section A-6: Interconnection, Deliverability, and Reliability11

Section A-7: Siting, Permitting and Community14

Section A-8: Safety.....20

Section A-9: Engineering and Technology; Commercial Access to Equipment22

Section A-10: Project Schedule.....23

Section A-13: Project Management and Experience27

Section A-14: Economic Development and Employment Benefits, Transitioning Fossil Fuel Communities, Benefits to Low Income Ratepayers and Environmental Justice Communities, and Other.....28

Section A-1: Certification, Project, and Pricing

The Certification, Project and Pricing Data (“CPPD”) document is a Microsoft Excel workbook that is provided on the website at www.MACleanEnergy.com. Each Transmission Project and Distribution Project submitted by bidder must include a unique, accompanying CPPD document.

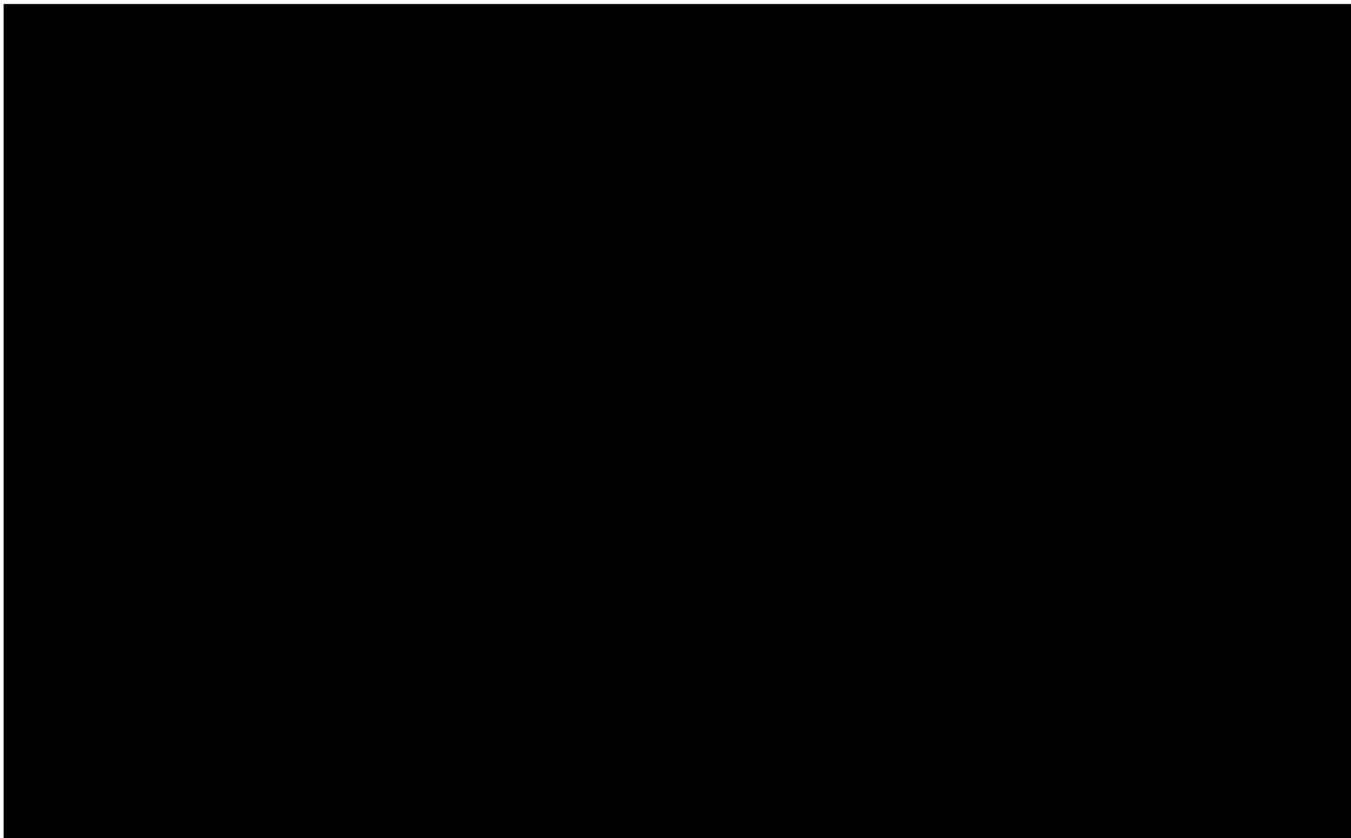
Acton: Please refer to file named *MA Acton 100 Discovery Way Storage – 83eii_cppd_final*.

Section A-2: Executive Summary of the Proposal

The bidder is required to provide an executive summary of the project proposal that includes a complete description of the proposed Energy Storage System bid, the proposed contract term and pricing schedule, interconnection plan, the overall project schedule and other factors the bidder deems to be important. A table summarizing proposal(s) including details such as storage project location, interconnection location(s), capacity (MW), duration (hours), projected annual average CPECs or Environmental Attributes (if applicable), energy storage technology to be deployed, commercial operation date, pricing (e.g., \$/CPEC, \$/environmental attribute, \$/MWh), etc. is encouraged. Bidders submitting multiple Transmission Projects or Distribution Projects must provide an executive summary for each project.

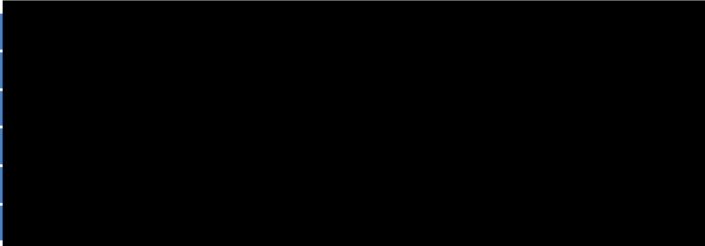
This bid package consists of four coordinated submission documents: one Portfolio Bid Response Form containing materials common to all three projects, and three project-specific Bid Response Forms for the Newburyport, Swansea, and Acton Projects. Consistent with Section 1.7.3 of the RFP, each Project is submitted for separate evaluation, while shared bidder and organizational information is provided once in the portfolio submission.

Acton Project (MA Acton 100 Discovery Way Storage)



Proposal Summary Acton Project	
Project Location	100 Discovery Way, Acton, MA 01720
Interconnection Location	

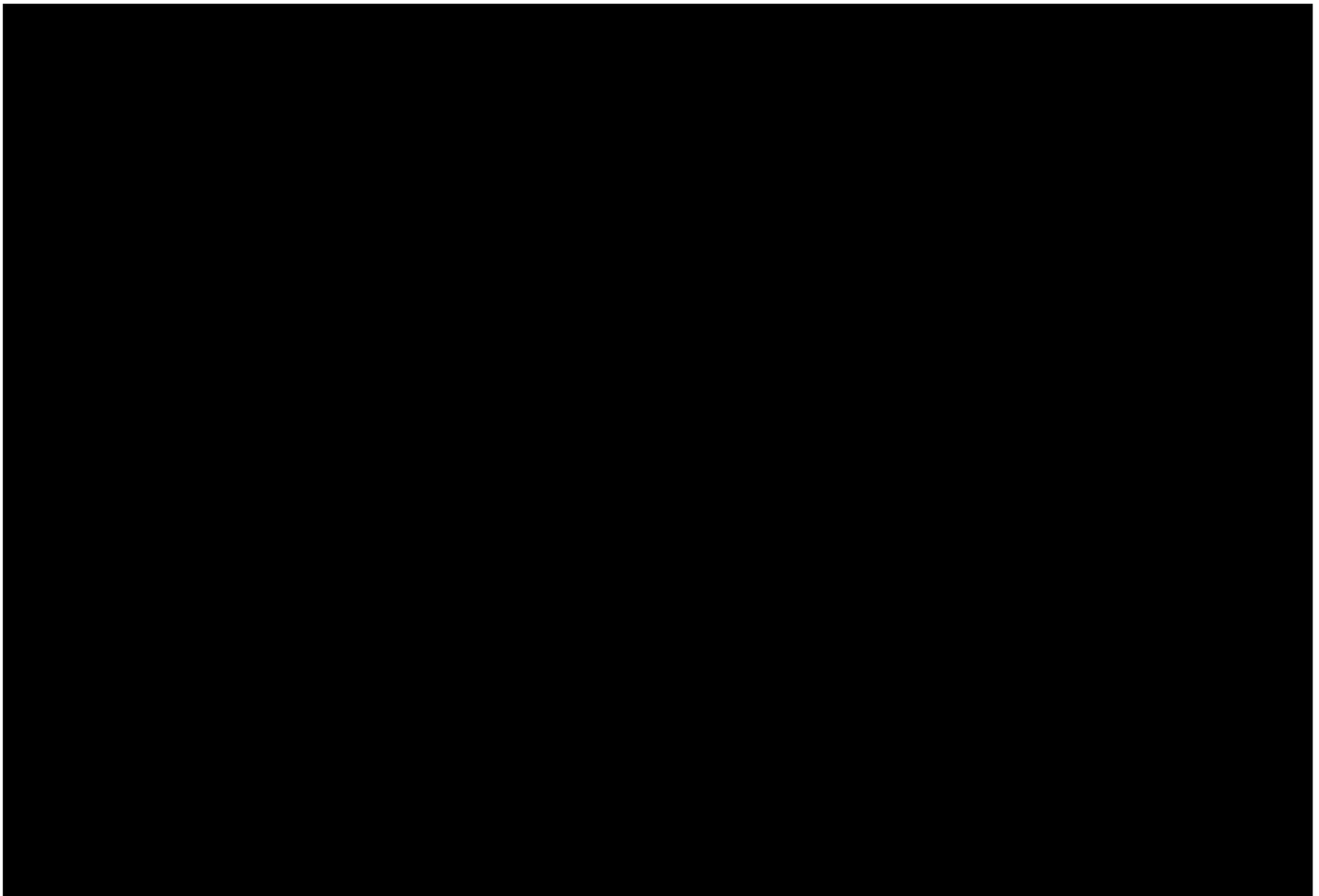


Capacity (MWac)	
Duration (hours)	
Projected Annual Average CPECs or EAs	
Energy Storage Technology	
Commercial Operation Date	
Pricing (\$/CPEC)	

Section A-3: Operational Parameters and Operational Schedule

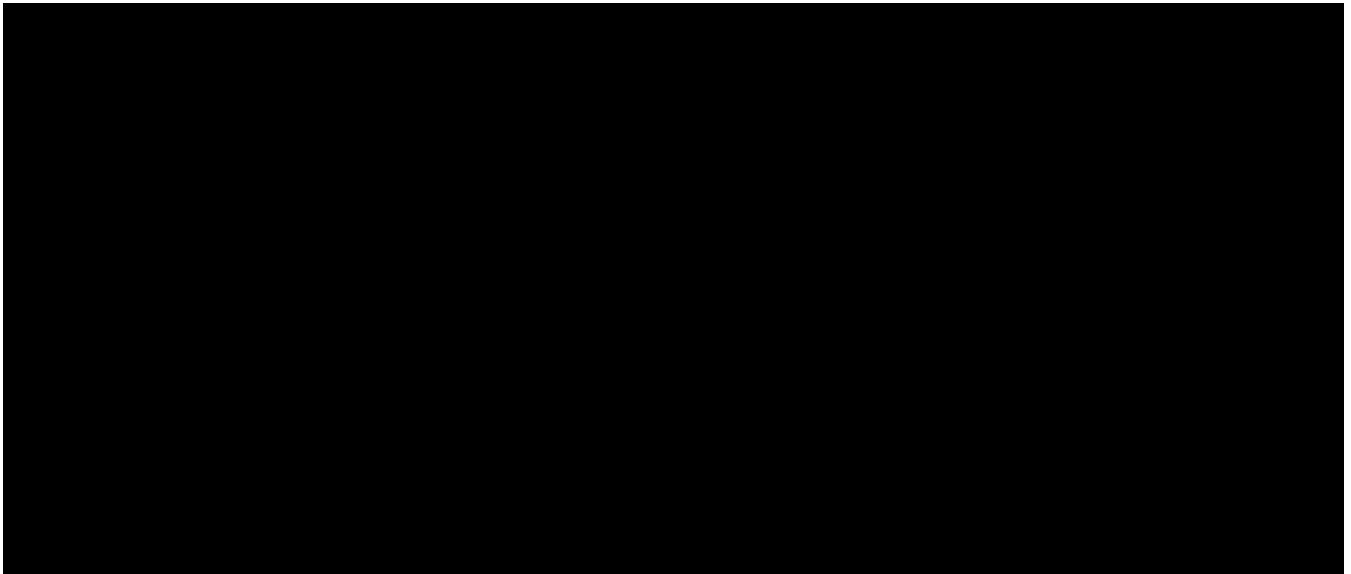
Please answer the following questions in Section A-3 for each Transmission Project and Distribution Project being bid. If developing the project in phases, please break out information for each phase.

3.1 Energy Storage System Operations Project Summary – Please provide the following:



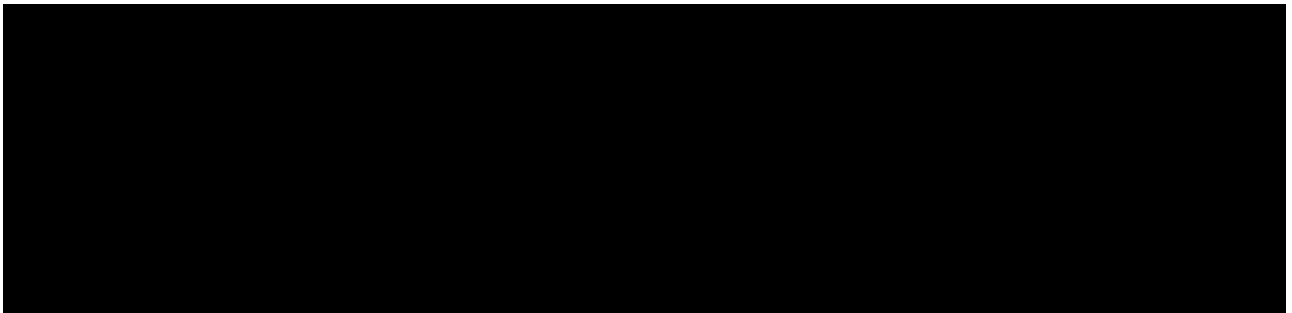
3.2 Describe the operation of the proposed Energy Storage System: (i.e. run hour limitations, ramp rates, spinning reserves, regulation up, regulation down). Please provide proposed operational management terms that memorialize the operational commitments of the facility.



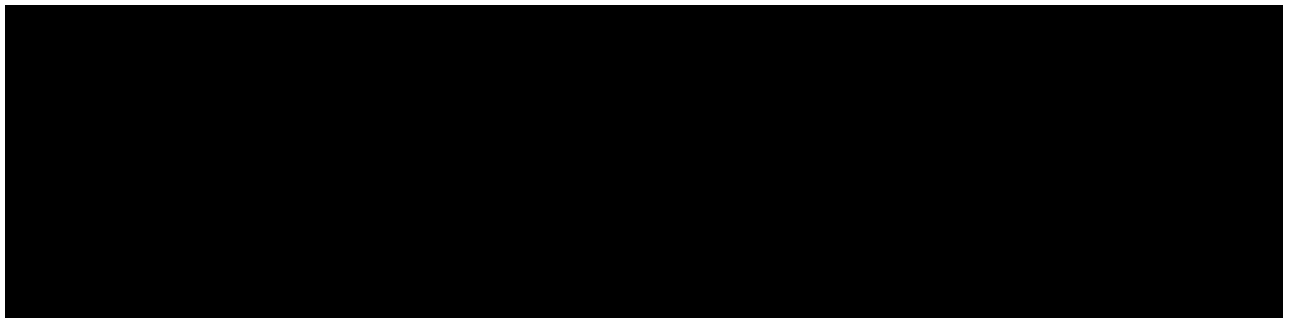


3.3 Describe the location of the Energy Storage System, in terms of:

i. The anticipated interconnection point

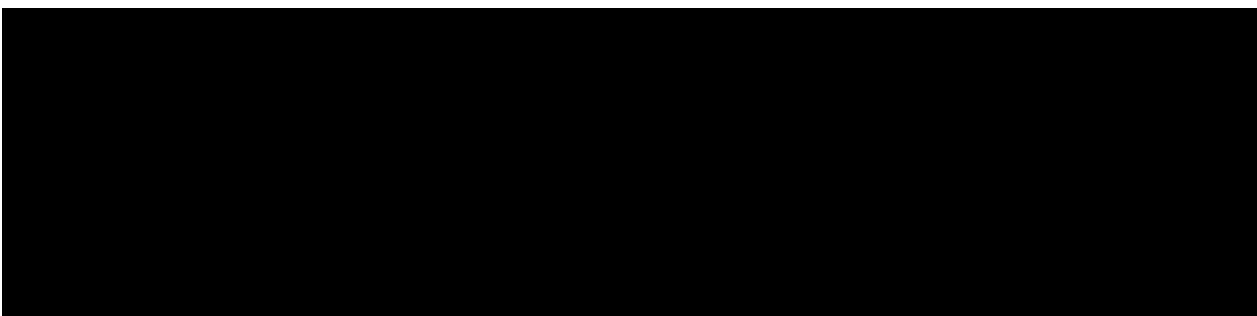


ii. The value of the relative proximity of the system to large loads and/or any clean energy generation facility, including any decreased risk of curtailment and/or deferred investment for the generation facility



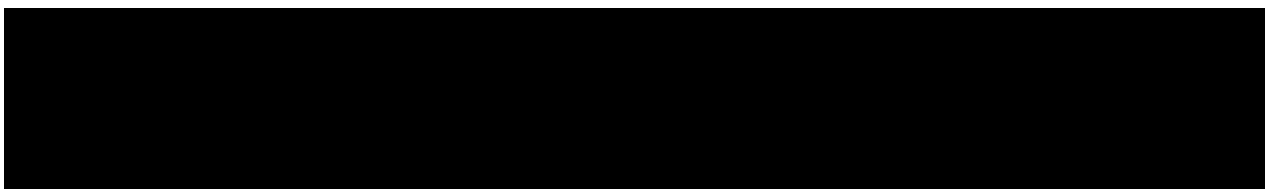
With respect to renewable generation facilities, there are several distribution-scale solar PV facilities near the project. Across Route 2, there is an operating 2MW solar project on the Acton Town landfill. To the southeast, there are a number of active solar PV arrays built across land contained within the WR Grace Superfund site, the most recent of which is a 7.1MW PV + 8MWh BESS facility that had its ribbon cutting in May 2026.

iv. If the project location is in proximity to other Energy Storage Systems



There are other operational energy storage systems located within Acton, such as the DC-coupled PV+BESS projects referenced in Section 3.3. ii. Additionally, there is an operating, standalone BESS system at the Acton-Boxborough Regional High School. The system operates as a 2.1MW hybrid Behind-the-Meter and Front-of-the-Meter system.

- v. How the location was strategically located to maximize grid benefits and align with transmission and distribution planning priorities, such as deferring or eliminating the need for costly transmission and distribution upgrades



3.4 Describe the proposed technology and equipment manufacturer by name and model (include inverter characteristics if applicable).

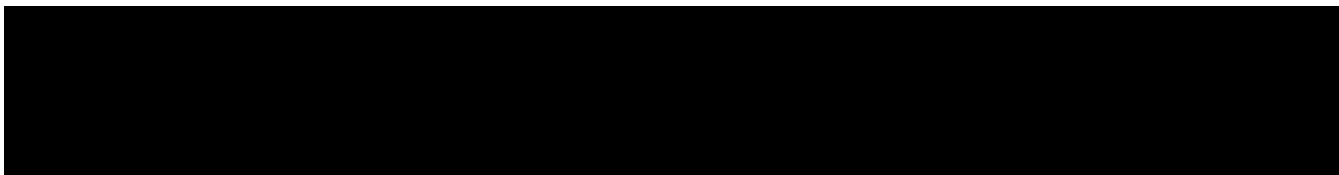
The design and inverter characteristics for the Acton Project are as follows:



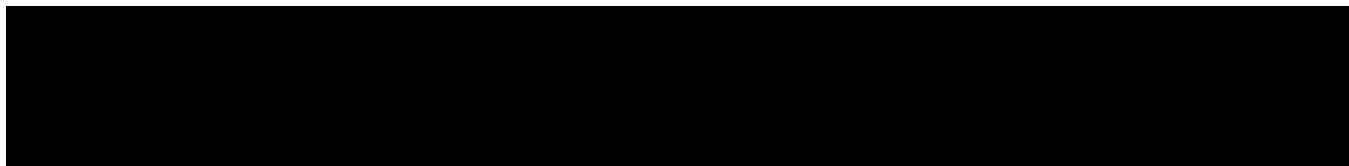
3.7 Please describe how, as a Qualified Energy Storage System as defined in 225 CMR 21.00 Clean Peak Energy Standard (CPS), the storage system will meet the CPS requirements location or contractual pairing with an RPS qualified resource, describe/include plans for charging coincident with periods of typically high renewable energy production, or include an operational schedule in the Qualified Energy Storage System's Interconnection Service Agreement demonstrating that the Qualified Energy Storage System serves to resolve load flow or power quality concerns otherwise associated with intermittent renewable energy resources.



3.8 Please list and describe all anticipated revenue streams associated with the Energy Storage System, including, but not limited to, the designation of the ISO-NE Markets that the Energy Storage System would participate in, the plan to operate in multiple ISO-NE Markets, and revenue streams from other third-party contracts/arrangements. For existing facilities, describe existing operations, revenues, and participation in ISO-NE Markets and describe any planned changes in operation, participation in ISO-NE Markets, and revenue streams.



3.10 Operating Constraints – Specify all the expected operating constraints and operational restrictions for the project (e.g., limits on the number of hours a unit may be operated per year or unit of time or charge / discharge cycles per year).

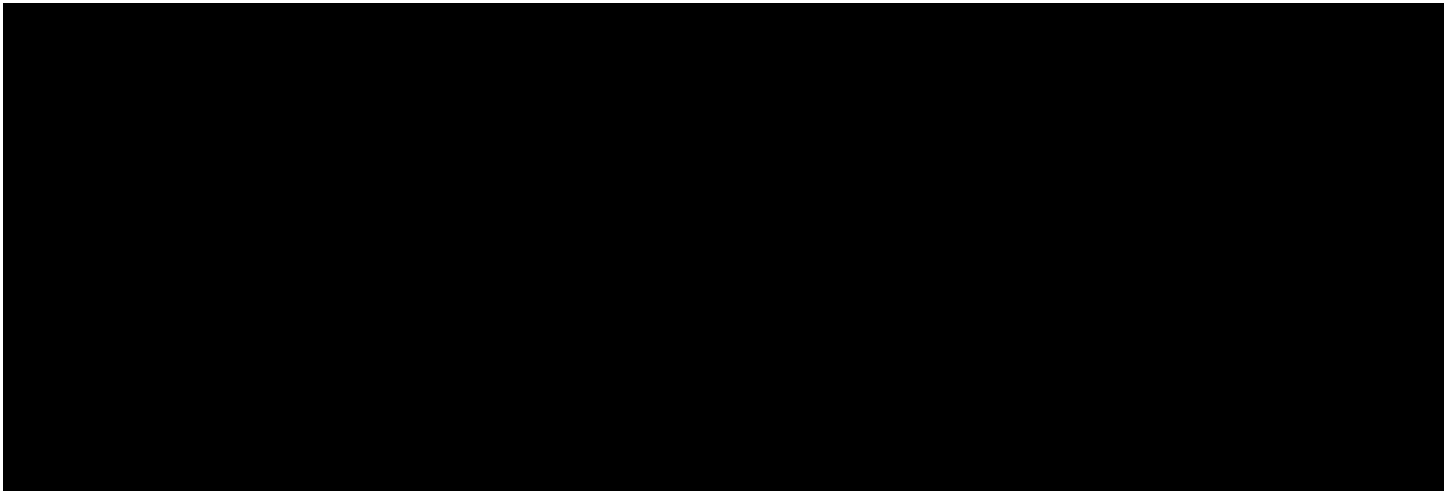


Section A-5: Financial and Legal

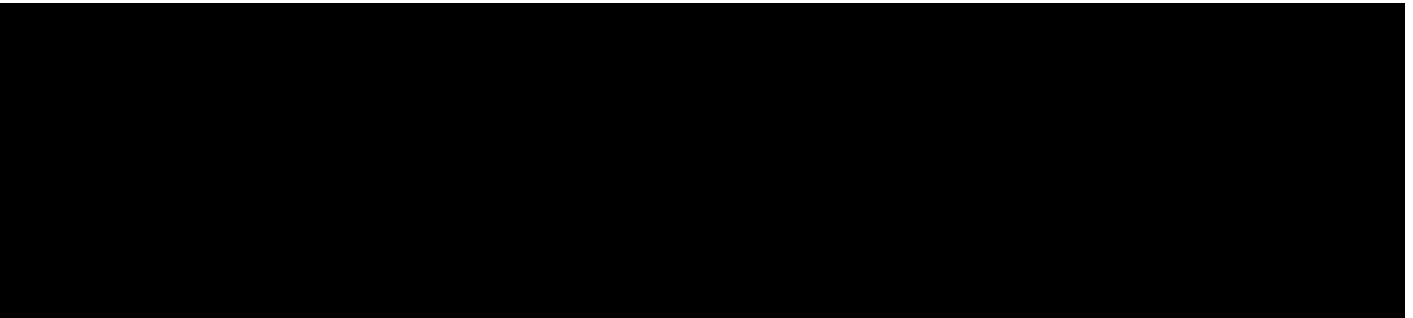
For all project-specific questions in Section A-5, if bidding in multiple Transmission Projects or Distribution Projects, please answer each question for each Transmission Project or Distribution Project being bid.

5.3 Please provide a description of the financing plan for the project, including construction and term financing. The financing plan should address the following:

- iv. Estimated construction and other costs to develop and operate the project



- v. The projected capital structure

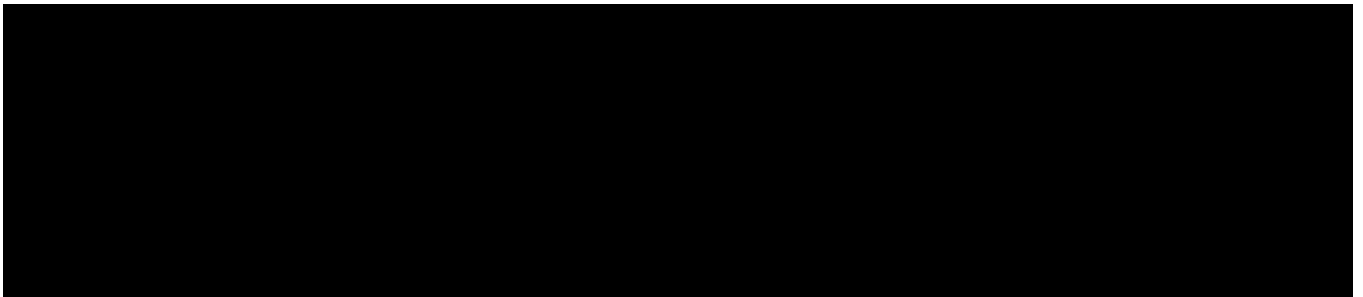


5.14 Describe the role of the Federal Investment Tax Credit (“ITC”), and any other incentives or awards, on the financing of the project. In your response, please describe (a) your plan to qualify for the ITC and the level of the ITC for which you plan to qualify, (b) the facilities, investment in which, the ITC is expected to apply, (c) your plan to utilize the tax credits and the relationship to your financing plan, and (d) how qualification for the ITC is reflected in your proposed pricing. Please also describe qualification plans, applicability and utilization of any other Federal incentives or awards.

Bidders must clearly state their assumptions regarding the availability of federal or state tax credits, subsidies, or grants or other incentives, including but not limited to those available under the Inflation Reduction Act of 2022 (IRA), the Infrastructure Investment and Jobs Act of 2022, and the One Big Beautiful Bill Act (the “OBBBA”).

Bidders should describe any plans to meet federal domestic content and labor requirements in order to maximize federal tax credits available to the project under the IRA and the OBBBA . Bidders must also describe plans to pursue state funding available to energy storage projects.

As part of the provisions of the OBBBA, the Bidder must describe the credibility and status of compliance with “foreign entities of concern” (FEOC) and provide compliance documentation (e.g. preparation of non-FEOC reports, certifications, or existing safe harbor provisions). In addition to describing how bidder will qualify and demonstrate initial compliance with FEOC, bidder must also provide a description of bidder’s plan to remain compliant throughout the life of the project, including but not limited to retaining effective control of the project throughout its lifecycle, to avoid any recapture of ITC.



5.26 Identify all regulatory and other approvals needed by bidder to execute a binding sale agreement.

The Acton Project has received its SIS along with i.3.9/PPA approval and has fully executed and fully paid its ISA.

Section A-6: Interconnection, Deliverability, and Reliability

Please answer the following questions in Section A-6 for each Transmission Project and Distribution Project being bid:

6.1 Please provide documentation to show evidence of the interconnection request or application to ISO-NE or the applicable Distribution Company. For Transmission Projects, provide evidence of a commitment to interconnect to the ISO-NE PTF at a level equivalent to the Capacity Capability Interconnection Standard, or alternatively at the Network Resource Interconnection Standard under a Surplus Interconnection Service arrangement where the Original Interconnection Customer receives Capacity Network Resource Interconnection Service. For Distribution Projects, provide documentation describing the steps the project will take to screen for and, if applicable, establish equivalent Capacity Network Resource Capability (eCNRC) Please describe the status of any planned interconnection to the grid.

6.2 Provide studies that describe the Project's electrical system performance, its impact to the reliability of the New England Transmission system, how the project would satisfy ISO NE's I.3.9 requirements, and how the project, for Transmission Projects, will interconnect at an equivalent to the Capacity Capability Interconnection Standard or, for Distribution Projects, establish eCNRC. Projects that do not have I.3.9 approval from ISO-NE must include technical reports or system impact studies that approximate the ISO-NE interconnection process, including but not limited to clear documentation of study technical and cost assumptions, reasoning, and justification of such assumptions. All projects must also provide analysis that approximates the ISO-NE CCIS interconnection analysis as defined in the applicable ISO-NE Planning Procedure(s). Please also provide the status and expected completion date of any additional interconnection studies already underway with ISO-NE and/or the transmission owner. All studies must follow the current ISO-NE interconnection procedures and detail any assumptions regarding resources ahead of the Project in the ISO-NE interconnection process as defined in the ISO-NE tariff and/or Planning Procedure(s). All network upgrades identified in these studies must be clearly documented and included in the bid price. Provide a copy of an interconnection agreement, if any, executed by the bidder with respect to the proposed project. If an interconnection agreement has not been executed, please provide the steps that need to be completed before an interconnection agreement can be executed and the associated timeline.

- i. Copy of completed I.3.9 approval or I.3.9-equivalent study attached: ☒ If none, please explain:

Refer to file titled **6.2.i - Acton - I.3.9. Letter.**

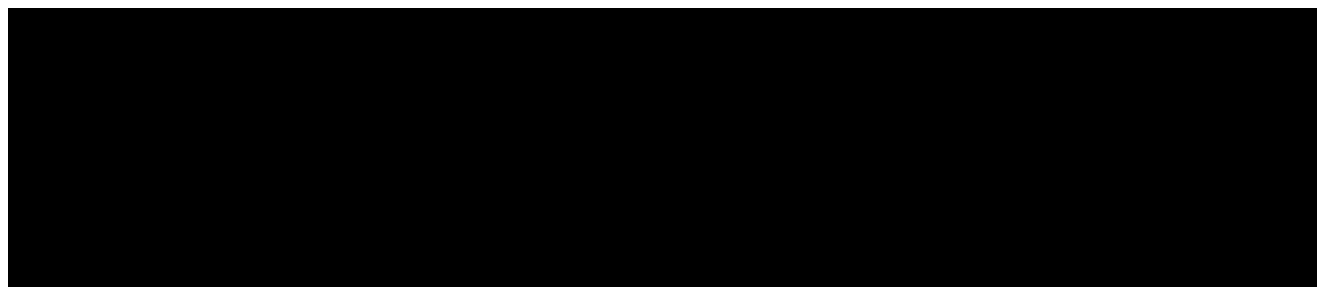
- iii. Copy of Interconnection Agreement attached: ☒ If none, please explain:

Please refer to files titled **6.2.iii - Acton - Interconnection Agreement (ISA)** and **6.2.iii - Acton - Interconnection Agreement (ISA) 2nd Amendment.**

- iv. Additionally, any other studies undertaken by ISO-NE, the Distribution Company(s), or the bidder must be provided

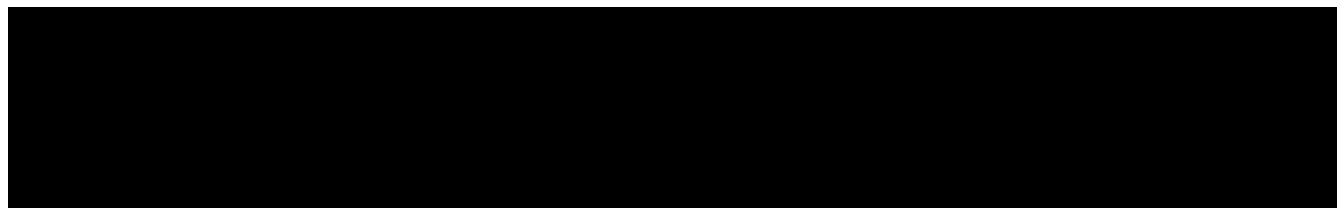
Refer to file titled **3.3.i. - Acton - System Impact Study.**

6.4 Please provide cost estimates for any and all necessary network (transmission and/or distribution) upgrades identified in the studies identified in 6.2, or otherwise known to the bidder, and any payments that have been made towards those upgrades.



6.5 Provide the electrical models for both Transmission and Distribution Projects for transmission level power flow analysis of all energy resources supporting the proposed project in accordance with the filing requirements of the ISO-NE Tariff Schedule 22 and 23. Distribution Projects should indicate the substation bus (not feeder) at which injected power is expected. NOTE: Short-circuit, stability, and PSCAD models are not required.

- i. Power flow modeling data attached: If none, please explain:



6.6 Provide a copy of an electrical one-line diagram showing the interconnection facilities, the relevant facilities of the transmission and/or distribution provider, and any required network upgrades identified in the studies required in section 6.8 of this document

- i. Electrical one-line diagram attached:  If none, please explain:

The single line diagram for the Project is attached in file **6.6.i. - Acton - Single Line Diagram.**

This includes electrical information on the POI/PCC work listed as part of the Project's upgrades. Diagrams of network upgrades, if available, can be found in the System Impact Study provided by the Distribution Company.

6.8 Please detail with supporting information and studies (as available) that the production/delivery profile contemplated in your proposal reflects constraints or curtailments, if any, after the upgrades that are expected to take place for a Transmission Project, pursuant to interconnection at an equivalent to the CCIS. For a Distribution Project, detail any transmission or distribution upgrades expected to take place to establish eCNRC, to the extent presently

known. If you are planning to make voluntary upgrades beyond those associated with the CCIS-equivalent standard or the eCNRC, please describe the transmission and/or distribution network upgrades necessary, their estimated cost (for which the bidder would have cost responsibility), and the impact on the proposed generation schedule by reducing remaining constraints or curtailment

There are no expected upgrades required to establish eCNRC beyond the upgrades required for the project to receive Permission to Operate / Authorization to Interconnect onto the Distribution system.



Section A-7: Siting, Permitting and Community

Please answer the following questions in Section A-7 for each Transmission Project and Distribution Project being bid:

7.1 This section addresses permitting and other regulatory issues associated with project siting, development and operations for all phases of the project (including generation, delivery, storage, interconnection, etc.), and in all jurisdictions (state, local, federal). Provide a site plan (or plans) including a map (or maps) that clearly identifies the location of the proposed project site, energy storage project locations, the assumed right-of-way width, the total acreage for the Energy Storage System, the anticipated interconnection point (or, if applicable, multiple interconnection points), the related transmission and interconnection facilities, deployment facilities, and the relationship of the site to other local infrastructure, including transmission and distribution facilities, roadways, federal and state waters, and waterways. In addition to providing the required map(s), provide a site layout plan which illustrates the location of all major equipment and facilities described above

Plan included? Yes ☒ No ☐ If not, please explain:

Please refer to the following files: (1) **7.1. - Acton - Issued for Permit Site Plan**, (2) **7.1. - Acton - Site Plan Site Visualization #1**, (3) **7.1. - Acton - Site Plan Site Visualization #2**, & (4) **7.1. - Acton - Locus Map**.

7.2 Identify any real property rights (e.g., fee-owned parcels, rights-of-way, development rights or easements or leases, or options to purchase or lease) that provide the right to use the energy storage site any rights of way needed for interconnection.

- (v) Provide a copy of each of the leases, agreements, including option agreements, easements, rights of way and related documents granting the right to use the energy storage system site and transmission and interconnection locations (and applicable letters of intent if formal agreements have not been executed).

For the Ground Lease Agreement, please refer to the file titled **7.2.v. - Acton - Lease Agreement** and **7.2.v. - Acton - First Amendment to Lease Agreement**. And then for the Notice of Lease and Easements please refer to the file titled **7.2.v. - Acton - Notice of Lease**.

7.3 Provide evidence that the Energy Storage System site and interconnection locations are properly zoned or permitted. If the Energy Storage System site and interconnection locations are not currently zoned or permitted properly, identify present and required zoning and/or land use designations and permits and provide a permitting plan and timeline to secure the necessary approvals.

7.4 Permitting plan and timeline - Enter appropriate explanation in this space or reference applicable attachment(s)

Acton: Fully permitted

Start Date: 7/19/2022

End Date: 04/06/2023

7.5 Provide a description of the area surrounding the Energy Storage System site and interconnection locations, including a description of the local zoning, flood plain and aquifer information, existing land or waterway use, and setting.

The Acton Project is sited on a 15.48-acre parcel that is primarily developed as an active office building and associated parking lot. To the north of the Project site is Route 2, to the west and east are additional commercially developed properties, and approximately 250-300' to the south begins a residential neighborhood. The proposed point of interconnection is an Eversource-owned pole on Piper Road, which is approximately 1,000' from the project site. The Project will run an underground MV line to the pole along Piper Road to interconnect to Eversource's system from the proposed Project site.

The property is zoned as Office Park 2, along with the surrounding properties to the East and West. To the South is the Residence 2 zoning district. The Project obtained a zoning determination from the Acton Zoning Enforcement Officer to allow the Project to be permitted as a "Warehouse" use. The determination was appealed and subsequently upheld by the Acton Zoning Board of Appeals. See file titled **7.3. - Acton - Zoning Determination Appeal Dismissal**.

Please refer to the file titled **7.5. - Acton – FEMA Flood Map** for a depiction of mapped flood zones within the vicinity of the project. There is a mapped Zone A flood zone approximately 575' to the East of the Project site and overlaps with a small portion of the Eastern side of the property, with an approximate flood elevation of 152-153'. The Project site elevation is planned to be at a finished grade of 170.5', 17.5 feet above the mapped flood elevation to the East. Therefore, BlueWave views the proposed Project as avoiding material flood risk.

The Project is not located within any mapped MassDEP Zones I and II Groundwater Protection Zone.

Please refer to the file titled **7.5 - Acton - Wetland Delineation Report** dated 01/13/2022 for a map of onsite wetlands. Wetlands on the northern portion of the site were later found to further extend to the west, putting the interconnection work within the 100-foot buffer zone, and triggering the need for a notice of intent (NOI).

An existing conditions survey was also conducted, please refer to the file titled **7.5 - Acton -**

Existing Conditions Survey.

A Geotech survey was also conducted, please refer to the file titled **7.5 - Acton – Geotech Report**.

7.6 If the bidder does not have interconnection facilities site control describe the status of the plan to obtain that control.

For the Acton Project, Bidder has site control of the land up to the point of change of ownership with Eversource.

7.7 Provide a list of all the permits, licenses, and environmental assessments and/or environmental impact statements required to construct and operate the project and progress towards each of them to date. Along with this list, identify the governmental agencies and municipalities that are responsible for issuing approval of all the permits, licenses, and environmental assessments and/or environmental impact statements. If a bidder has secured any permit or has applied for a permit, please indicate this in the response.

Please refer to the file titled **7.7. - Acton - Permit Matrix**.

7.8 Provide the anticipated timeline for seeking and receiving the required permits, licenses, and environmental assessments and/or environmental impact statements. Include a project approval assessment which describes, in narrative form, each segment of the process, the required permit or approval, the status of the request or application and the basis for projection of success by the milestone date. All requirements should be included in the project schedule in Section 10.

Appropriate site diligence was conducted for the Acton Project ahead of and during permitting activities, including:

- Geotechnical investigation
- Wetland delineation
- Site survey
- Ambient sound measurements and project sound analysis
- Additional desktop screening and diligence for cultural resources or other environmental factors

The Acton Project has received all of its non-ministerial permits, including:

1. Acton Select Board Site Plan Review and Special Use Permit issued April 5, 2023
2. Acton Conservation Commission Order of Conditions issued March 24, 2023
3. Acton Board of Health Hazardous Materials Control Permit issued March 7, 2023

See folder under Acton Project attachments labeled “Attachment 4 – Project Zoning/Permits” for copies of all non-ministerial permits received. Under the Mass Leads Act of 2024, all permits associated with real property development were automatically extended for two (2) years. Therefore, the Acton Project’s permits are set to expire next year (Spring 2027) unless site work is undertaken. Under the current schedule, the Project anticipates achieving notice to proceed in the late Fall of 2026, well ahead of permit expirations.

The Project submitted a Project Notification Form to Massachusetts Historical Commission (MHC) in July 2022 and received no notification of additional action required from MHC. Given that the footprint of disturbance for the site is less than 1 acre, a Stormwater Pollution Prevention Plan (SWPPP) is also not anticipated to be required prior to submittal of building and electrical permits with the Town.

The Project anticipates submitting for building and electrical permits in the Fall of 2026 to achieve NTP by end-of-year. Additionally, Project documentation and materials reflecting finalized design are in the process of being prepared in order to submit to the Town Boards to satisfy and close out relevant permit conditions.

7.10 Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. Include information on specific host community and localized support and/or opposition to the project of which the bidder is aware. Provide copies of any agreements with communities and other constituencies impacted by the project. Provide a stakeholder map and a plan for community engagement activities and targeted stakeholder outreach.

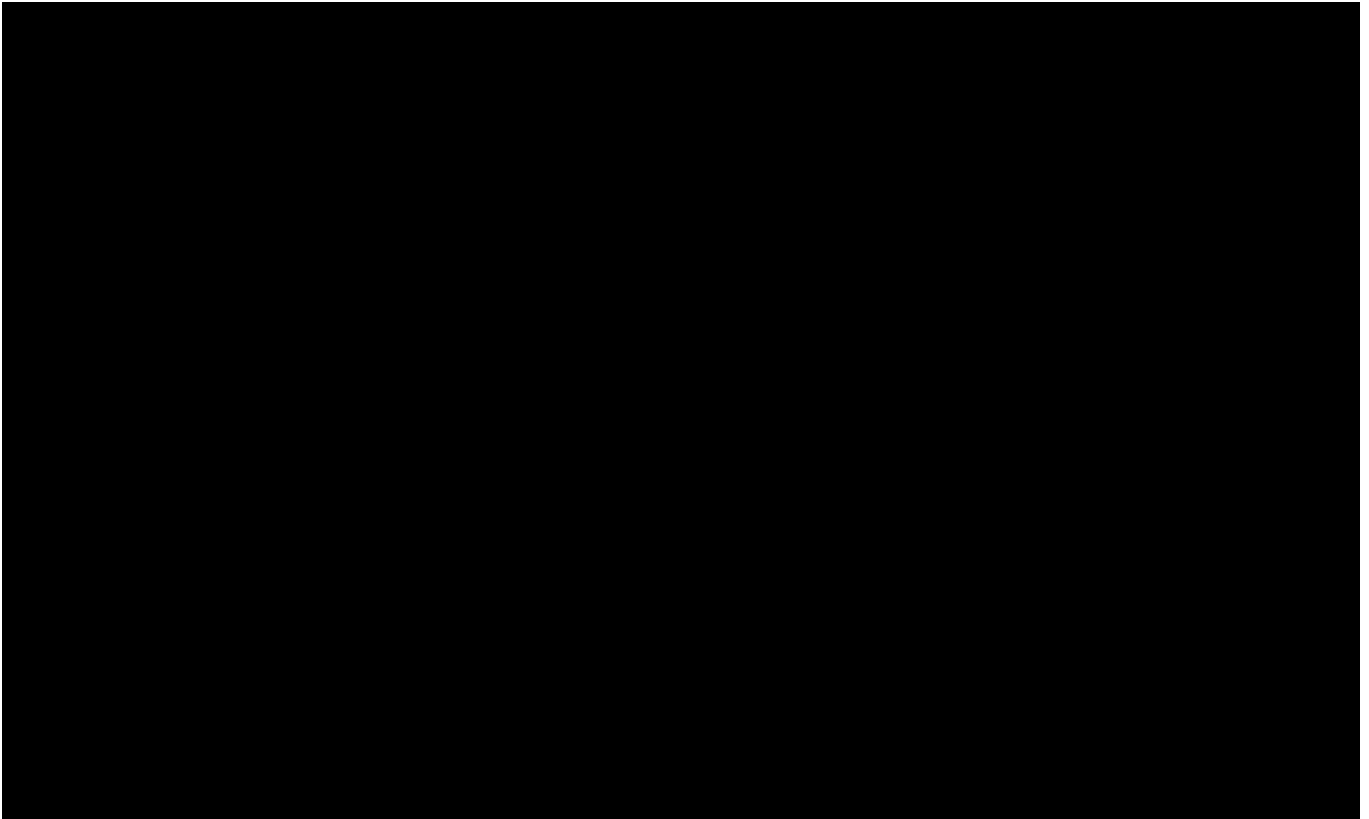
Below are further details on the Acton Project and associated community, and plans for further stakeholder outreach and engagement.

The Town of Acton is located in eastern Massachusetts, approximately 20 miles northwest of Boston. The Town has 24,021 residents as of the 2020 census, with a median age of 44.5 years. The closest mapped environmental justice community is approximately 2 miles to the east in Concord, MA. As of the 2024 ACS 5-year estimate, the median household income is \$158,230, compared to the state median income of \$104,828. The Town became a designated Green Community in 2010 and published its most recent Climate Action Plan in 2022, detailing its target to achieve Net Zero by 2030. As part of its Climate Action Plan, the Town has described goals to provide 100% of the town’s electricity supply through renewable energy, and to “maximize the installation of renewable energy and energy storage system wherever feasible on all municipal buildings.” Overall, the Town has clear goals and intentions to be a leader in clean energy.

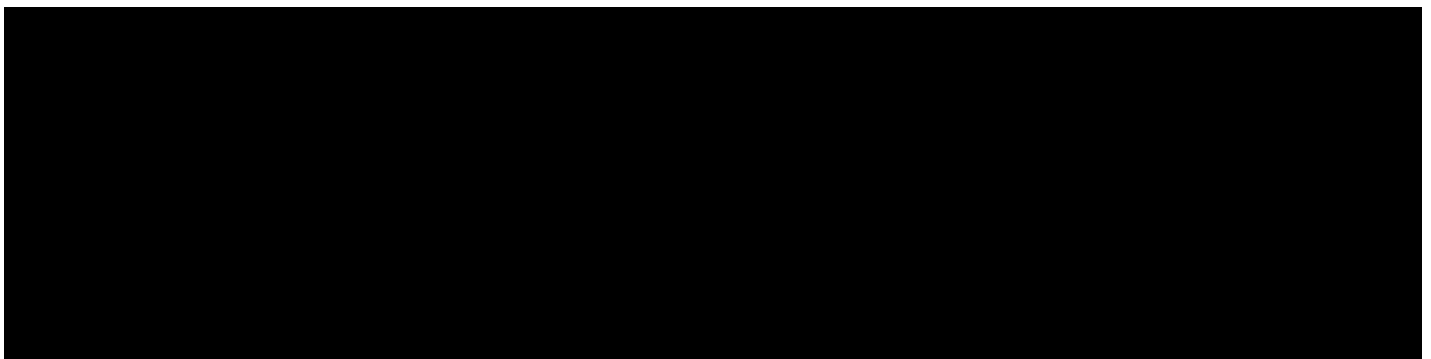
During permitting, Town staff were supportive of the Project, and there was a large amount of input and feedback on the permit application and Project design. Prior to permitting, BlueWave hosted a virtual community meeting for nearby residents; however, attendance was limited at the time. During permitting, residents from the neighborhood located directly south of the Project’s property organized in opposition to the Project. The public hearing process for the Project lasted nine (9) months, with each hearing well attended by the public. Concerns raised during permitting were common to battery energy storage systems, primarily focusing on safety of the system with respect to nearby residents. BlueWave expended significant effort and resources ensuring that all concerns

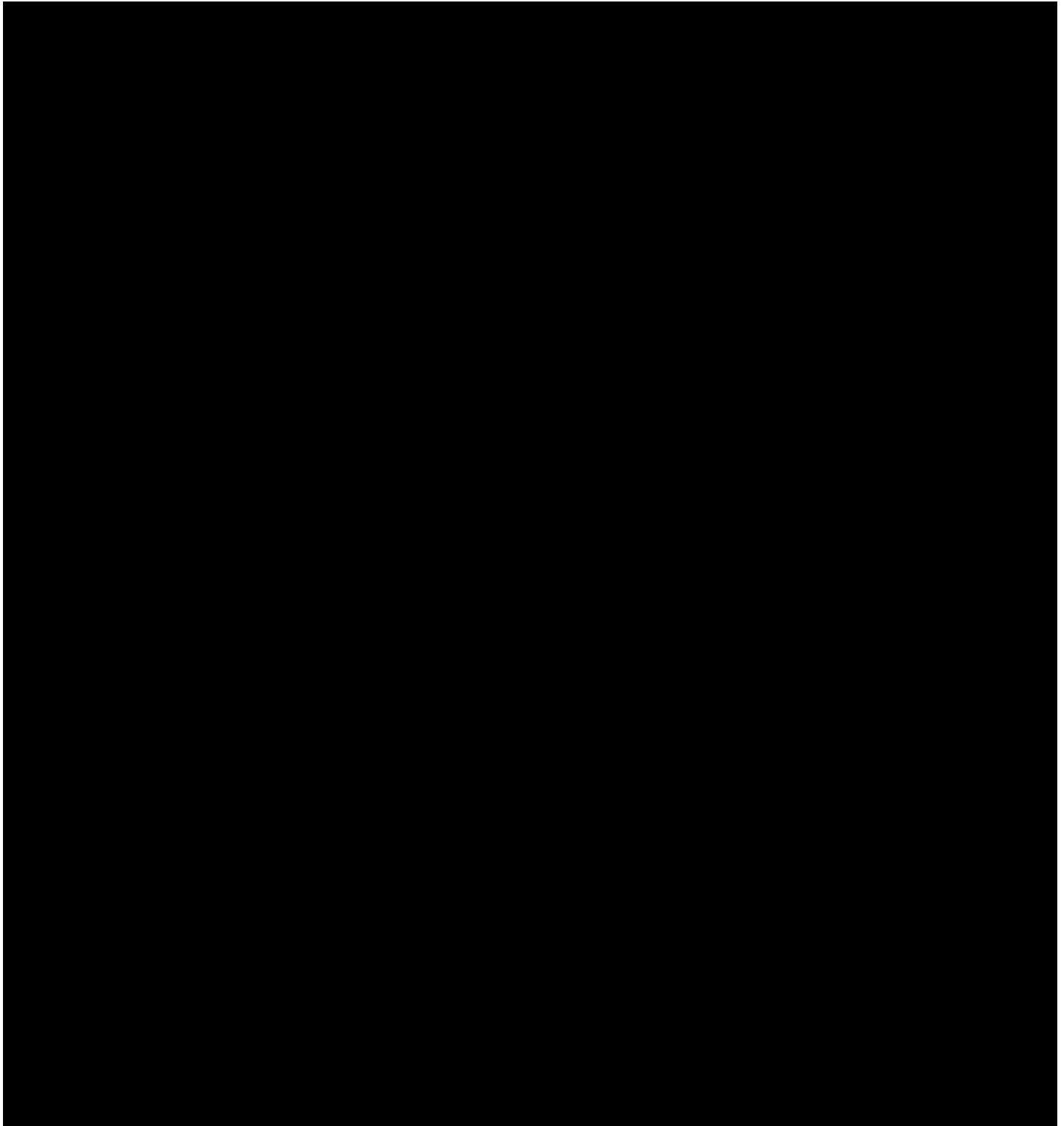
and questions raised regarding the Project were answered with concrete information and data, and detailed descriptions of the technology, how it is tested, and how the design of the site ensures the safety of nearby residents. The Project's Special Permit application was approved in April 2023. During this process, other Acton residents did voice support for the Project, pointing to the Town's goals and how these types of projects were necessary to support the growth of renewable energy.

Below is a map of primary identified stakeholders in the vicinity of the Acton project, including the residential neighborhood south of the Project:



Below is a community engagement plan broken out by project stage with a description of the anticipated outreach activities moving forward. Given that there has been a significant amount of time since the Project received its permits, BlueWave intends to host a pre-construction community meeting to address updates and changes to any information submitted at the time of permitting, and to detail how all of the permit conditions included in the issued permits will be satisfied.





Section A-8: Safety

Please answer the following questions in Section A-8 for each Transmission Project and Distribution Project being bid:

8.1 Please attach as detailed a safety plan as possible, given the stage of the project, which demonstrates compliance or intent to comply with all relevant federal, state, and local laws, codes, and standards. Safety plans must at a minimum comprise the following elements:

- i. Energy Storage System project drawings: Provide final, draft, or preliminary project drawings, including as much detail as known at the time of bid submission.

Please refer to the file titled **7.1. - Acton - Issued for Permit Site Plan.**

- iv. Hazard mitigation analysis: Provide a final, draft, or plans to develop a project site-specific Hazard Mitigation Analysis (HMA), addressing thermal runaway, mechanical failures, and other potential equipment failures.

- v. Emergency response plan: Provide a final, draft, or plans to develop a project site-specific Emergency Response Plan (ERP).

See Attachment **8.1.v. - Acton - Draft ERP** for Draft ERP. An updated site ERP will be prepared with the assistance of BlueWave's external fire safety consultant prior to issuance of building permits.

- vi. Safety training materials: Provide final, draft, or plans to develop project site-specific safety training materials.

For the Acton Project, BlueWave has engaged an external fire safety consultant who has prepared the site-specific ERP and will deliver the site specific HMA. They will also develop safety training materials that will be shared with the Town of Acton and utilized with the Acton fire department for on-site fire training before construction and after the Project is in operation. Fire safety training will also be ongoing, with refreshed training to be provided with the fire department at appropriately identified intervals or as staff changes necessitate ad-hoc training sessions. A copy of all safety training materials will be maintained at BlueWave, the Acton fire department, and then a physical copy will be maintained in an approved location near the Project or made available digitally (whichever is the preference of the Town of Acton).

8.9 The project is encouraged to include testimonials and statements of support from local governments and first responder organizations to demonstrate robust stakeholder communication and participation in the project's safety plan. Please also provide evidence of community engagement towards acceptance of the facility, or a plan to work towards such engagement and

acceptance.

As discussed earlier in the bid response form, the permitting of the Acton Project involved significant engagement with Town staff and community residents. The permit application proceeded through a formal peer review process, which was reviewed by both the Town Engineer and DPW department, as well as the Fire Department. During the Site Plan Special Permit public hearing process, the Select Board also regularly communicated with the Board of Health to discuss conversations held during meetings with the Board of Health as well as feedback received from residents in both permit review settings. BlueWave answered numerous questions regarding lithium-ion battery technology, safety practices, and specifically how the system could be safely built and operated at the proposed location. Town staff and officials were generally receptive to the Project, and robust discussion based on resident and town staff feedback resulted in the conditions attached to the Project's permits.

BlueWave intends to continue to foster community acceptance by engaging with the Town prior to submitting for building permits. As part of satisfying permit conditions, BlueWave will be submitted updated site plans, emergency response plans, and a Hazard Mitigation Analysis to the Town boards and department staff. BlueWave intends to discuss these documents in a public meeting forum such that members of the public can attend and be informed of the Project's progress and changes since its permits were issued. Furthermore, BlueWave intends to present on how systems such as these have operated across the Commonwealth in the time since the permits were issued, demonstrating the overall safety record and lack of negative impacts to public safety or health in the communities where these types of systems are present and operating.

Section A-9: Engineering and Technology; Commercial Access to Equipment

This section includes questions pertinent to the engineering design and project technology. This section must be completed for all aspects of a project including but not limited to the Energy Storage System and associated operational plan and interconnection facilities. Bidders should provide information about the specific technology or equipment including the track record of the technology and equipment and other information as necessary to demonstrate that the technology is viable.

Please answer the following questions in Section A-9 for each Transmission Project and Distribution Project being bid:

9.1 Provide a reasonable but preliminary engineering plan which includes the following information:

- iv. Status of acquisition of the equipment components, including whether orders are in place and/ or production slots secured



- v. Whether the bidder has a contract for the equipment. If not, describe the bidder's plan for securing equipment and the status of any pertinent commercial arrangements

Equipment has not yet been purchased. Please see section 11.3 for more detail.

Section A-10: Project Schedule

A bidder must demonstrate that its proposal can be developed, permitted, financed, and constructed and be technically viable within a commercially reasonable timeframe. The bidder is required to provide sufficient information and documentation that shows that the bidder's resources, process and schedule are adequate for the acquisition of all rights, permits and approvals for all aspects of the project and for the financing of the project consistent with the proposed project milestone dates.

Bidders are required to provide a complete critical path schedule for the project from the notice of selection of the project for contract consideration to the start of commercial operations. For each project element, list the start and end date. The proposal must include a schedule with reasonable detail that demonstrates that the bidder has provided sufficient time for the application for, and receipt of, necessary permits, approvals, other commitments, project financing, completion of design work, and equipment procurement and construction in order to credibly complete the project reasonably consistent with the proposed Commercial Operation Date, meaning that the project is more likely than not to come online by the date that is projected within the proposal. If a bidder is developing the project in phases, it should include a schedule for each phase. For Transmission Projects, the bidder should include critical milestones in its markup to the Form LTC that are consistent with its proposal and are reasonably achievable.

Please answer the following questions in Section A-10 for each Transmission Project and Distribution Project being bid:

10.1 Identify the elements on the critical path. The schedule should include, at a minimum, preliminary engineering, financing, acquisition of real property rights, Federal, state and/or local permits, licenses, environmental assessments and/or environmental impact statements (including anticipated permit submittal and approval dates), completion of interconnection studies and approvals, procurement, facility contracts, start of construction, construction schedule, and any other requirements that could influence the project schedule and the commercial operation date.

Please refer to the file titled **10.1. - Acton - Project Schedule**

See attached Project schedules provided. Critical path elements completed and planned include:

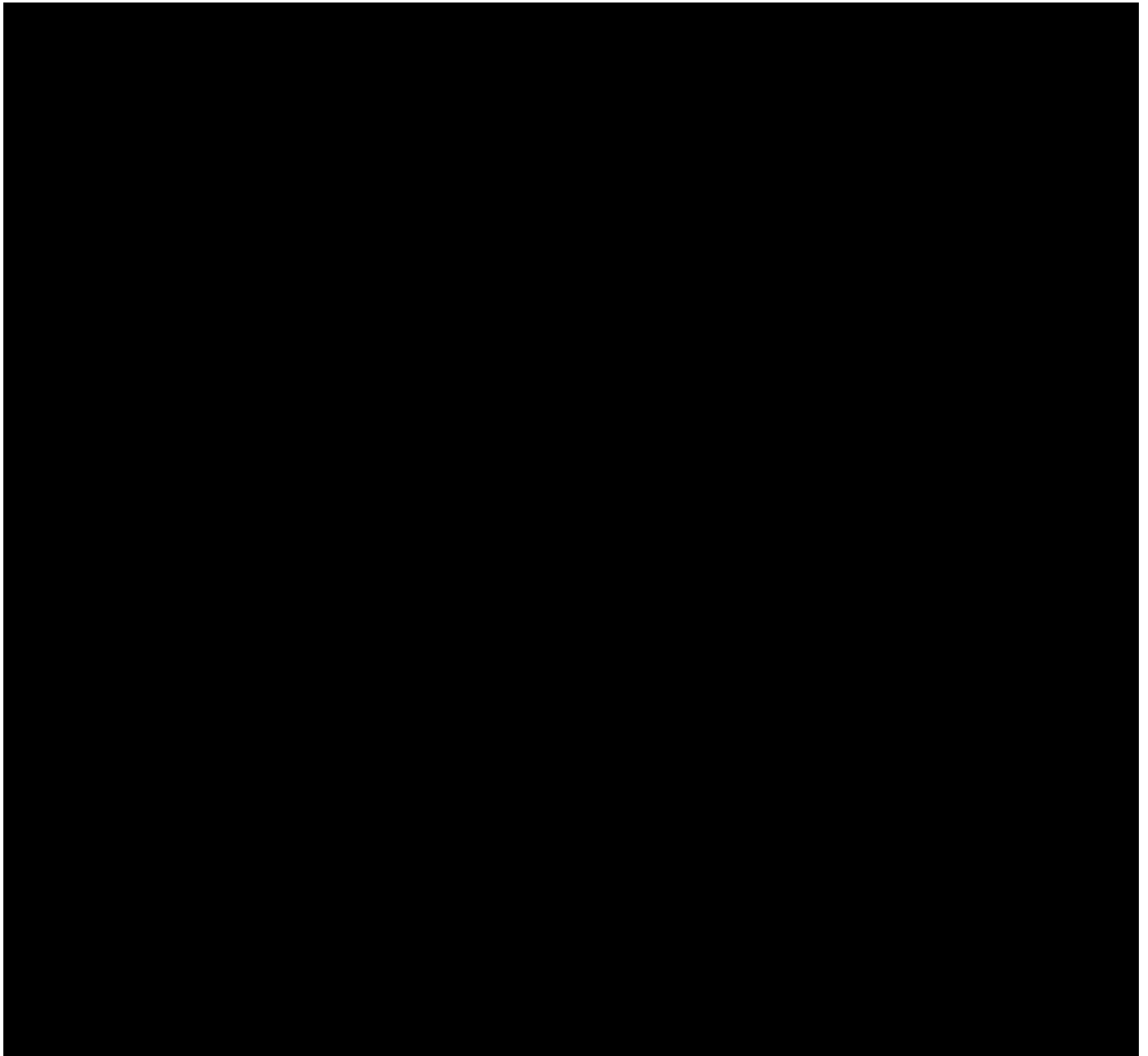
1. Execution of Long Term Lease (completed)
2. Preliminary Engineering / 30% Designs (completed)
3. Local Permits (completed)
4. Environmental Due Diligence (completed)
5. Interconnection Studies (completed)
6. Interconnection Services Agreement (completed)
7. IFC Design (in process)
8. Material procurement and vendor activity (in process and planned)
9. Construction and Tax Equity Financing (planned)
10. Start of Construction (planned)

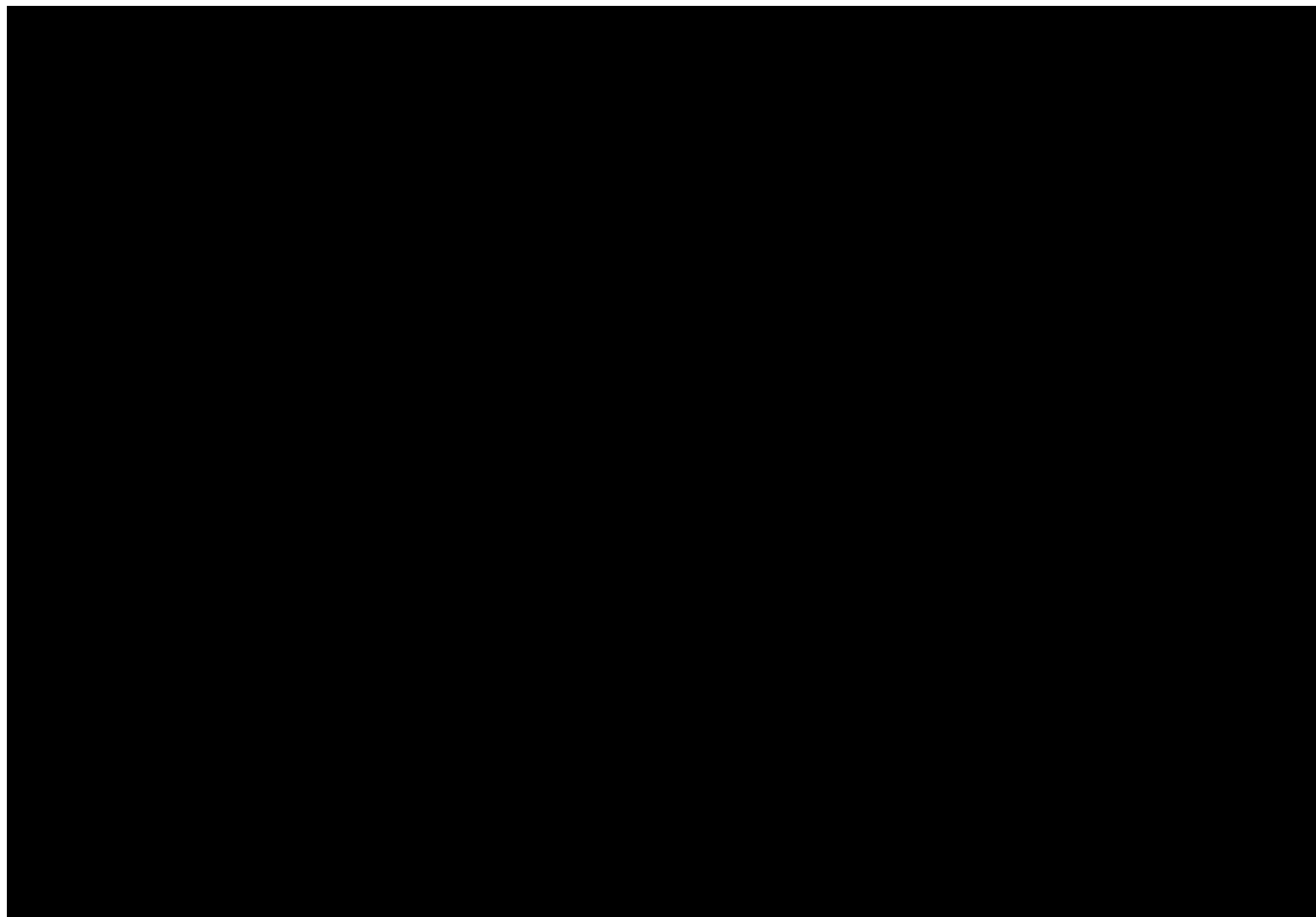
10.2 Describe and demonstrate that the project is more likely than not to come online by the

commercial operation date that is projected within the proposal, as evidenced by documents filed by the bidder showing the following:

- i. Commencement of permitting processes;
- ii. A plan for completing all permitting processes;
- iii. Environmental assessment;
- iv. Viable financing plans along with detailed information requested in Section 2.2.2.4;
- v. Viable installation and electrical interconnection plans
- vi. Material progress towards the acquisition of all real property rights; and
- vii. Evidence of material vendor activity.

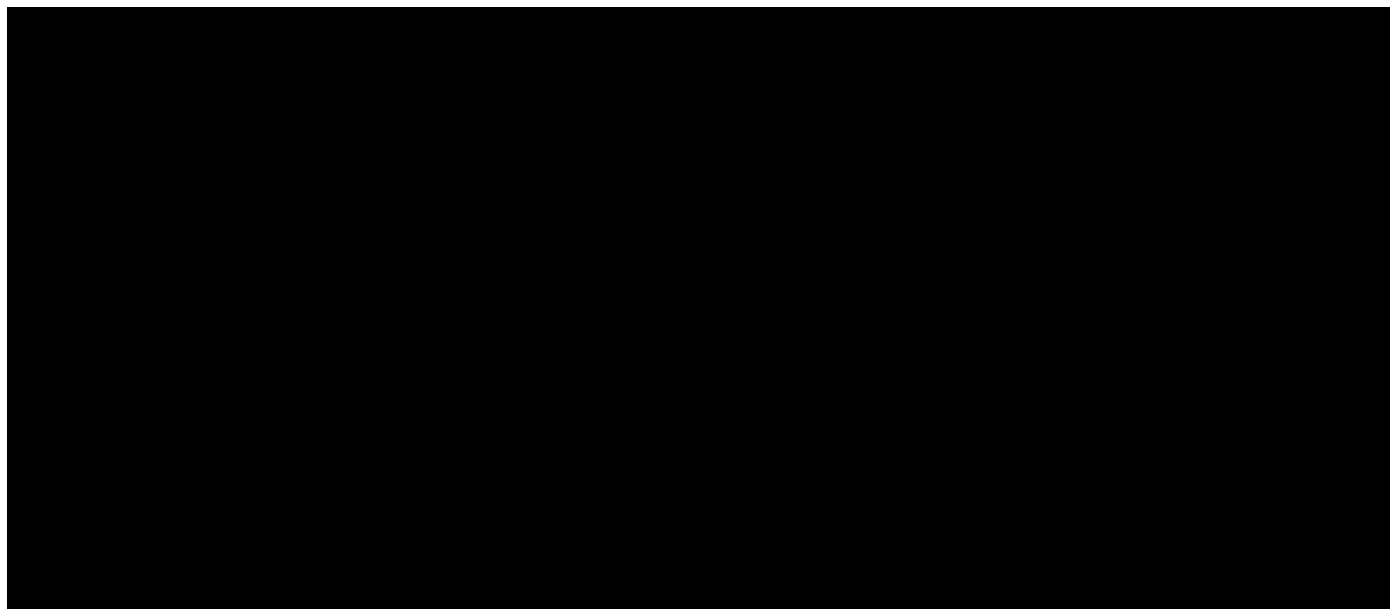
See below for a demonstration on how the Acton Project is more likely than not to come online by the COD.





10.3 Detail the status of all critical path items, such as receipt of all necessary siting, environmental, and ISO-NE or interconnecting Distribution Company approvals.

Below is a status of all critical path items for the Acton Project.



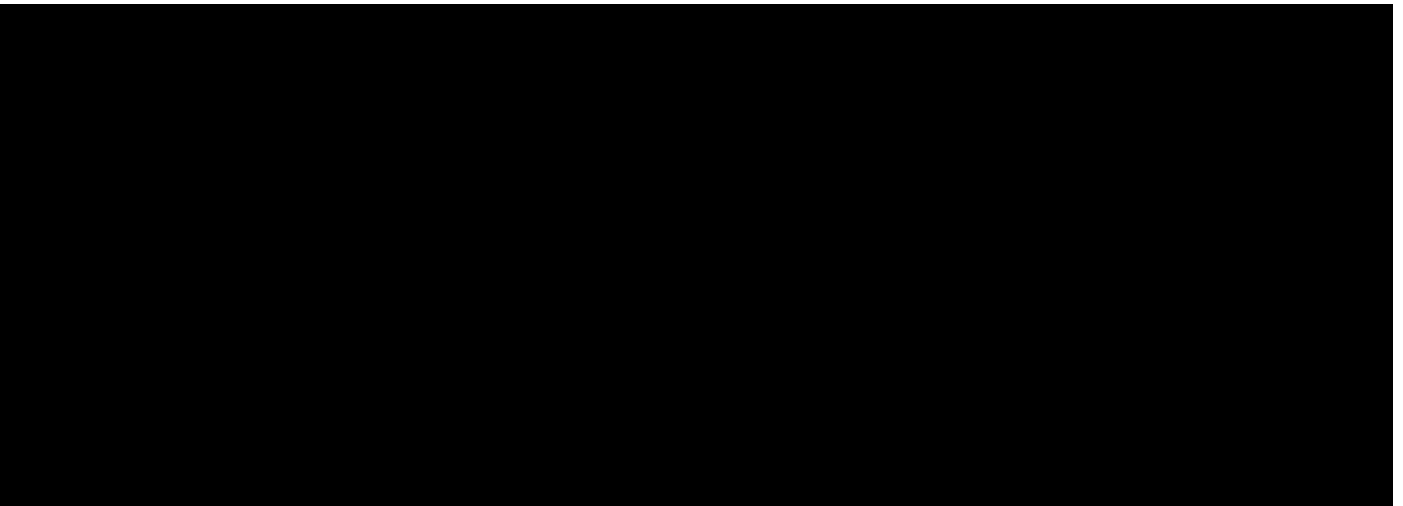


Section A-13: Project Management and Experience

Bidders are required to demonstrate project experience and management capability to successfully develop and operate all aspects of the project proposed. The Evaluation Team is particularly interested in project teams that have demonstrated success in projects of similar type, size and technology and can demonstrate an ability to work together effectively to bring the project into commercial operation in a timely fashion.

For all project-specific questions in Section A-13, if bidding in multiple Transmission Projects or Distribution Projects, please answer each question for each Transmission Project or Distribution Project being bid.

- 13.6 With regard to the bidder's project team, identify and describe the entity responsible for the following, as applicable:



Section A-14: Economic Development and Employment Benefits, Transitioning Fossil Fuel Communities, Benefits to Low Income Ratepayers and Environmental Justice Communities, and Other

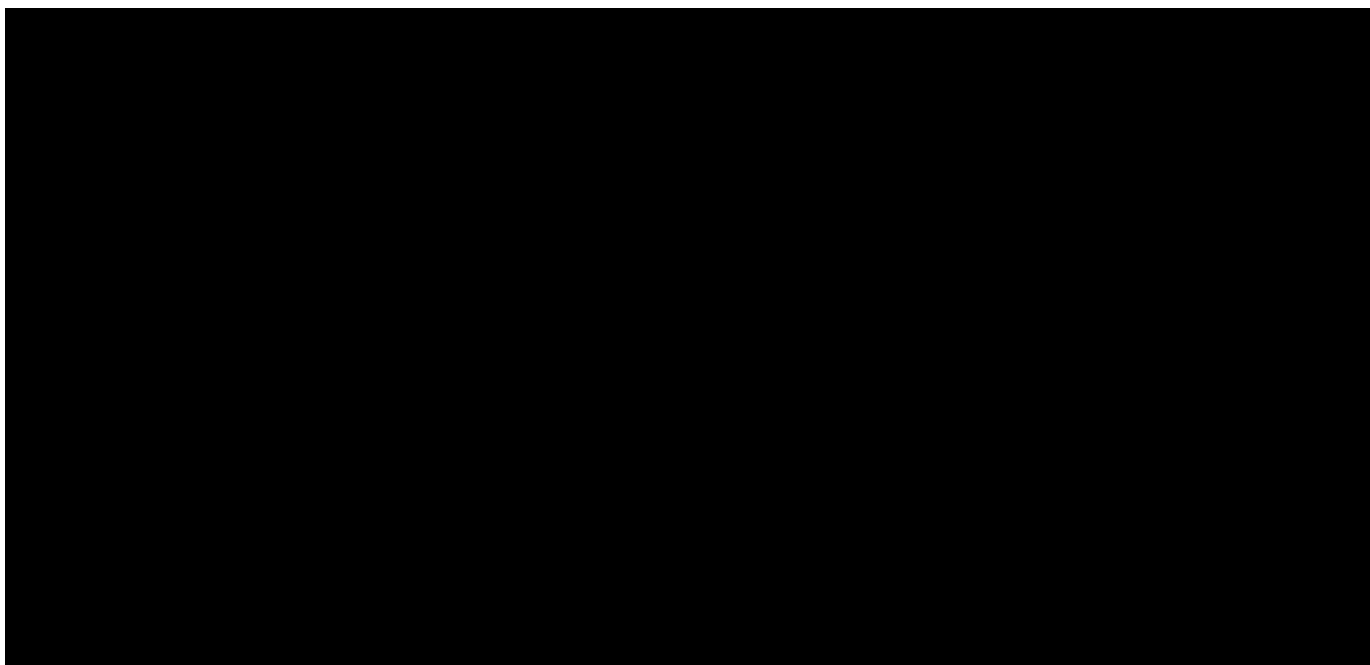
For all project-specific questions in Section A-14, if bidding in multiple Transmission Projects or Distribution Projects, please answer each question for each Transmission Project or Distribution Project being bid:

14.1 Please provide an estimate of the number of jobs to be created directly during project development and construction, and during operations, and a general description of the types of jobs created, duration of employment, estimated annual compensation, the employer(s) for such jobs, and the location. Employment impacts should be broken out by state and the region as a whole and highlight any impacts in economically distressed areas, including former fossil fuel communities. Please treat the development, construction, and operation and maintenance periods separately in your response. All information provided must be measurable.

The table below provides estimates of the number of jobs supported during the development, construction, and operations of the proposed Acton Project. Job estimates are based on final total expected development, construction, and operational expenditures and typical needs. These estimates also account for some jobs being pulled from outside the state to meet total labor needs across the Project’s lifecycle. Acton is not an Economically Distressed Community as defined by the State of Massachusetts, nor is it located in or adjacent to any former fossil fuel communities.

14.5 Please describe and quantify any other economic activity or development expected to result directly from the proposed project. Impacts should be broken out by state and the region as a whole and highlight any impacts in economically distressed areas or former fossil fuel communities. Direct economic activity/development will be evaluated based on scale relative to project size, credibility and firmness. Preference will be given to commitments that secure long-term benefits; begin to provide benefits during project development, construction, installation, and the first five years of operations; direct benefits to Environmental Justice populations and host communities.

The table below provides a high-level estimate of the amount of potential economic activity expected to result from the Project across the state and region, between each phase of the Project. These numbers are based on the estimated amount of labor identified in Section 14.1, and broad assumptions on induced economic activity outputs for construction and operational labor. Some conservativeness has been applied to the final estimates as the Project has not executed its final contracts.



14.13 Please describe extent to which the project demonstrates that it avoids, minimizes, or mitigates, to the maximum extent practicable, environmental impacts. Preliminary characterization of the potential environmental impacts facility and other infrastructure from pre-construction through the duration of the project,

The Acton Project does not overlap any mapped priority habitat of rare species as identified by NHESP. The site, as with most proposed sites in Massachusetts, does overlap with mapped Long-Eared Bat potential habitat range per the US Fish & Wildlife IPaC reporting tool. Proper periods for tree clearing will be followed to ensure no disturbance to any possible nesting or breeding activity, and a survey for possible bat hibernacula will be conducted prior to construction activity, if determined as needed. The Project is not in a mapped FEMA Flood Zone, nor is it located in a mapped Zone II Groundwater Protection Zone. Onsite wetlands have been delineated, and a portion of the Project's footprint will fall within the 100-foot wetland

buffer. The work proposed in the buffer zone is occurring within an already disturbed/developed area (the Discovery Way access road) and has been permitted with the Town of Acton Conservation Commission. The Project's Order of Conditions contains general and special conditions intended to minimize impact to any natural resources within the buffer zones.

Pre-construction, site disturbance will be minimal, apart from certain site diligence conducted to-date and planned during development (e.g. test pits for geotechnical due diligence). During construction, all appropriate erosion control measures and stormwater management best practices will be observed to avoid any impacts to onsite wetlands. Stormwater BMPs will be constructed to meet Massachusetts DEP standards for runoff treatment and management during operation of the Project. Overall, the Project footprint is proposed immediately adjacent to the existing parking lot of the office building at 100 Discovery Way. This fact, combined with the relatively small overall site footprint, limits the amount of work and any additional tree clearing required to construct the Project, thereby avoiding additional natural resource impact. BlueWave worked with the landowner to identify the best possible mutually agreeable location on-site that would minimize impact from construction of the Project.

No other material impacts on environmental resources are expected to occur from the construction and operation of the Project.

14.14 Please describe extent to which the project demonstrates that it avoids, minimizes, or mitigates, to the maximum extent practicable, negative impacts on Environmental Justice populations and host communities, and extent to which the project directs positive benefits from the project to those communities.

The Acton Project demonstrates that it specifically avoids, minimizes and mitigates to the maximum extent practicable impacts on Environmental Justice populations and host communities in a few manners. (Below is in addition to the actions BlueWave takes on all of its projects, including the Acton Project. See the Portfolio bid response 14.14 for more information.)

1. Noise Impacts

During its permitting process, ambient sound levels were measured at the Acton Project site and projected equipment sound levels were modeled. Based on measured sound levels and equipment data, sound mitigation would be required to maintain sound levels within allowable regulatory limits, primarily along the southern edge of the system footprint toward the residential neighborhood off property to the south. The Project's inherent design, which involves installation of a retaining wall, will serve as the primary sound barrier to meet mitigation needs. Additional sound barrier material will be installed along the remaining perimeter of the site as needed, and sound levels will be measured during operation to ensure that any measured impacts are properly mitigated.

2. Fire Safety

During permitting the site developed a site-specific ERP that will be updated prior to construction start. Additionally, an updated site-specific HMA will be conducted based on final system specifications to ensure that the site meets NFPA code and properly accounts for and mitigates any

perceived fire safety risks or impacts on-site. Current design provides appropriate setbacks from property lines and additional buffer from the new tree line once constructed. Access for first responders is readily available from Discovery Way through the existing parking lot of the 100 Discovery Way office building.

3. Visual Impact

During permitting, neighbors of the property and the Town boards raised concern over possible visual impacts from installation of the system to the southern neighbors. To mitigate this concern, the Project will provide additional tree plantings to generate screening. These trees will be planted in an already vegetated area, blending into the existing landscape while ensuring that perceived negative impacts on visual sightlines are avoided.