

**CANAL ENERGY STORAGE PROJECT
SECTION 83E ROUND 2 BIDDER
RESPONSE**

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Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

LIST OF ACRONYMS

Acronym	Meaning
AC	Alternating current
ACEC	Area of Critical Environmental Concern
AGL	Above ground level
AHJ	Authority Having Jurisdiction
ANSI	American National Standards Institute
API	Application programming interface
BA	Burdened Area
BAA	Balancing Authority Area
BBSO	Safety-performance metric; not expanded in the document
BESS	Battery energy storage system
BMP	Best Management Practice
BMS	Battery management system
CCGT	Combined-cycle gas turbine
CCIS	Capacity Capability Interconnection Standard
CCS	Carbon capture and storage
CEIF	Clean Energy Infrastructure Facility
CESP	Canal Energy Storage Project
CFR	Code of Federal Regulations
CGP	Construction General Permit
CMR	Code of Massachusetts Regulations
CNR	Capacity Network Resource
CNRIS	Capacity Network Resource Interconnection Service
COD	Commercial Operation Date
CPEC	Clean Peak Energy Certificate
CPPD	Certification Project and Pricing Data
CPS	Clean Peak Energy Standard

Acronym	Meaning
CT	Combustion turbine
CWA	Clean Water Act
DC	Direct current
█	█
DOER	Massachusetts Department of Energy Resources
DPP	Division of Public Participation
DPU	Massachusetts Department of Public Utilities
DRI	Development of Regional Impact
EFSB	Energy Facilities Siting Board
EJ	Environmental Justice
EMF	Electric and magnetic fields
EMS	Energy management system
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
EPC	Engineering procurement and construction
ERCOT	Electric Reliability Council of Texas
ERP	Emergency Response Plan
ESA	Endangered Species Act
ESG	Environmental social and governance
█	█
FAA	Federal Aviation Administration
FEED	Front-End Engineering Design
FEMA	Federal Emergency Management Agency
FEOC	Foreign entity of concern
FERC	Federal Energy Regulatory Commission
FFE	Fossil Fuel Employment
GHG	Greenhouse gas
GIS	Generation Information System; also Geographic Information System in MassGIS
GSU	Generator step-up transformer
GWh	Gigawatt-hour
HMA	Hazard Mitigation Analysis
HR	Human resources

Acronym	Meaning
HV	High voltage
HVAC	Heating ventilation and air conditioning
IEEE	Institute of Electrical and Electronics Engineers
IRA	Inflation Reduction Act
ISO	Independent System Operator
ISO-NE	ISO New England
ITC	Investment Tax Credit
IWPA	Interim Wellhead Protection Area
kV	Kilovolt
LC	Letter of credit
LCEIF	Large Clean Energy Infrastructure Facility
LCESF	Large Clean Energy Storage Facility
LCP	Local Comprehensive Plan
██████	██
LLC	Limited liability company
LNTP	Limited notice to proceed
LTC	Long-Term Contract
LTSA	Long-Term Services Agreement
MassCEC	Massachusetts Clean Energy Center
MassDEP	Massachusetts Department of Environmental Protection
MassGIS	Massachusetts Geographic Information System
MEPA	Massachusetts Environmental Policy Act
MES	MES screening tool; not expanded in the document
MESA	Massachusetts Endangered Species Act
MGL / M.G.L.	Massachusetts General Laws
MHC	Massachusetts Historical Commission
██████	██
MOU	Memorandum of Understanding
MPH	Miles per hour
MV	Medium voltage
MW	Megawatt
MWh	Megawatt-hour
NEPOOL	New England Power Pool

Acronym	Meaning
NFPA	National Fire Protection Association
NHESP	Natural Heritage and Endangered Species Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRIS	Network Resource Interconnection Service
NWP	Nationwide Permit
O&M	Operation and maintenance
OBBA	One Big Beautiful Bill Act
OEJE	Office of Environmental Justice and Equity
OEM	Original equipment manufacturer
OSHA	Occupational Safety and Health Administration
PCS	Power conversion system
PEA	Permit Enforcement Agency
PFE	Prohibited foreign entity
PILOT	Payment in Lieu of Taxes
PJM	PJM Interconnection
PNF	Project Notification Form
POI	Point of interconnection
PPA	Power Purchase Agreement
PPE	Personal protective equipment
PPSWA	Potential Public Water Supply Area
PSCAD	Power Systems Computer Aided Design
PSS/E / PSSE	Power System Simulator for Engineering
PTF	Pool Transmission Facility
PV	Photovoltaic
PWA	Prevailing wage and apprenticeship requirements
QP	Queue position
RFP	Request for proposals
RPP	Regional Policy Plan
RPS	Renewable Portfolio Standard

Acronym	Meaning
SCADA	Supervisory control and data acquisition
SCEIF	Small Clean Energy Infrastructure Facility
SDO	Massachusetts Supplier Diversity Office
SEMA	Southeastern Massachusetts
SIS	Surplus Interconnection Service
SOC	State of charge
SPCC	Spill Prevention Control and Countermeasure
SPV	Special purpose vehicle
SWPPP	Stormwater Pollution Prevention Plan
TCS	Transmission Cluster Study
TL	Term loan
TLB	Term Loan B
TMP	Traffic Management Plan
TRIR	Total Recordable Incident Rate
UL	Product-safety certification and standards organization
UPS	Uninterruptible power supply
US / U.S.	United States
USACE	United States Army Corps of Engineers
USD	United States dollars
USFWS	United States Fish and Wildlife Service
WPA	Massachusetts Wetlands Protection Act
WQC	Water Quality Certification

SECTION A-1: CERTIFICATION, PROJECT, AND PRICING DATA

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.

Please see Attachment A-1 - CESP - Certification, Project and Pricing Data.

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.

The Canal Energy Storage Project (“the Project”) is a new 210 megawatt (MW) / 840 megawatt-hour (MWh), four-hour, front-of-the-meter lithium-ion battery energy storage system (BESS) proposed at the existing Canal Generating Station, 9 Freezer Road, Sandwich, Massachusetts. The Project will use a Surplus Interconnection Service (SIS) configuration associated with Canal Generating Station’s existing Unit 2 (“Canal Unit 2”) and will interconnect on the high-voltage side of the existing unit main power transformer through a new 34.5 kilovolt (kV) collector system and dedicated 34.5/345 kV generator step-up transformer. The proposed Guaranteed Commercial Operation Date (COD) is January 1, 2031.

[REDACTED]

The Project is proposed by Canal Energy Storage LLC (the “Bidder”), which is a special purpose vehicle (SPV) 100% owned by JERA Americas Inc. (“JERA” or “the Sponsor”). The Sponsor, through 100%-owned subsidiaries, also owns Canal Generating LLC, which owns the site and interconnection facilities proposed to be used by the Project.

[REDACTED]

Table 2-1 - Project Attributes

Attribute	Project Details
Bidder (SPV)	Canal Energy Storage LLC
SPV Owner / Sponsor	JERA Americas Inc. through 100% owned subsidiaries
Project Location	9 Freezer Road, Sandwich, Massachusetts
Interconnection Location	Canal 345 kV POI 111193
Interconnection Configuration	Surplus Interconnection Service
ISO-NE Operational Configuration	Continuous Storage Facility
Power Capacity	210 MW
Energy Capacity	840 MWh
Guaranteed COD	January 1, 2031
██████████	██████████
Project Technology	Lithium-ion battery energy storage system

[illegible]

Project Value and Operating Proposition

The Project offers a combination of ratepayer value, execution maturity, and Commonwealth benefits. The Project will operate as an ISO-NE Continuous Storage Facility and will participate in Day-Ahead and Real-Time Energy, operating-reserve, and frequency regulation markets to the extent eligible. The Sponsor will retain responsibility for charging, dispatch, wholesale-market participation and delivery performance. Operations will

prioritize safety and reliability requirements, ISO-NE and Transmission Owner instructions, equipment and interconnection limits, maintenance of sufficient state of charge to satisfy the contracted CPEC obligation, and optimization of retained wholesale-market revenues.

The Distribution Companies will therefore receive the contracted Environmental Attributes without bearing energy-market, charging-cost, or ancillary-service risk. The proposed price will be firm and payment will be made only for qualifying CPECs actually delivered.

[REDACTED]

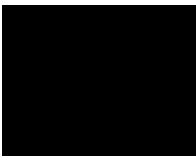
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

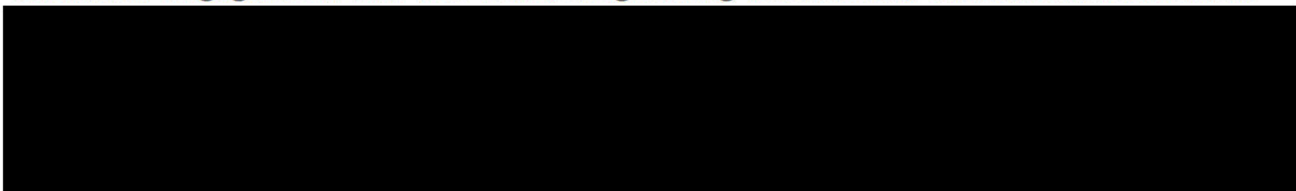


Development expenditures are being funded with sponsor equity. Construction funding is expected to be 100% Sponsor-provided equity with nonrecourse debt arranged at or after COD. The Long-Term Contracts (LTCs) will provide a predictable CPEC revenue stream that supports financing while the Sponsor retains merchant-market exposure and associated operating risk. Section 5 describes financial strategy for the Project.

Safety, Community and Commonwealth Benefits

The Project will be designed, constructed, and operated in accordance with applicable Massachusetts requirements and recognized battery-storage safety standards, including the applicable editions of NFPA 855, UL 9540 and UL 9540A. The Project will implement site-specific fire-protection, emergency-response, responder-training and incident-communication procedures in coordination with the Town of Sandwich and local first responders.

The Sponsor's existing ownership of the Canal Generating Station provides a foundation for continued engagement with the Town, neighboring businesses, educational institutions



presents the integrated schedule for interconnection, permitting, financing, procurement, construction, energization, commissioning, and achievement of the Guaranteed Commercial Operation Date.



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:

- i. Identify if New or Existing Facility, or an upgrade to Existing Facility: New 210 MW/ 840 MWh Battery Energy Storage System utilizing SIS at the existing point of interconnection (POI) associated with Canal Unit 2
- ii. Technology Type (e.g., mechanical, chemical, thermal): Chemical
- iii. Technology Description (e.g., battery chemistry, thermal storage medium): Lithium-ion battery
- iv. Point of Interconnection Deliverability Restrictions (if any): No material restrictions have been identified in studies independently commissioned by the Sponsor; final operating limits remain subject to confirmation by ISO-NE and Transmission Owner.
- v. Nameplate MW AC (at 100% project completion): 210 MW
- vi. Net Contract MW AC (at 100% project completion): 210 MW
- vii. Charge rate (MW): 210 MW
- viii. Discharge rate (MW): 210 MW
- ix. Storage Energy (MWh): 840 MWh
- x. Discharge Duration at Full-Rated Capacity (hours): 4 hours
- xi. Charging Efficiency (%): [REDACTED]
- xii. Discharging Efficiency (%): [REDACTED]
- xiii. Round Trip Efficiency (%): [REDACTED]
- xiv. Other Characteristics of your system, including, if applicable, but not limited to: Depth of Discharge (%), Full Duty Cycle, etc.: The Project will provide 840 MWh of contractual usable energy at the point of interconnection. The project design will incorporate operating a State of Charge (SOC) window and augmentation requirements to preserve full 210 MW / 4-hour capability with flexible duty cycles over the contract period.
- xv. Max/ Min cycles per year, season, and per day: Up to 365 equivalent full cycles per contract year and up to two cycles per day.

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.

The Project is a 210 MW / 840 MWh, four-hour Continuous Storage Facility. It will be available for coordinated charging, discharging, standby, and ancillary-service operation on a 24-hour basis. The Project's operation will be subject to available state of charge, annual warranted throughput, typical maintenance and outage schedule, interconnection limits, and ISO-NE instructions.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

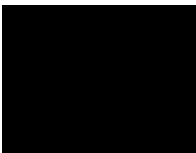
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

The Project is located within the approximately ~29-acre Canal Generating Station property at 9 Freezer Road in Sandwich, Massachusetts, near the eastern end of the Cape Cod Canal. The existing station is an established industrial power-generation site with road access, a 345 kV interconnection, operating personnel, security, and utility infrastructure. The existing Canal Generating Station is a 1,458 MW station comprising Units 1, 2, and 3, each with an independent POI.

The Project will use a Surplus Interconnection Service (SIS) configuration associated with Canal Unit 2 and will interconnect on the high-voltage side of the existing unit main power transformer through a new 34.5 kV collector system and dedicated 34.5/345 kV generator step-up transformer.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

iii. How the location of the Energy Storage System may impact the operation of fossil-fuel based generators (e.g. reduced ramping, peaker displacement, etc.)

[REDACTED]

When charged during renewable-rich hours and discharged during higher-load hours, the Project will reduce the dispatch and starts of marginal fossil generation; lower the need for thermal ramping; and provide regulation and reserve response with no direct onsite

¹ Based on ISO-NE’s 2030 PSSE Base Case
² Vineyard Wind 1: <https://www.vineyardwind.com/vineyardwind-1>
³ New England Wind 1: <https://www.newenglandwind1.com>

combustion emissions. [REDACTED]

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

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

The location was selected to use an existing major power-generation site and corresponding 345 kV infrastructure, and the Project will interconnect using SIS. Independent steady-state, stability, and short-circuit studies conducted by [REDACTED] have not identified transmission network upgrades required for the proposed SIS configuration [REDACTED]). Reusing the existing infrastructure reduces cost, schedule risk, land disturbance, and the need for new linear transmission construction. The Project also places fast-ramping capacity in southeastern Massachusetts, where it can support Cape Cod's reliability and future integration of offshore and regional renewable generation.

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

The Project will use [REDACTED]

The AC collection concept consists of modular battery blocks and bidirectional inverters connected to a 34.5 kV collector system, a dedicated 34.5/345 kV generator step-up transformer, a 345 kV breaker, revenue metering, station service, plant controller, supervisory control and data acquisition, protection, telecommunications, and cybersecurity systems. The inverter controls will provide four-quadrant active and reactive power capability within the equipment capability curve, voltage and power-factor control, automatic and manual ramp-rate controls, ride-through functions, and the telemetry required for ISO-NE dispatch and regulation qualification.

3.5 Describe the viability and operational reliability of the proposed technology and track record of the manufacturer. Provide examples of similar applications of the same size

and scope and evidence of meeting operational delivery plans in other energy storage projects.

Lithium-ion BESS technology is commercially mature and widely deployed for four-hour resource-adequacy, energy-shifting, reserve, and regulation duty. The proposed system uses modular, factory-integrated equipment so individual blocks can be isolated for maintenance while the balance of the plant remains available. Availability is supported by redundant block-level architecture, continuous cell and enclosure monitoring, active thermal management, remote diagnostics, preventive maintenance, spares, and a planned augmentation program.

[REDACTED]

[REDACTED]

[REDACTED]

3.6 Please provide an Environmental Attribute delivery plan and a charge/discharge profile for the proposed project, including supporting documentation. This documentation may be either an hourly storage use schedule or planned charge and discharge schedule. In your plan, please account for forecasted weather data and market assumptions over the life of the proposed contract. The energy production/delivery profile must provide the expected Generation to be delivered into the ISO-NE market settlement system by the Energy Storage System to allow the Evaluation Team to determine the reasonableness of your projections. Such information should be consistent with the charge/discharge profile provided above and also considering any and all constraints to physical delivery into ISO-NE. Describe the operation of the Energy Storage System, including whether the proposed Energy Storage System will be classified as a Binary Storage Facility or Continuous Storage

⁴ Green River Energy Center: <https://www.rplusenergies.com/green-river-energy-center>

⁵ Nighthawk Energy Storage: <https://www.nighthawkenergystorage.com/about-the-project/>

⁶ Cranberry Point Energy Storage: <https://cranberrypointenergystorage.com>

Facility, the designation of the ISO-NE Markets that the Energy Storage System would participate in, and the plan to operate in multiple ISO-NE Markets.

The Project will be modeled and operated as an ISO-NE Continuous Storage Facility with coordinated generator and dispatchable charging components. The base CPEC profile assumes charging during the renewable-energy windows permitted by 225 CMR 21.00 (Energy Storage Charging Windows) and discharging during the applicable four-hour Seasonal Peak Period on Business Days. The dispatch model will use hourly weather, renewable output, ISO-NE load, locational marginal price, reserve/regulation price, forced-outage, auxiliary-load, efficiency, and interconnection assumptions over the contract term.

[REDACTED]

[REDACTED]

The hourly charge/discharge and CPEC production profile are contained in the CPPD shared in Attachment A-1.

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 to operate primarily to store and discharge renewable energy. Specifically, please describe any co- 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.

If the project is ineligible for the CPS, please state the reason.

The Project will seek and maintain a DOER Statement of Qualification as a Qualified Energy Storage System. Because it is not proposed as physically co-located or contractually paired with a Qualified RPS Resource, the planned qualification pathway is charging coincident with periods of typically high renewable-energy production (Energy Storage Charging Windows) under 225 CMR 21.05(1). The current rule recognizes both wind-based charging from 12:00 a.m. to 6:00 a.m. in every season and seasonal solar-based charging windows: 8:00 a.m.-4:00 p.m. in spring, 7:00 a.m.-2:00 p.m. in summer, 9:00 a.m.-3:00 p.m. in fall, and 10:00 a.m.-3:00 p.m. in winter.

The energy-management system will tag and retain interval-level charging and discharging records, enforce the applicable charging-window logic, and produce the audit trail required

by DOER, MassCEC, and NEPOOL GIS. The Project will register in the Massachusetts Production Tracking System and NEPOOL GIS, obtain a Clean Peak identification number, complete meter/API testing, and report 15-minute interval performance through the MassCEC reporting platform.

[REDACTED]

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.

[REDACTED]

[REDACTED]

3.9 Maintenance Outage Requirements – Specify partial and complete planned outage requirements in weeks or days for all generation facilities and associated facilities required for the delivery of energy from the generation facilities to the delivery point. Also, list the number of months required for the cycle to repeat (e.g., list time interval of minor and major overhauls, and the duration of overhauls).

Routine block-level inspections, filter service, firmware management, thermal-management service, calibration, battery balancing, and corrective maintenance will be performed without a full-facility outage whenever practical. The modular design allows individual battery or inverter blocks to be isolated while remaining blocks operate at a reduced rating. Including planned and unplanned outages, the Project is expected to

[REDACTED]

[REDACTED]

[REDACTED]

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).

The principal operating constraints are a maximum net charge of 210 MW, maximum net discharge of 210 MW, 840 MWh of usable energy, [REDACTED], up to 365 equivalent full cycles per contract year, up to two cycles per day. Actual capability may be temporarily reduced by ambient temperature, cell imbalance, auxiliary load, inverter or battery-block outages, transformer/reactive limits, and ISO-NE or Transmission Owner instructions.

No minimum stable output, minimum run time, minimum down time, or fuel-start restrictions apply. The facility's plant controller will enforce active-power, reactive-power, voltage, ramp-rate, frequency-response, harmonic, and protection settings approved through the SIS and commissioning processes.

Please see responses in Sections 3.1 and 3.2 for detailed operating plan descriptions.

3.11 Degradation mitigation plan – If applicable to the proposal's technology type, specify the anticipated degradation rate (absent any mitigation) and plan for mitigation of output degradation (e.g., augmentation schedules or over build plans).

The initial design will include sufficient DC energy and performance margin to deliver 210 MW for four hours at the point of interconnection after auxiliary loads and conversion losses.

[REDACTED]

[REDACTED]

SECTION A-4: ENVIRONMENTAL ATTRIBUTE AND/OR ENERGY SERVICES DELIVERY PLAN

4.1 For each Transmission Project and Distribution Project being bid, please provide documentation and information demonstrating that the project will deliver into the Distribution Companies' NEPOOL GIS accounts, GIS Certificates representing CPECs and any other Environmental Attributes, as applicable associated with the energy storage project. Please describe whether transfer of all GIS Certificates is authorized under the current ISO-NE GIS rules and protocols, or if a rule or protocol change is required. To the extent such change is required, please provide details regarding the proposal and the process for implementing the change.

If a bidder is bidding in a non-CPS eligible project, please state.

The Project will apply for a DOER Clean Peak Statement of Qualification, register the resource in the Massachusetts Production Tracking System, obtain a NEPOOL GIS Clean Peak identification number, and complete MassCEC meter and API testing before CPEC deliveries begin. The Project will use revenue-quality metering capable of reporting the 15-minute interval charging and discharging data required by 225 CMR 21.00 and the applicable MassCEC reporting protocol. MassCEC, as Program Administrator, will verify eligible performance and communicate the resulting CPEC quantity to NEPOOL GIS for issuance.

The Project's GIS account will be configured so that all CPECs included in the Long-Term Contracts are transferred to the Distribution Companies' designated NEPOOL GIS accounts for each applicable trading period.

If a future GIS, DOER, or MassCEC change affects issuance or delivery mechanics, the parties will use the successor registry functionality or a mutually-documented administrative procedure that preserves the contracted environmental-attribute transfer without double counting.

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.

5.1 Please submit information and documentation that demonstrates that long-term contracts resulting from this RFP Process would either permit the bidder to finance, or refinance, its proposal that would otherwise not be financeable or assist the bidder in obtaining financing of its proposal. The Evaluation Team will take into account whether a bid is associated with an existing energy storage system when evaluating that bid's performance under the Threshold Requirements.

[REDACTED]

[REDACTED]

[REDACTED]

5.2 Please provide a description of the business entity structure of the bidder's organization from a financial and legal perspective, including all general and limited partners, officers, directors, managers, members and shareholders, involvement of any subsidiaries supporting the project, and the providers of equity and debt during project development. Provide an organization chart showing the relationship between the equity and debt participants and an explanation of the relationships. For jointly owned facilities, identify all owners and their respective interests, and document the Bidder's right to submit a binding proposal.

[REDACTED]

[REDACTED]

5.15 Bidders must disclose any litigation or disputes in the last three-year period related to projects developed, owned or managed by bidder or any of its affiliates in the United States, or related to any energy product sale agreement.

[REDACTED]

5.16 What is the expected operating life of the proposed project? What is the depreciation period for all substantial physical aspects of the bid, including generation facilities, delivery facilities to move power to the grid, and mandatory and voluntary transmission or distribution system upgrades?

The Project is designed for a minimum 20-year operating life, with replaceable battery modules and planned augmentation maintaining the contracted 210 MW / 840 MWh capability throughout the term of the LTC. Major balance-of-plant assets—including the generator step-up transformer, medium- and high-voltage switchgear, cabling, buildings, foundations, and portions of the control and communications infrastructure—are expected to have useful lives of 30 years or longer with appropriate maintenance. Inverters, HVAC equipment, controls, and auxiliary systems may require midlife overhaul or replacement.

For tax modeling, the Project will apply the depreciation classifications and recovery periods established by tax counsel for battery equipment, power-conversion equipment, interconnection property, site improvements, buildings, and other substantial components.

5.17 Has the bidder already obtained financing, or a commitment of financing, for the project? If financing has not been obtained, explain how obtaining a long-term agreement as proposed will help you in obtaining financing for the proposed project, in obtaining more favorable terms for the financing of the proposed project, or in supporting the future capital investment.

[REDACTED]

[REDACTED]

5.18 State whether the bidder or its affiliates have executed agreements with respect to energy, CPECs and/or capacity for the proposed project (including any agreements that have been terminated) and provide information regarding the associated term and quantities, and whether bidder has been alleged to have defaulted under or breached any such agreement. State whether the bidder or its affiliates have submitted proposals to other buyers, the status of consideration of such proposals, and the impact of such proposal(s), if they result in an executed contract or contracts, on the proposal(s) submitted in response to this RFP.

There are no previous executed agreements for the sale of energy, CPECs, capacity, or other project attributes. No other proposal has been submitted to other potential buyers.

5.19 List all of the Bidder's affiliated entities and joint ventures transacting business in the energy sector.

[REDACTED]

5.20 Has Bidder, or any affiliate of Bidder, in the last five years, (a) consented to the appointment of, or been taken in possession by, a receiver, trustee, custodian or liquidator of a substantial part of its assets, (b) filed a bankruptcy petition in any bankruptcy court proceeding, (c) answered, consented or sought relief under any bankruptcy or similar law or failed to obtain a dismissal of an involuntary petition, (d) admitted in writing of its inability to pay its debts when due, (e) made a general assignment for the benefit of creditors, (f) been the subject of an involuntary proceeding seeking to adjudicate that Party bankrupt or insolvent, (g) sought reorganization, arrangement, adjustment, or composition of it or its debt under any law relating to bankruptcy, insolvency or reorganization or relief of debtors?

No

5.21 Briefly describe any known conflicts of interest between bidder or an affiliate of bidder and any Distribution Company, or any affiliates of the foregoing.

No conflict of interest with a Distribution Company or its Affiliates is presently known to the proposal team.

5.22 Describe any litigation, disputes, claims, complaints or notices of violation or potential violation involving the project or other energy storage projects involving the bidder or an affiliate of the bidder.

[REDACTED]

5.23 Describe any failures by the bidder and/or its affiliates to achieve commercial operation dates under other long-term contracts. Bidders should also provide a credible description of how the current proposed project will avoid similar project delays or development issues.

No such failure has occurred.

5.24 Describe any litigation, disputes, claims or complaints involving the bidder or an affiliate of bidder, against any Distribution Company or any affiliate of any Distribution Company.

None

5.25 Describe any litigation, disputes, claims or complaints, or events of default or other failure to satisfy contract obligations, or failure to deliver products, involving bidder or an affiliate of bidder, and relating to the purchase or sale of energy, capacity or environmental attributes or products.

None

5.26 Confirm that neither bidder nor any directors, employees or agents of bidder, nor any affiliate of bidder are currently under investigation by any governmental agency, and that none of the above have in the last four years been convicted or found liable for any act prohibited by State or Federal law in any jurisdiction involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or have been the subject of any debarment action (detail any exceptions).

Confirmed

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

Please see Table 7-2 for a summary of required reviews and approvals. Additionally, any binding agreement will be subject to Bidder's customary internal approvals.

5.28 Describe how the project will conform to FERC's applicable regulatory requirements, including, but not limited to, FERC requirements relating to allocation of transmission capacity and open access, the justness and reasonableness of rates, the potential for undue preference or discrimination, and affiliate dealings, if any. Describe how your proposed approach is consistent with FERC precedent and ratemaking principles.

[REDACTED]




5.29 Describe and document any and all direct and indirect affiliations and affiliate relationships, contractual, financial or otherwise in the past three years between the bidder and one or more of the Distribution Companies and their affiliates, including all relationships in which one of the Distribution Companies or their affiliates has a financial or voting interest (direct or indirect) in the bidder or the bidder's proposed project. These relationships include:

- i. Corporate or other joint arrangements, joint ventures, joint operations whether control exists or not;
- ii. Minority ownership (50% or less investee);
- iii. Joint development agreements;
- iv. Project agreements;
- v. Operating segments that are consolidated as part of the financial reporting process;
- vi. Related parties with common ownership;
- vii. Credit, debenture, and financing arrangements, whether a convertible equity feature is present or not;
- viii. Wholly owned subsidiaries; and
- ix. Commercial (including real property) relationships with any Distribution Company

Bidder is not an affiliate of the Distribution Companies.

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.

The Project is being developed as a SIS resource using the existing interconnection facilities and Network Resource Interconnection Service (NRIS) rights of the Original Interconnection Customer for Canal Unit 2. The BESS is not requesting incremental CNRIS in this SIS configuration; however, it will utilize 210 MW of the unused NRIS capability of Canal Unit 2 as permissible under the SIS. Its injection and withdrawal capability will be evaluated under the current ISO-NE Tariff Schedule 22 and Transmission Owner study process, including simultaneous-operation limits necessary to keep total use within the existing interconnection capability.

[REDACTED]

[REDACTED]

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.

The Project is a standalone BESS proposed under a SIS configuration that uses existing interconnection rights and transmission facilities associated with Canal Unit 2. The Original Interconnection Customer is Canal Generating LLC, which possesses existing Capacity Network Resource Capability. The BESS is being evaluated as a surplus resource and is not seeking incremental capacity interconnection rights.

The Sponsor has engaged [REDACTED] as the independent transmission consultant to perform studies intended to mimic ISO-NE Schedule 22 and CCIS-related analyses. The study scope included steady-state power flow for charging and discharging, thermal and voltage performance under applicable contingencies, transient stability, and short-circuit duty.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

Completed 1.3.9 is expected after the ISO-NE SIS review. The [REDACTED]
[REDACTED] represent I.3.9 equivalent

studies including steady state, short circuit, and stability analyses. [REDACTED]

- ii. Copy of completed CCIS-equivalent study attached: ☒ Yes. If none, please explain:

[REDACTED]

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

[REDACTED]

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

[REDACTED]

6.3 If multiple Transmission Project interconnection requests or Distribution Project interconnection applications have been made, please specify all such active requests which have not been superseded by subsequent requests and information regarding the status of each. Provide copies of any requests made and studies completed.

The Project has not made multiple interconnection requests; thus, this is not applicable. The Project is pursuing a single SIS configuration associated with Canal Unit 2.

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.

[REDACTED]

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: ☒ Yes. If none, please explain:

[REDACTED]

Please see [REDACTED]

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: ☒ Yes. If none, please explain:

Please see [REDACTED]

6.7 Specify and describe the current or new interconnection facilities (lines, transformers, switching equipment, system protection and controls, etc.) that bidder owns or is intending to construct or have constructed in order to deliver the proposed energy, to the extent presently known.

The Project will tie into the high-voltage side of Canal Unit 2's main power transformer and use the existing generator lead, Eversource switchyard position, and associated transmission breakers to the extent approved through SIS.

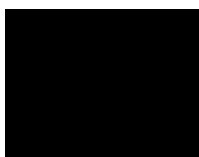
[REDACTED]

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 curtailments.

[REDACTED]

SECTION A-7: SITING, PERMITTING AND COMMUNITY SUPPORT

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:

The proposed Project will be located on an approximately 5.5-acre portion of the larger (approximately ~29-acre) Canal Generating Station site located at 9 Freezer Road in Sandwich, Massachusetts. The Project will occupy the northeastern corner of the Canal Generating Station site ([REDACTED]) which is owned by the Sponsor. The Project will use SIS associated with POI of Canal Unit 2 and will interconnect on the high-voltage side of the existing unit main power transformer through a new 34.5 kV collector system and 34.5/345 kV GSU. The Project will then connect to the grid using an existing generator tie line from Canal Unit 2 to the existing Eversource 345 kV switchyard located immediately south of the Canal Generating Station.

[REDACTED]

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.

- i. Does the project have a right to use the eligible facility site for the entire proposed term of the LTC (e.g., by virtue of ownership or land development rights obtained from the owner)? Yes ☒ No ☐ If not, please explain.
- ii. If so, please detail the bidder's rights to control the Energy Storage System site and interconnection locations.

[REDACTED]

- iii. Describe the status of acquisition of real property rights, any options in place for the exercise of these rights and describe the plan for securing the necessary real property rights, including the proposed timeline. Include these plans and the timeline in the overall project timeline.

[REDACTED]

- iv. Identify any joint use of existing or proposed real property rights

[REDACTED]

- 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)

[REDACTED]

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.

Permitting

The Sponsor is preparing the Project's permit application under the Energy Facilities Siting Board's (EFSB's) new siting and permitting process established in accordance with *An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers* (the "2024 Climate Act"). The 2024 Climate Act provides the EFSB with the authority to issue all individual state, regional, and/or local permits that would otherwise be necessary for a Clean Energy Infrastructure Facility (CEIF) under its jurisdiction, including Large Clean Energy Storage Facilities (LCESFs) such as the Project. Accordingly, the Project will require a Consolidated Permit⁷ from the EFSB pursuant to M.G.L. c. 164, § 69T. The Project's

⁷ As defined at 980 CMR 1.01, Consolidated Permit means a permit issued by EFSB for a Large Clean Energy Infrastructure Facility (LCEIF) or a Small Clean Energy Infrastructure Facility (SCEIF) that includes all municipal, regional, and state permits that the LCEIF or SCEIF would otherwise need to obtain individually, with the exception of certain federal permits that are delegated to specific state agencies as determined by EFSB.

Consolidated Permit will incorporate all state, regional, and local permits required for the Project.⁸

Zoning

The 2024 Climate Act provided the EFSB with the authority to issue exemptions from local zoning bylaws for CEIF. As such, the Project is able to seek zoning exemptions from the EFSB (if needed) as part of its Consolidated Permit Application in a single, streamlined process.

The Project is located within the existing Canal Generating Station industrial power-generation site (REDACTED). Based on the Town of Sandwich's Zoning Map, the existing facility is in the Industrial (IND) Zoning District. Additionally, much of the Project site is located in the 100-year floodplain mapped by the Federal Emergency Management Agency (FEMA) and is therefore also in the Town's Flood Plain Overlay District. Further, the Town's Protective Zoning Bylaw (dated November 2025) requires Special Permits for certain projects based on the site's zoning district and planned activities.

7.4 Permitting plan and timeline — Enter appropriate explanation in this space or reference applicable attachment(s); start date: 2026; end date: 2028

The Sponsor has developed a practical permitting schedule to ensure on-time delivery of the Project. The permitting activities are supported by environmental consultants with the experience and expertise required to successfully permit BESS projects before the EFSB (see Section 13).

⁸ An applicant can choose whether to request Ministerial Permits (e.g., building permits) in the Consolidated Permit Application or to obtain such permits from relevant local departments following their standard procedures. As described in Section 7.8, the Sponsor will confirm which Ministerial Permits apply to the Project and determine whether to seek Ministerial Permits as part of the Consolidated Permit Application based on consultations with the Town of Sandwich.

[illegible]

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 Project site is an existing coastal industrial power-generation property (the Canal Generating Station) at 9 Freezer Road near the eastern end of the Cape Cod Canal. Land uses surrounding the Project site include Cape Cod Canal and adjacent United States Army Corps of Engineers (Corps)-maintained recreational areas (including the Cape Cod Canal Bikeway and Sandwich Recreational Area) to the north; industrial facilities associated with the Canal Generating Station to the west; Eversource's 345 kV switchyard, existing electric transmission line corridors, and forested and wetland areas to the south; and Sandwich Marina, charter fishing businesses, and restaurants to the east. The Project will be placed within the developed Canal Generating Station property to maximize separation from public receptors and use existing access and utilities.

As with all of Cape Cod, the Project site falls within a US Environmental Protection Agency (EPA)-designated Sole Source Aquifer. Based on Massachusetts Geographic Information System (MassGIS) data layers, the Project site does not contain any Natural Heritage and Endangered Species Program (NHESP) certified vernal pools, potential vernal pools, Public Water Supplies, Zone I or Zone II Wellhead Protection Areas, Interim Wellhead Protection Areas (IWPAs), Surface Water Supply Protection Areas (Zones A, B, or C), or Outstanding

Resource Waters. According to the Cape Cod Commission's (CCC's) 2025 Regional Policy Plan (RPP) Data Viewer, the Project site also does not contain any Potential Public Water Supply Areas (PPSWAs), Impaired Areas, Contributing Area to Ponds, or Marine Water Recharge Areas, as defined in the Cape Cod RPP. Additionally, the Project site does not contain NHESP Priority Habitat of Rare Species, NHESP Estimated Habitat of Rare Wildlife, Areas of Critical Environmental Concern (ACECs), BioMap Core Habitat, or BioMap Critical Natural Landscape. Given its proximity to the Cape Cod Canal, nearly the entire Project site is in the 100-year floodplain (FEMA National Flood Hazard Layer Zone AE). The Project will be designed to safely withstand current and future flooding conditions in accordance with all applicable floodplain requirements.

Overall, the Project is compatible with the previously developed, industrial character of the surrounding area and is not anticipated to impact surrounding land uses.

A description of the local zoning is provided in Section 7.3.

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

[REDACTED]

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.

As discussed further in Section 7.8, the Project is seeking a Consolidated Permit from the EFSB, which will include all state, regional, and local permits in a single streamlined process. Development of the Project's Consolidated Permit Application is beginning. Although the EFSB will issue all state, regional, and local permits for the Project, the agencies who would have otherwise issued the permits (referred to as Permit Enforcement Agencies [PEAs]) are responsible for enforcing the Consolidated Permit conditions relevant to their jurisdiction.

Table 7-2 below summarizes the state, regional, and local permits/approvals included in the Consolidated Permit as well as the federal permits required for the Project. Required agency reviews are also listed in Table 7-2. Each permit, approval, and agency review is described further in Section 7.8.

[REDACTED]

4. Based on MassGIS data layers, the Project is not within mapped Priority or Estimated Habitat. The Project will file a Request for State-listed Species Form to confirm with NHESP that there are no Priority or Estimated Habitats on the Project site.
5. The only federal permits potentially required for the Project are NPDES and/or USACE general permits. As these general permits have already been reviewed by the Massachusetts Office of Coastal Zone Management, the Project is not expected to require additional federal consistency review.

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.

An overview of the Project's permitting timeline is provided in Table 7-1, and major permitting milestones are included in the Project's critical path schedule detailed in Section 10. The current status and anticipated timeline for seeking each required permit/approval is provided in Table 7-2. A project approval assessment that describes, in narrative form, each segment of the permitting process is provided below.

7.8.1 State, Regional, and Local Permitting

EFSB Consolidated Permit

As the Project's rated capacity will exceed 100 MWh, the Project meets the definition of LCESF and requires a Consolidated Permit from the EFSB pursuant to M.G.L. c. 164, § 69T.

The Sponsor is beginning to prepare the Project's Consolidated Permit Application. The Application will describe the Project and its site; demonstrate the site's suitability for clean energy development; address avoidance, minimization, and mitigation of Project impacts; describe Project benefits; and incorporate all required state, regional, and local permit applications and proposed permits, along with any requested zoning exemptions, into a single submission that complies with 980 CMR 13.00 and the accompanying *980 CMR 13.00: EFSB Consolidated Permit Application Guidance*.

The Consolidated Permit Application will also include a comprehensive environmental assessment, which will address topics such as land use, wildlife and habitat, water resources, historical and archaeological resources, transportation, air quality, climate, noise, visual impacts, electromagnetic fields (EMF), Environmental Justice (EJ) communities and Burdened Areas, and public health and safety. While EFSB-covered actions under M.G.L. c. 164, § 69T are exempt from Massachusetts Environmental Policy Act (MEPA) review (see 980 CMR 2.02(6)), the Application will contain similar material to past MEPA filings for energy facilities. To support the Application's development, the Sponsor has already performed desktop environmental studies and onsite investigations.

During the development of the Consolidated Permit Application, the Sponsor is meeting with agencies, key stakeholders, and the local community to discuss and solicit feedback

on the Project's design, potential impacts, benefits, and avoidance, minimization, and mitigation measures. This outreach process is further discussed in Section 7.10.2.

The Project's anticipated timeline for submitting the Consolidated Permit Application is provided in Table 7-2. Once the Project's Consolidated Permit Application is filed with the EFSB, the EFSB will make a Completeness Determination within 30 days. Once EFSB issues a Notice of Completeness for the Project's Consolidated Permit Application, EFSB must issue a Final Decision within 15 months. If EFSB fails to meet this statutory deadline, the Project will receive a Constructive Approval (an automatic approval) per 980 CMR 17.00. This 15-month statutory review timeline provides considerable certainty regarding the Project's permitting timeline.

Massachusetts Historical Commission Review

MHC reviews any new construction, renovation, or demolition project that requires funding, licenses, permits, or approvals from any state or federal governmental agency. MHC's review process aims to reach agreement to avoid, minimize, or mitigate adverse effects on historic and archaeological properties. The Project requires MHC review pursuant to M.G.L. c. 9 §§ 26-27C because the Project requires state permits.

MHC's review of the Project will be initiated with the submission of a Project Notification Form (PNF). The Project's anticipated timeline for submitting the PNF is provided in Table 7-2. Once MHC receives the PNF, MHC's staff will respond (in writing) within 30 days, indicating whether the Project is likely to affect historic or archaeological resources, whether further MHC review is required, whether additional information or surveys are needed, and/or what avoidance, minimization, or mitigation measures are appropriate. If MHC does not respond to the PNF within 30 days, no further MHC review is needed.



MassDEP Section 401 Water Quality Certification (WQC)

Under Section 401 of the federal Clean Water Act (CWA), a 401 Water Quality Certification (WQC) is required for certain activities in wetlands and waters. This law gives states the authority to review projects that must obtain federal licenses or permits and that result in a discharge to state waters, including excavating and fill in waters of the US within the Commonwealth. In Massachusetts, the 401 WQC program is administered through state regulations (314 CMR 9.00) by MassDEP. 314 CMR 9.00 applies to the discharge of dredged or fill material, dredging, and dredged material disposal activities in waters of the US within the Commonwealth that require federal licenses or permits.

The Project is currently assessing whether work will occur in wetlands or other waters of the US within the Commonwealth. If applicable, a Section 401 Water Quality Certification application will be incorporated into the EFSB Consolidated Permit Application and the

Project will be subject to similar principles as those under the WPA and local Wetlands Bylaws, including the avoidance, minimization, and mitigation of impacts to regulated resources.

Massachusetts Endangered Species Act Review

The Massachusetts Endangered Species Act (MESA) protects rare species and their habitats by prohibiting the "Take" of any plant or animal species listed as Endangered, Threatened, or of Special Concern by MassWildlife.⁹ As part of the implementation of MESA, NHESP is responsible for reviewing projects and maintaining maps that identify protected species habitat. NHESP maintains maps of two types of protected species habitat: Priority Habitat and Estimated Habitat. Priority Habitat includes habitats for wetland and non-wetland wildlife and plant species. Estimated Habitat includes habitat for wetland-dependent wildlife (animal) species only and is intended for use by both NHESP and local Conservation Commissions during the review of projects subject to the Massachusetts Wetlands Protection Act (WPA).

The Project is not within mapped Priority or Estimated Habitat. The Project will file a Request for State-listed Species Form to confirm with NHESP that there are no Priority or Estimated Habitats on the Project site.

Cape Cod Commission Development of Regional Impact Review

CCC is a regional land use planning, economic development, and regulatory agency with jurisdiction over all of Barnstable County, including the Town of Sandwich. Under the Cape Cod Commission Act, CCC has the authority to review and regulate Developments of Regional Impact (DRIs), which are projects that are "likely to present development issues significant to or affecting more than one municipality" due to their size or the nature of their impacts on the environment. The purpose of a DRI review is to ensure that a proposed project is consistent with the Cape Cod Commission Act, the Cape Cod RPP, municipal development bylaws, and Local Comprehensive Plans and that the probable benefit from the proposed project is greater than the probable detriment.

The Project is expected to meet the mandatory DRI review thresholds in Section 3 of *Chapter A: Enabling Regulations Governing Review of Developments of Regional Impact, Barnstable County Ordinance 90-12*, including a Total Project Area for Outdoor Uses exceeding 40,000 ft².¹⁰ Therefore, the Project will likely need to prepare a DRI Application,

⁹ In reference to animals, "Take" means "to harass, harm, pursue, hunt, shoot, hound, kill, trap, capture, collect, process, disrupt the nesting, breeding, feeding or migratory activity or attempt to engage in any such conduct, or to assist such conduct." In reference to plants, "Take" means "to collect, pick, kill, transplant, cut or process or attempt to engage or to assist in any such conduct. Disruption of nesting, breeding, feeding or migratory activity may result from, but is not limited to, the modification, degradation or destruction of Habitat."

¹⁰ *Outdoor Use* means "A use with facilities or activities that are predominantly accommodated outside, rather than within a structure. For instance, gravel mining, commercial parking lots, golf courses,

which will be included in the Project's Consolidated Permit Application. The EFSB will issue the DRI Decision as part of the Consolidated Permit.

Sandwich Conservation Commission Order of Conditions

The Massachusetts WPA (MGL c.131 § 40) and implementing regulations (310 CMR 10.00) govern activities in and near wetland resource areas. This state statute is administered locally by Conservation Commissions and MassDEP upon appeal. In addition to administering the WPA, the Town of Sandwich enforces additional, more stringent Wetlands Bylaws and Regulations, which expand protections beyond state requirements.

Projects affecting wetlands or areas within 100 ft of regulated resources (Buffer Zones) must file a Notice of Intent (NOI). The Project is seeking to avoid or minimize wetland impacts but much of the Project site is located within Land Subject to Coastal Storm Flowage or Buffer Zones. As a result, the Project must prepare an NOI, which will be included in the Consolidated Permit Application. The resulting Order of Conditions will be issued by the EFSB as part of the Consolidated Permit.

Sandwich Historic District Committee Certificate of Appropriateness

The Sandwich Old King's Highway Historic District Committee administers the Old King's Highway Regional Historic District Act (Chapter 470 of the Acts of 1973), which provides protection for visual character and setting by requiring that all exterior changes to buildings, signs, and other construction in the district are reviewed for congruity, compatibility, and appropriateness with the historic character of Sandwich. The Project site is within the Old King's Highway Historic District. Therefore, the Project must file an Application for Certificate of Appropriateness, which would be included in the Project's Consolidated Permit Application submitted to EFSB.

Local Ministerial Permits

The Project is expected to require Ministerial Permits (i.e., non-discretionary "by right" permits) from the Town.¹¹ Ministerial Permits required for the Project are expected to include a Building Permit and an Electrical Permit. The Project may also require a permit from the Sandwich Fire Department, a Public Property and/or Private Property Road

marinas, and outdoor active recreation uses would generally be classified as Outdoor Uses. For all Outdoor Uses, the size of the facility shall be based on the Total Project Area." "The calculation of Total Project Area shall include but not be limited to outdoor storage/sales/service/display, parking areas, landscaped areas and/or any site alteration or site disturbance associated with the proposed development including the footprint of all buildings and structures."

¹¹ A Ministerial Permit is defined at 980 CMR 13.01 as "a non-discretionary Permit or approval for a CEIF Project that meets objective, pre-defined codes and standards, and is typically approved in a streamlined, time-bound, administrative process that does not involve adjudication. A Ministerial Permit is usually issued after other adjudicatory or discretionary Permits are issued, and the project is at a more advanced state of design completion, prior to the intended start of construction or operation of a CEIF Project."

Work/Trench Permit from the Department of Public Works Highway Department,¹² a Driveway Permit from the Department of Public Works Engineering Department, and a Tree Work Permit from the Department of Public Works Tree Warden.

An applicant can choose whether to request Ministerial Permits in the EFSB Consolidated Permit Application or to obtain such permits from relevant local departments prior to construction following their standard procedures. Ministerial Permits requested in the Consolidated Permit Application would be issued by the EFSB in response to the Project's compliance filing following EFSB's Final Decision (or following the Project's Constructive Approval, if a Constructive Approval is issued). The Sponsor will confirm which Ministerial Permits apply to the Project and determine whether to seek Ministerial Permits as part of the Consolidated Permit Application based on consultations with the Town of Sandwich.

7.8.2 Federal Permitting

EPA NPDES Stormwater Construction General Permit

Projects in Massachusetts that result in the disturbance of one or more acres of land and have the potential to discharge stormwater to wetlands or other waters of the US require permit coverage for stormwater discharges under the EPA's National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) for Stormwater Discharges from Construction Activities. As the Project is expected to disturb more than one acre of land, a NPDES CGP will be required.

Coverage under the CGP requires the preparation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP), which provides a description of the proposed project and identifies the best management procedures and procedures that will be implemented during construction to prevent stormwater contamination, control erosion and sedimentation, and comply with the requirements of the CWA. To obtain coverage under the CGP, the Project must file an electronic NOI with EPA. Coverage begins 14 days after filing a complete NOI.

USACE Section 404 Permit

Section 404 of the federal CWA authorizes the USACE to issue permits, after notice and opportunity for public hearing, for the discharge of dredged or fill material into "waters of the United States." Waters of the US is broadly defined in the federal regulations that implement the CWA, and it includes tidal waters, rivers, streams, lakes, ponds, and adjacent wetlands. Nationwide Permits (NWP) are federal permits issued by the USACE every five years to streamline approval of activities with minimal impacts on aquatic resources. They cover a wide range of project types and may include regional conditions to address local environmental concerns.

¹² See: <https://www.sandwichmass.org/208/Highway>

The Project is currently assessing whether work will occur in wetlands or other waters of the US that would require a Section 404 NWP. If applicable, a Section 404 permit application will be filed and the Project will be subject to similar principles as those under Section 401, the WPA, and local Wetlands Bylaws, including the avoidance, minimization, and mitigation of impacts to regulated resources.

Section 106 Consultation

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects of federal “undertakings” (i.e., projects that are carried out, assisted, funded, permitted, licensed, or approved by a federal agency) on historic properties. If a federal or federally assisted project has the potential to affect historic properties that are listed, or are eligible for listing, in the National Register of Historic Places, a Section 106 review will take place.

As described above, the only federal permits potentially required for the Project are the EPA NPDES CGP and Corps 404 NWP. Coverages of individual construction sites under the CGP do not constitute separate federal undertakings. However, Appendix E (Historic Property Screening Process) of the CGP will require a consideration of cultural resources and potential consultation with MHC and Native American tribes. Similarly, for activities authorized under a Corps NWP, the Corps evaluates whether the proposed activity may affect historic properties and, where necessary, consults with MHC, Native American tribes, and other consulting parties before confirming NWP authorization.

Section 7 ESA Consultation

Under Section 7 of the federal Endangered Species Act (ESA), federal agencies must consult with the National Marine Fisheries Service (NMFS) and/or the US Fish and Wildlife Service (USFWS) when an action the agency carries out, funds, or authorizes (such as through a permit) may affect a federally listed endangered or threatened species and/or designated critical habitat. The purpose of the consultation is to assist the federal agency in meeting its duty to ensure that its action is not likely to jeopardize the continued existence of any federally listed species or destroy or adversely modify designated critical habitat.

As described above, the only federal permits potentially required for the Project are the EPA NPDES CGP and Corps 404 NWP. Appendix D (Eligibility Worksheet Relating to Threatened and Endangered Species Protection) of the CGP outlines the process for documenting an applicant’s eligibility criteria with respect to the protection of federally listed species and designated critical habitat under the ESA. While coordination with USFWS and/or NMFS may not be required, EPA encourages applicants to coordinate with these agencies, to document that coordination, and to do so early in the planning process prior to submitting the NOI. Similarly, compliance with General Condition 18 (Endangered Species) of the Corps 404 NWP program requires applicants to evaluate potential impacts and submit a pre-construction notification if any listed species or designated critical habitats are in the vicinity of the activity.

FAA Notice of Construction or Alteration

If the Project (including any cranes, lighting masts, etc.) exceeds 200 ft above ground level (AGL), is near an airport, or penetrates specific imaginary surfaces (as specified further at 14 CFR § 77.9), the Project must submit a Notice of Construction or Alteration (Form FAA 7460-1) to the Federal Aviation Administration (FAA) to notify them of any proposed construction or structural alterations that could impact navigable airspace. Form FAA 7460-1 would be filed with the FAA 45-90 days prior to the start of construction.

7.9 Provide information (a) demonstrating past and current productive relationships with host communities, federally recognized and state acknowledged tribes, Environmental Justice communities and other stakeholders; and (b) demonstrating your track record of avoiding, minimizing, and mitigating environmental, tribal, and environmental justice impacts from energy storage projects similar to the proposed project.

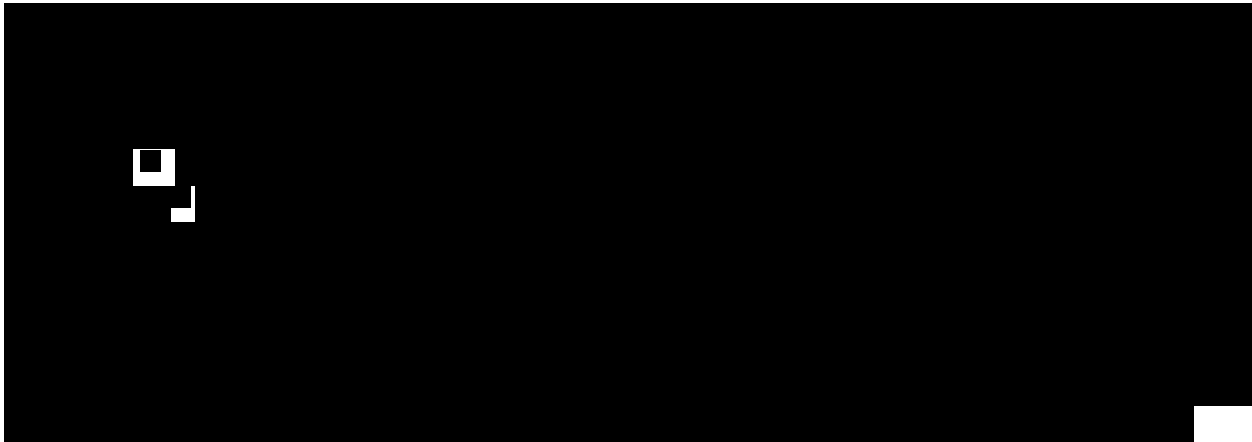
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¹³ JERA Canal Energy Storage Project Public Meeting, September 3, 2026

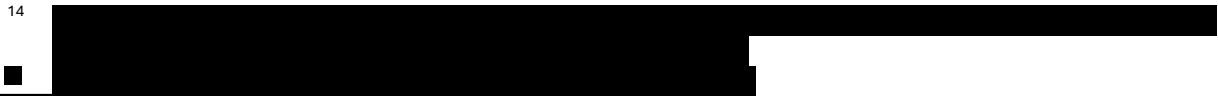


7.10 Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. Include information on specific host community and localized support and/or opposition to the project of which the bidder is aware. Provide copies of any 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.

The Sponsor sees community engagement as central to developing the Project responsibly and has a robust outreach program to share updates with the community and stakeholders and obtain feedback about the Project.

The Sponsor’s stakeholder engagement plan is designed to meet the requirements of the “Pre-filing Outreach Period” for EFSB Consolidated Permit Applicants as outlined under 980 CMR 16.00, an outcome of the EFSB siting and permitting reforms under the 2024 Climate Act. The plan is also designed to go beyond EFSB regulations to meet the specific requirements of local stakeholders, whose input has shaped the Project since it was first envisioned.

As the owner and operator of Canal Generating Station, the Sponsor already has working relationships with the Town of Sandwich, local first responders and neighboring residents and businesses, and it has built on them from the start of development. Sponsor's approach is centered on early engagement and responsiveness, transparent communications and technology education.



matters most to the community: public safety, environmental protection, well-coordinated construction, and local job opportunities. A full stakeholder map and community engagement plan is provided in Attachment A-7-6.

[REDACTED]

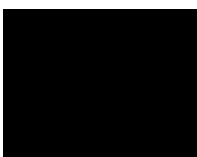
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SECTION A-8: SAFETY PLAN

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.

Preliminary project drawings are included in Attachments A-6-4, A-7-1, and A-7-2 and will be advanced through 30%, 60%, 90%, and issued-for-construction stages.

- ii. Fire protection datasheets: Provide final, draft, or proposed technology fire protection system datasheets for the project.

██████████ fire-protection and safety documentation is included in Attachments A-8-7 and A-9-1 through A-9-6. The supplied materials address integrated detection, thermal management, monitoring, isolation, emergency shutdown, overpressure management, and the relationship between UL 9540A test results and installation design. Final system-specific submittals will be incorporated into the Hazard Mitigation Analysis (HMA) and approved by the AHJ.

- iii. UL equipment listings and certifications: List plans to comply with the applicable UL equipment listings and certifications. Optionally, bidders may provide supplemental commentary related to UL equipment listings and certifications that they believe may be relevant or useful to the Evaluation Team for the purpose of evaluating the bid.

The final integrated BESS will be listed to UL 9540, use stationary batteries certified to UL 1973 as applicable, and use power-conversion equipment certified to UL 1741 or the applicable successor/product standard. The selected configuration will have UL 9540A test data at the cell, module, unit, and installation level as required by the adopted code and AHJ. Electrical equipment will comply with the Massachusetts Electrical Code, NFPA 70, and applicable IEEE/ANSI standards.

- 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.

A preliminary site-specific HMA is included as Attachment A-8-3. It evaluates thermal runaway, propagation, flammable or toxic gas release, deflagration, external fire exposure,

electrical faults, arc flash, coolant release, flooding, severe weather, seismic event, mechanical impact, cyber or control failure, and emergency shutdown. The HMA will be updated for the exact [REDACTED], final layout, UL 9540A evidence, manufacturer instructions, adopted code, and AHJ requirements.

The HMA will remain a controlled design document through permitting, detailed engineering, commissioning, and material equipment or software changes.

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

A preliminary site-specific Emergency Response Plan is included as Attachment A-8-4 and will be finalized with the Sandwich Fire Department, police, emergency management, Eversource, ISO-NE, Canal Generating Station's operations team, [REDACTED] and the Project's safety consultant, [REDACTED]. It defines command and notification, site access, isolation and emergency shutdown, evacuation or shelter zones, re-entry, fire-service tactics, air monitoring, water supply and runoff containment, medical response, severe-weather procedures, public information, evidence preservation, recovery, and post-incident review.

The final ERP will include 24-hour contacts, site maps, safety data, equipment hazards, shutdown instructions, responder pre-plans, and annual drill and refresher-training requirements.

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

A draft high-level training plan for Canal Generating Station employees (as described in Section 14.1, this group includes future Project employees) is attached (Attachment A-8-8). A more detailed, Project-specific training plan is under development. The Bidder has engaged [REDACTED] to develop Project-specific training materials from [REDACTED], an emergency operations plan, the HMA, the Sponsor's safety management plan (See Attachment A-8-1), and the final ERP.

Training will cover lithium-ion hazards, thermal-runaway indicators, electrical and arc-flash safety, lockout/tagout, alarms, emergency shutdown, fire-water and runoff strategy, PPE, access control, incident command, reporting, and recovery. Project personnel will receive role-based initial and refresher training; contractors will complete site orientation; and local responders will receive equipment-specific classroom and field training with periodic drills.

Training completion, competency, drills, and corrective actions will be documented in the Project learning and safety systems.

[REDACTED] will also be retained to provide on-site safety training after Project's completion.

- vii. **Explosion control:** Provide final, draft, or plans to develop project-specific explosion control designs, including plans to comply with the applicable UL test results standards and plans to comply with applicable NFPA requirements.

Explosion-control design will be based on the gas composition, release rates, ignition behavior, and propagation results for the exact [REDACTED]. The HMA will determine required detection, ventilation, overpressure or deflagration protection, separation, shutdown logic, and responder exclusion distances under NFPA 855, the adopted fire code, and the applicable UL 9540A evidence. The Project will not substitute generic test results for installation-specific analysis.

The final design basis and calculations will be submitted to the AHJ as part of the permit package and controlled through management of change.

8.2 Please include a discussion on incident preparedness and address all steps the project has taken to avoid potential safety issues, mitigate safety issues when they occur, and protect property, personnel, and the surrounding community.

Incident preparedness begins with prevention-by-design: listed equipment, conservative separation and access, continuous BMS/EMS monitoring, redundant temperature and electrical protection, thermal management, fault isolation, emergency shutdown, lightning/grounding, cybersecurity, controlled work, and preventive maintenance. The Project will maintain pre-incident plans with local responders, conduct drills, stage response information at accessible locations, and preserve remote shutdown capability.

When an abnormal condition occurs, alarms will escalate to the 24-hour control function, affected blocks will be isolated, emergency services and required authorities will be notified, access controls and protective zones will be established, and air/runoff monitoring will be deployed as indicated by the ERP and Emergency Operations Plan (EOP). Recovery will require stabilization, OEM/safety-engineer assessment, evidence preservation, root-cause review, corrective action, and authorization before return to service.

The attached Incident Reporting and Investigation Procedure (Attachment A-8-6) will govern reporting and investigation together with the site-specific ERP and HMA. Please see Attachment A-8-5 for the Bidder's draft EOP.

8.3 Please describe plans and measures to operate the facility safely, including but not limited to monitoring and maintenance procedures, mitigation features and potential failure modes.

Safe operation will be controlled through the BMS, enclosure controls, PCS protection, plant controller, SCADA, and independent protection systems. Operators will monitor cell voltage and temperature, SOC/state of health, insulation, coolant/HVAC condition, smoke/gas/fire alarms, inverter/transformer condition, communications, weather, and security. Automated logic will alarm, derate, isolate, trip, and place equipment in a safe state according to validated thresholds.

Maintenance will use OEM procedures, qualified personnel, work planning, lockout/tagout, arc-flash boundaries, thermography, torque/connection inspection, sensor and protective-

device testing, fire-system inspection, housekeeping/vegetation control, firmware/change management, and documented return-to-service checks. The attached Health and Safety Management Plan (Attachment A-8-2) provides the corporate framework; the final O&M manuals will contain equipment-specific intervals.

8.4 Please describe consequences resulting from various levels of potential failures and safety events.

The Project's preliminary HMA is provided in Attachment A-8-3. The document covers all major consequences of BESS failure and their mitigative barriers. Further, the HMA includes consequences of failure and critical safety system survivability for events including thermal runaway and failure of protection systems.

8.5 Please discuss intentions to continuously improve the safety practices while operating the facility, such as plans for regular safety audits and feedback mechanisms.

The Project will operate under the Sponsor's Health and Safety Management Program (Attachment A-8-2) and site-specific procedures using a plan-do-check-act cycle. Note that this program and these procedures have already been implemented at the Canal Generating Station, where the Project will be co-located. Continuous improvement will include routine field observations, monthly leading/lagging indicators, contractor reviews, annual compliance and management-system audits, periodic independent BESS/fire-safety audits, drill evaluations, management-of-change controls, incident and near-miss investigations, corrective-action tracking, and review of OEM/industry alerts.

Workers and contractors will have stop-work authority and channels to raise concerns without retaliation. Lessons learned will be incorporated into design standards, training, spares, work procedures, and the ERP. The Sponsor's public safety program describes an integrated safety culture, a Three Lines management model, and feedback from onsite personnel to management.

8.6 Please describe reporting protocols, both internally and externally.

Internal reporting will follow the Sponsor's Incident Reporting and Investigation Procedure (Attachment A-8-6) and the site escalation matrix. Operating personnel will immediately report emergencies to the control room and site leadership; initiate required emergency notifications; preserve logs, alarms, video, and physical evidence; and enter incidents, near misses, environmental releases, and unsafe conditions into the corrective-action system. Severity classification will determine executive, legal, insurer, lender, OEM, and board reporting.

External reporting will be made to 911/local responders, ISO-NE, Eversource, EFSB/permit agencies, MassDEP, OSHA, environmental agencies, insurers, the Distribution Companies, and other authorities according to the event and applicable deadlines. Community communications will be coordinated through a designated public-information lead and will provide timely, verified information without compromising emergency operations or investigations.

8.7 Please describe bidder's experience employing safety plans for similar projects currently under construction or in operation, including bidder's approach to risk assessment, design standards, and coordination with local authorities and emergency responders. Please describe how bidder's safety protocols have evolved over time.

The Sponsor operates large, complex power facilities, including the Canal Generating Station site where the Project will be located, and applies formal safety-management, process-safety, contractor-control, risk-assessment, audit, and incident-learning systems.

For the Project, safety systems will be supplemented by BESS-specific OEM procedures, UL 9540/9540A evidence, NFPA 855 design, an independent HMA, a site-specific ERP, first-responder training, and commissioning/acceptance tests. Risk reviews will occur at design gates and before energization, with local authorities engaged early enough to influence access, water, isolation, communications, and training.

8.8 Have any of bidder's prior projects experienced fire incidents, thermal events, or related safety concerns? If so, please summarize the circumstances, response actions taken, and lessons learned for each relevant facility and location.

No projects owned or operated by the Bidder or its Affiliates have experienced fire incidents, thermal-runaway events, or related safety concerns.

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.

[REDACTED]

[REDACTED]

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:

- i. Type of energy storage technology (e.g., mechanical, chemical, thermal) and the specific details of the energy storage technology and how it works

The Project is a modular, AC-coupled lithium-ion BESS. During charging, bidirectional power-conversion equipment converts ISO-NE grid AC power to DC energy stored electrochemically in battery cells; during discharge it converts DC energy back to synchronized AC power. [REDACTED]

- ii. Major equipment to be used including the components of the energy storage technology itself and surrounding system (e.g., inverter, enclosures, HVAC, meters, electrical and communication equipment, fire suppression).

Major equipment includes the [REDACTED]

[REDACTED] includes a 34.5 kV collector system; a dedicated 34.5/345 kV GSU transformer; 345 kV breaker, disconnect, and tie-in equipment; master plant controller, EMS and SCADA; protection, communications, and cybersecurity; station service and backup power; grounding and lightning protection; and civil foundations, roads, fencing, drainage, lighting, and security.

- iii. Manufacturer of each of the equipment components listed above as well as the location of where each component will be manufactured.

[REDACTED]

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

- [REDACTED]
- 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

- [REDACTED]
- vi. Equipment vendors selected/considered

- [REDACTED]
- vii. Track record of equipment operations, including safety record

Please see Attachment A-9-6 for BESS OEMs performance record.

- viii. Include all UL certifications and other relevant industry codes and standards for key equipment including but not limited to storage modules, power conversion system, and/or integrated product certifications

Please see Attachment A-9-7 for BESS OEM's compliance with UL certifications and other codes and standards.

- ix. Description of equipment warranties and guarantees, including terms and expiration

The current procurement scope under negotiations includes the following warranties:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- x. If the equipment manufacturer has not yet been selected, identify in the equipment procurement strategy the factors under consideration for selecting the preferred equipment.

[REDACTED]

9.2 If the bidder has not yet selected the major equipment for a project, please provide a list of the key equipment suppliers under consideration.

[REDACTED]

9.3 Please identify the same or similar equipment by the same manufacturer that are presently in commercial operation including the number installed, installed capacity and estimated generation for the past three years.

[REDACTED]

9.4 For less mature technologies or equipment, provide evidence (including identifying specific applications) that the technology or equipment to be employed for energy production is ready for transfer to the design and construction phases. Also, address how the status of the technology or equipment is being considered in the financial and permitting plans for the project. Provide the status of testing/qualification for any equipment in development.

[REDACTED]

9.5 Please indicate if the bidder has a full and complete list of equipment needed for all physical aspects of the bid, including the Energy Storage System and all equipment required for the System to fulfill its operational plan, and mandatory and voluntary transmission or distribution system upgrades. Include OEM-supplied data sheets for all equipment. If bidder does not have a full and complete list of equipment, identify the areas of uncertainty

[REDACTED]

and when the full and complete list of equipment will be identified.

The Project has a complete basis-of-design equipment breakdown sufficient for bid pricing and preliminary engineering, but final makes, models, quantities, ratings, and countries of manufacture remain subject to completion of the EPC/OEM procurement and detailed design. No transmission network upgrades have been identified; all Project-owned interconnection facilities are included in the basis of design.

Please see Attachment A-7-1 for the Project layout [REDACTED]

Please see Attachments A-9-1 through A-9-4 for equipment specifications and datasheets.

9.6 Please indicate if the bidder has secured its equipment for all physical aspects of the bid, including the Energy Storage System and all equipment required for the System to fulfill its operational plan, and mandatory and voluntary transmission or distribution system upgrades. If not, identify the long-lead equipment and describe the timing for securing this equipment.

[REDACTED]

The longest-lead items are expected to include the integrated BESS/PCS supply, 34.5/345 kV GSU transformer, high-voltage breaker and disconnects, medium-voltage switchgear/transformers, protection/control panels, and specialized communications equipment.

[REDACTED]

9.7 Does bidder intend to propose any technology (1) that it, its affiliates or parent companies have used in a prior project, (2) that has been involved in a fire or thermal event anywhere in the world and (3) that necessitated a root cause analysis? If yes, please submit the root cause analysis and related documentation as part of the bid package. If no, please state that this question is not applicable.

[REDACTED]

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.

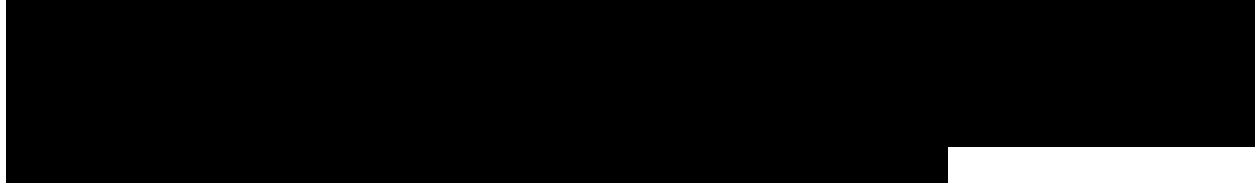
Please answer the following questions in Section A-10 for each Transmission Project and Distribution Project being bid:

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.

The complete critical-path schedule is included as Attachments A-10-1 through A-10-3.

The Sponsor has prepared an integrated schedule that includes contract negotiation and DPU approval; site-control and shared-facility agreements; EFSB pre-filing and consolidated permitting; SIS application, study, I.3.9 review, facilities design, and interconnection agreement; 30/60/90% engineering; [REDACTED] and high-voltage equipment contracting; prohibited-foreign-entity and tax-credit diligence; final investment decision; long-lead notices to proceed; site preparation; GSU, collector, and tie construction; BESS delivery and installation; protection, communications, and SCADA integration; energization; commissioning and performance testing; ISO-NE, MassCEC, and GIS registration; and commercial operation. See Attachments A-10-1 through A-10-3.

The Guaranteed COD is January 1, 2031—approximately 24 months before the RFP's December 31, 2032 commercial operation deadline. The schedule uses logically linked activities, responsible parties, contractual milestones, float, seasonal/weather constraints, outage windows, and risk allowances.

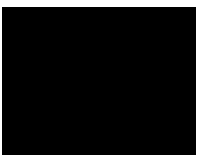


10.2 Describe and demonstrate that the project is more likely than not to come online by the commercial operation date that is projected within the proposal, as evidenced by documents filed by the bidder showing the following:

The Project is highly likely to achieve the January 1, 2031 Guaranteed COD, as evidenced through the following key milestones:

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

i. Commencement of permitting processes;



The Sponsor has already commenced key permitting-related activities by identifying all required permits (see Table 7-2), developing a permitting timeline (see Table 7-1), performing desktop environmental studies, and conducting onsite investigations. Additionally, the Sponsor has already completed initial steps under the EFSB's new permitting process: Sponsor formally initiated the Pre-filing Outreach Period on September 8, 2026. The Sponsor has also begun preparation of key permit applications and has engaged [REDACTED] an environmental consulting firm with unmatched expertise with the EFSB adjudicatory process, to lead all federal, state, regional, and local environmental permitting for the Project.

ii. **A plan for completing all permitting processes;**

The Sponsor has developed a practical permitting schedule and initiated environmental and siting due diligence to support timely filing and receipt of all required approvals. The Project's permitting schedule is designed to support on-time delivery of the Project. The Project's anticipated timeline for submitting each required federal, state, regional, and local permit application is provided in Table 7-1, which serves as the plan for completing the Project's permitting processes.

A central component of the permitting plan is preparation and filing of the Project's EFSB Consolidated Permit Application, which the Sponsor is already beginning to prepare. The 2024 Climate Act provides the EFSB with the authority to issue all individual state, regional, and/or local permits necessary for Large Clean Energy Storage Facilities (LCESFs) like the Project. The review period for the EFSB Consolidated Permit Application is established by statute and implementing regulations. Once the Project's Consolidated Permit Application is filed with the EFSB, the EFSB will make a Completeness Determination within 30 days. Once EFSB issues a Notice of Completeness for the Project's Consolidated Permit Application, EFSB must issue a Final Decision within 15 months. If EFSB fails to meet this statutory deadline, the Project will receive a Constructive Approval (an automatic approval) in accordance with 980 CMR 17.00. This defined 15-month statutory review timeline for all state, regional, and local permits provides considerable certainty for the Project's permitting timeline and supports Sponsor's conclusion that the Project can come online by the target COD.

In addition to the state, regional, and local permits addressed through the EFSB Consolidated Permit Application, the Sponsor has evaluated the potential federal permits and approvals that may be required for the Project. Based on the Project's use of the Canal Generating Station site and related interconnection infrastructure, the Project is not expected to require an overly complex or extensive federal permitting process. Any required federal permit applications will be submitted in 2028, well in advance of the target COD, and coordinated with the overall permitting schedule shown in Table 7-2. The Project's permitting plan and timeline are further discussed in Section 7.8.

iii. **Environmental assessment;**

The Sponsor has already performed desktop environmental studies and conducted onsite investigations, including wetland delineation. This initial environmental assessment work

demonstrates that the Project is located within a previously developed, heavily disturbed industrial area that does not contain significant natural resources. For example, based on a review of MassGIS data layers, the Project site does not contain any Natural Heritage and Endangered Species Program (NHESP) certified vernal pools, potential vernal pools, Public Water Supplies, Zone I or Zone II Wellhead Protection Areas, Interim Wellhead Protection Areas (IWPAs), Surface Water Supply Protection Areas (Zones A, B, or C), or Outstanding Resource Waters. The Project site also does not contain any NHESP Priority Habitat of Rare Species, NHESP Estimated Habitat of Rare Wildlife, Areas of Critical Environmental Concern (ACECs), BioMap Core Habitat, or BioMap Critical Natural Landscape. Overall, the Project site is considered highly suitable for a BESS project, such that minimal impacts, if any, are expected.

- iv. Viable financing plans along with detailed information requested in Section 2.2.2.4;

[REDACTED]

- v. Viable installation and electrical interconnection plans

The Project will use SIS associated with the existing POI for Canal Unit 2 and will interconnect on the high-voltage side of the existing unit main power transformer through a new 34.5 kV collector system and 34.5/345 kV GSU. The Project will then connect to the grid using an existing generator tie line from Canal Unit 2 to the existing Eversource 345 kV switchyard located immediately south of the Canal Generating Station.

- vi. Material progress towards the acquisition of all real property rights; and

[REDACTED]

- vii. Evidence of material vendor activity.

[REDACTED]

[REDACTED]

[REDACTED]



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.

Activities already started include site and layout definition, preliminary engineering, independent electrical studies, environmental desktop review and field investigations, EFSB pre-filing outreach, community and first-responder engagement,  and design activity, EPC and owner-engineer engagement, project scheduling, tax and supply-chain diligence, and sponsor-equity funding of development.

Please see Attachment A-10-1 - Critical Path Schedule for a detailed schedule of all critical path items.

SECTION A-11: CONSTRUCTION AND LOGISTICS

This section of the proposal addresses necessary arrangements and processes for assembly, and deployment of major project components, including the Energy Storage System and all equipment required for the system to fulfill its operational plan, and other major components associated with delivery facilities.

Please provide a construction plan that captures the following objectives. If the project is being developed in phases, please break out the construction plan for each phase. Please answer the following questions in Section A-11 for each Transmission Project and Distribution Project being bid:

11.1 Please list the major tasks or steps associated with deployment of the proposed project and any necessary specialized equipment.

Major deployment steps are: mobilization and controls; survey, geotechnical confirmation and environmental protection; demolition/relocation of conflicting minor facilities if required; grading, drainage, erosion control and underground utilities; roads, pads, foundations, fencing, lighting and fire-water work; station service and control building; GSU foundation and transformer delivery/assembly; 345 kV tie-in; 34.5 kV duct banks/cable and switchgear; delivery and setting of battery/PCS blocks; communications, protection, SCADA and cybersecurity integration; grounding and lightning protection; pre-energization inspection; backfeed and energization; block, plant, capacity, efficiency and reliability tests; ISO-NE/Transmission Owner testing; site restoration; and turnover.

Specialized equipment may include heavy-haul transport, cranes sized for the GSU and modular enclosures, self-propelled modular transporters or multi-axle trailers, cable-pulling/tensioning equipment, transformer oil-processing equipment, relay-test sets, high-voltage test equipment, temporary power, fire/life-safety test equipment, and commissioning load/measurement equipment.

The construction schedule and critical path are included in Attachments A-10-1 through A-10-3.

11.2 Please describe the proposed approach for staging and deployment of major project components to the project site.

The EPC contractor will develop a logistics plan that separates operating-plant traffic, public roads, construction deliveries, worker parking, heavy-haul routes, crane zones, emergency access, and secured equipment storage. Major components will be delivered in sequenced lots matched to foundation and electrical readiness to minimize double handling and onsite inventory. The GSU and other oversized loads will follow a surveyed port/highway/site route with bridge, turning, grade, overhead-clearance, permit, escort, and seasonal restrictions addressed.

Laydown will use disturbed areas within the Canal Generating site where practicable. Battery enclosures will remain within manufacturer's environmental limits, be inspected on

receipt, and be tracked by serial number. Work near operating Canal Generating and Eversource facilities will use outage planning, permit-to-work, lockout/tagout, qualified electrical personnel, and defined interface boundaries. Emergency access and fire-water availability will be maintained throughout construction.

11.3 List the party (e.g. the bidder, or equipment/service providers under contract to the bidder) responsible for each deployment activity and describe the role of each party. Describe the status of bidder's contractual agreements with third-party equipment/service providers.

The Sponsor and its 100% indirectly-owned subsidiary, the Bidder, will be responsible for development, contracting, financing, stakeholder commitments, governance, and final acceptance. [REDACTED] will manage technical requirements, design review, quality surveillance, schedule/cost control, commissioning oversight, and independent acceptance. The EPC contractor will be responsible for detailed design, procurement, construction, subcontractor management, safety, quality, testing, and turnover within the contracted scope.

[REDACTED]

[REDACTED]

SECTION A-12: OPERATIONS AND MAINTENANCE

Projects that can demonstrate that the operation and maintenance (“O&M”) plan, level of funding, and mechanism for funding will ensure reliable operations of all aspects of the project during the term of the contract are preferred.

Please answer the following questions in Section A-12 for each Transmission Project and Distribution Project being bid:

12.1 Provide an O&M plan for the project that demonstrates the long-term operational viability of the proposed project. The plan should include the location of the O&M base, a discussion of the staffing levels proposed for the project, the expected role of the project sponsor or equipment manufacturer/outside contractor, scheduling of major maintenance activity, and the plan for testing equipment.

The Project will use a hybrid O&M model combining the Sponsor’s existing Canal Generating site capability with OEM and specialist support. The primary O&M base will be the Canal Generating Station at 9 Freezer Road, Sandwich, Massachusetts. This location provides secure access, established operating procedures, site knowledge, emergency coordination, contractor control and proximity to the BESS and 345 kV interface.

A 24-hour remote operations function will monitor alarms, dispatch, SOC, market status, weather, and security. Existing Canal Generating personnel and dedicated, or cross-trained BESS technicians will perform routine rounds, switching under approved procedures, first response, minor corrective work, contractor control, and emergency coordination. [REDACTED]

[REDACTED] OEMs will provide remote diagnostics, software support, warranty service, planned maintenance, technical escalation, and major corrective work under a Long Term Services Agreement (LTSA).

The maintenance program covers batteries/BMS, PCS, HVAC/cooling, MV/HV equipment, transformer dissolved-gas/oil testing, breakers and relays, revenue meters, fire/life-safety systems, UPS/DC systems, communications/cybersecurity, grounding, drainage, roads, fencing, vegetation, and security.

Testing will include commissioning baseline capacity and efficiency, periodic usable-energy/capacity tests, inverter and plant-controller response, protection and trip tests, reactive capability, telemetry and dispatch, fire alarm/emergency shutdown, backup power, cyber recovery, and annual emergency exercises. Maintenance and augmentation will be scheduled to reasonably protect CPEC windows and annual availability.

[REDACTED]

The Project’s overall preliminary O&M plan has been included as Attachment A-12-2.

12.2 Describe in detail the proposed O&M funding mechanism and funding levels to support planned and unplanned O&M requirements.

O&M will be funded as an essential project operating expense through the annual budget and financial model. The base budget will include fixed site staffing/shared services, OEM long-term service charges, scheduled maintenance, vegetation and security, software / communications, inspections and testing, GIS/ISO costs, insurance, property taxes, spare parts, augmentation, and decommissioning funding.

The Project will maintain working capital and contingency for unplanned corrective work and insurance deductibles, plus dedicated or earmarked reserves for major maintenance and battery augmentation as required by financing documents. Annual budgets will be approved before each operating year and updated using condition data, warranty findings, OEM service plans, and lifecycle forecasts.

[REDACTED]

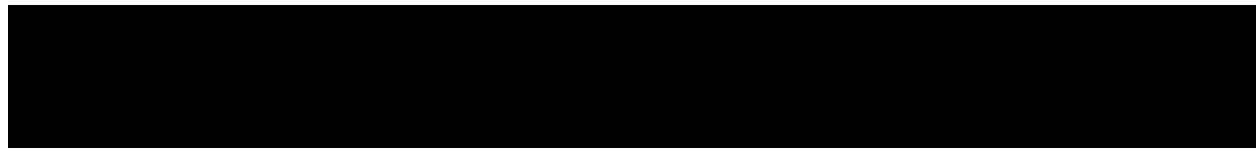
12.3 Describe the terms (or expected terms) of the warranties and/or guarantees on major equipment that the bidder is utilizing or proposing to utilize.

[REDACTED]

[REDACTED]

[REDACTED]

12.4 Describe the status of the project sponsor in securing any O&M agreements or contracts. Include a discussion of the sponsor's plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.



12.5 Provide examples of the bidder's experience with O&M services for other similar projects.

The Sponsor owns and operates power facilities across the United States, including the Canal Generating Station.

Please see Attachment A-12-3 for a detailed list of projects and O&M experience.

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 to 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.

13.1 Provide an organizational chart for the project that lists the project participants and identifies the corporate structure, including general and limited partners.

Please see Attachment A-13-1 for the Project's staffing plan. A detailed overview of the Project's organizational structure is provided in Section 5.

13.2 Provide statements that list the specific experience of the bidder and each of the project participants (including, when applicable, the bidder, partners, and proposed contractors), in developing, financing, owning, and operating generating and delivery facilities, other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.

The Sponsor's Project team represents decades of experience in development, investment, operations, regulatory, and legal aspects for large scale power projects in the US. [REDACTED]

Number of Years in Relationship	Percentage of Respondents
1-2	25%
3-4	35%
5-6	45%
7-8	50%
9-10	40%
11-12	30%
13-14	25%
15-16	55%
17-18	100%

[illegible]

12. [REDACTED]

13.3 Provide a management chart that lists the key personnel dedicated to this project and provide resumes of the key personnel. Key personnel of the bidder's development team having substantial project management responsibilities must have:

- i. Successfully developed and/or operated one or more projects of similar size or complexity or requiring similar skill sets; and
- ii. Experience in financing power generation projects (or have the financial means to finance the project on the bidder's balance sheet).

Resumes of key personnel supplied by the Sponsor are included as Attachment A-13-2. They document project development, engineering, finance, commercial, permitting, safety, construction, and operations experience.

13.4 Provide a listing of all projects the project sponsor has successfully developed or that are currently under construction. Provide the following information as part of the response:

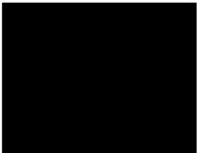
- i. Name of the project
- ii. Location of the project
- iii. Project type, size and technology
- iv. Commercial operation date
- v. Availability factor of the project for the past three years
- vi. Safety record
- vii. References, including the names and current addresses and telephone numbers of individuals to contact for each reference.

Table 13-1 shows the Sponsor's experience where it served in developer capacity. Table 13-2 shows the availability and safety record for all power projects operated by the Sponsor, including through acquisitions or investments. The evaluation team may reach out to [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



13.5 If the bidder's previous project experience is primarily or entirely outside of Massachusetts and/or the Northeast, describe how the skills and perspectives of this non-local experience will be beneficial to successfully developing the bid(s) under this RFP.

The Sponsor owns and operates the Canal Generating Station in Massachusetts, as well as two other generating assets in Massachusetts and three additional assets across the Northeast, providing it with direct experience pertaining to ISO-NE markets, New England reliability requirements, Massachusetts regulators, local stakeholders, severe-weather operations, and regional transmission owners. Non-local BESS and power experience adds scale in procurement, construction, project finance, tax-credit structuring, safety, and multi-market storage operation.

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

- i. Construction Period Lender

[REDACTED]

- ii. Operating Period Lender and/or Tax Equity Provider

[REDACTED]

- iii. Financial Advisor

[REDACTED]

- iv. Environmental Consultant

[REDACTED]

- v. Facility Operator and Manager

[REDACTED]

[REDACTED]

vi. Owner's Engineer

[REDACTED]

vii. Transmission/Delivery Consultant

[REDACTED]

viii. Legal Counsel

[REDACTED]

13.7 Describe the experience and expertise of the bidder and project team needed to successfully develop, finance, construct, and operate and maintain its proposed eligible project on schedule and according to the bidder's commitments to a competitive procurement process. Describe the Bidder's continuity of corporate management through successful project development.

[REDACTED]

[REDACTED]



13.8 Describe the Bidder's track record developing similar projects, including consideration of any project delays, amendments, defaults, and performance issues, including on prior long-term contracts. Describe any prior failures to achieve commercial operation dates under other contracts and provide a credible description of how the current proposed project will avoid similar project delays or development issues if applicable.

The Bidder is a newly formed SPV and has no completed-project track record of its own. Relevant Sponsor and team experience is described above in Sections 12 and 13. Bidder or its Affiliate has not had any delays, default, or performance issue in development of similar projects.

13.9 Describe the bidder's relevant experience supporting similar projects in a state or federal regulatory or judicial forum. This experience can be established with examples of one or more key member(s) of the development team advocating in favor of a similar project in a regulatory proceeding, before a court, or in another tribunal.

The Sponsor has relevant experience participating in Massachusetts policy and regulatory proceedings concerning Surplus Interconnection Service and use of existing Canal Generating Station infrastructure.

The Project team also includes counsel and consultants experienced before FERC, ISO-NE stakeholder processes, Massachusetts DPU/EFSB/MEPA agencies, and local authorities for large energy infrastructure. This experience is relevant because the Project requires coordinated federal market/interconnection compliance and a Massachusetts consolidated siting proceeding.

13.10 If the bidder or any of its past or present affiliates has either (1) been involved with a complex development project that failed, was withdrawn, or otherwise did not proceed, or (2) defaulted under, or agreed to terminate a contract for a complex development project, then the bidder should provide relevant details.

The Bidder or its Affiliates have not failed, withdrawn, defaulted under, or terminated a complex development project or contract.

SECTION A-14: ECONOMIC DEVELOPMENT AND EMPLOYMENT BENEFITS, TRANSITIONING FOSSIL FUEL COMMUNITIES, BENEFITS TO LOW INCOME RATEPAYERS AND ENVIRONMENTAL JUSTICE COMMUNITIES, AND OTHER BENEFITS

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 Project will provide meaningful employment opportunities in the Commonwealth and represents a significant opportunity for Massachusetts-based workers.

Project Development & Construction

[REDACTED]

[REDACTED]

14.12 Please describe experience with stakeholder engagement showing demonstrated past and current productive relationships with environmental, commercial and residential stakeholders, federally recognized and state acknowledged tribes, Environmental Justice, and track record of avoiding, minimizing, and mitigating environmental, tribal, environmental justice, and onshore impacts from projects similar to the proposed project.

[REDACTED]

[REDACTED]

[REDACTED]

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,

As described in Section 7.8.1, the Project's EFSB Consolidated Permit Application will include a comprehensive environmental assessment, which will address the Project's potential benefits and impacts on natural resources, including wetlands, waterbodies, water supply resources, terrestrial wildlife and habitat, and air quality, as well as the human environment. To support the Application's development, the Project has completed several desktop studies and onsite investigations, including wetland delineations, vernal pool surveys, wildlife and habitat evaluations, natural resource inventories, an acoustical screening review, and an assessment of cultural and archaeological resources. A preliminary characterization of the Project's potential environmental impacts and proposed measures to avoid, minimize, and mitigate those impacts are provided below. These preliminary avoidance, minimization, and mitigation measures will be refined in consultation with the EFSB, state, regional, and local agencies, key stakeholders, and the community during the Project's permitting process.

14.13.1 Wetlands, Waterbodies, and Water Supply Resources

Based on MassGIS data layers, nearly the entire Project site is within the 100-year floodplain (FEMA National Flood Hazard Layer Zone AE); however, it does not contain any wetlands mapped by the MassDEP. A formal wetland resource area delineation was conducted by Epsilon in September 2026 and will be subject to confirmation by the local Conservation Commission. The Project will need to comply with applicable performance standards designed to protect these wetland resource areas, which are identified in 310 CMR 10.00, the Town of Sandwich's Wetland Bylaws, and the Sandwich Conservation Commission Regulations. In addition to meeting the performance standards, preliminary measures to avoid, minimize, and mitigate the Project's potential wetlands impacts include:

- designing and siting project components to avoid and minimize direct impacts to wetlands, while complying with applicable local setback requirements and incorporating alternatives analysis and mitigation measures to address any unavoidable impacts;
- ensuring that the proposed design incorporates measures to mitigate potential impacts of climate change and is resilient to its anticipated effects;
- designing the Project's stormwater management system to meet MassDEP's Stormwater Management Standards and the Town of Sandwich's Stormwater Best Management Practices (BMP) Guidelines, assuming the existing stormwater management system will need to be modified due to the Project;
- preparing a construction-period Soil Erosion and Sediment Control Plan per MassDEP's Stormwater Management Standards;
- developing a Project-specific Stormwater Pollution Prevention Plan (SWPPP), which identifies controls and construction BMPs to mitigate the potential for erosion and sediment entering wetlands and water resources during construction;
- minimizing the creation of new impervious surfaces;
- installing secondary containment for oil-containing equipment (e.g., transformers);
- developing a Spill Prevention, Control, and Countermeasure (SPCC) Plan to ensure that all chemicals and hazardous materials are handled in accordance with local, state, and federal laws;
- requiring that all equipment refueling, servicing, or cleaning occur outside of wetland resource areas;
- locating soil and construction material stockpiles outside of wetland resource areas, where feasible;
- following BMPs for landscape management that incorporate water conservation measures and minimize the use of pesticides and chemical fertilizers;
- following BMPs for snow removal and deicing to protect wetland resource areas and water resources; and/or

- using a qualified environmental inspector to perform site inspections and ensure compliance with the Project's SWPPP, and federal, state, and local permit requirements.

As described in Section 7.5, the Project is within an EPA-designated Sole Source Aquifer, but otherwise avoids water resources, including Public Water Supplies, Wellhead Protection Areas, Surface Water Supply Protection Areas, Outstanding Resource Waters, PPSWAs, Impaired Areas, Contributing Area to Ponds, and Marine Water Recharge Areas. The Project has minimal potential to impact water resources, particularly if the above avoidance, minimization, and mitigation measures are implemented.

14.13.2 Other Ecological Resources/Natural Habitat

The Project is well-sited with respect to ecological resources, as the Project site is a previously developed, heavily disturbed industrial area that does not contain significant natural resources (see Section 7.5). As the Project largely avoids impacts to significant natural resources, extensive measures to minimize and mitigate impacts on natural resources are not anticipated to be required. The Sponsor will evaluate the feasibility of retaining trees along the Project boundaries and will minimize vegetation/tree removal and alteration of natural topography to the extent possible.

14.13.3 Air Quality

Normal operation of the Project is not expected to generate harmful air pollutants. BESS are an important component of the electrical infrastructure needed to meet the Commonwealth's emission reduction goals, including the Commonwealth's net zero by 2050 greenhouse gas emission reduction target established pursuant to the Global Warming Solutions Act. According to DOER's and MassCEC's recent report,²⁰ "energy storage can support increased intermittent renewable generation through renewable energy firming and the reduction of emissions in the electric sector." With the rise of renewable energy generation in New England, during daily peak periods, energy storage projects will increasingly be able to charge from clean power off-peak and displace emitting generation (i.e., oil and gas generating facilities). The displacement of GHG emissions from oil and gas facilities will ultimately help mitigate effects of climate change (e.g., severe heat waves and drought, sea level rise and increased flooding, more frequent and dangerous storms, changes in agricultural productivity, ocean acidification, and shifts in species' distributions) and harmful air pollutants (e.g., nitrogen oxides, sulfur dioxide, and fine particulate matter) linked to health conditions (e.g., respiratory disorders, asthma, stroke, heart attacks, and early death) and that contribute to ground-level ozone/smog and acid rain.

The construction of the Project will result in temporary and localized air emissions from vehicles and construction equipment. Preliminary measures to minimize and mitigate the Project's potential air quality impacts include:

²⁰ [Charging Forward: Energy Storage in a Net Zero Commonwealth | Mass.gov](#)

- complying with Massachusetts anti-idling regulations (310 CMR 7.11(1)(b)), which limit vehicle idling to five minutes (except where specific regulatory exceptions apply);
- requiring diesel-powered non-road construction equipment rated at 50 horsepower or greater and used for 30 or more days to be certified to meet EPA Tier 4 emission standards or have EPA-verified emission control technologies, where applicable;
- using ultra-low sulfur diesel fuel in diesel-powered construction equipment; and
- implementing BMPs to minimize airborne dust, such as installing anti-tracking pads at roadway egress points, regular roadway sweeping, covering dump trucks, stabilizing or covering soil stockpiles, and using water trucks with misters (where necessary) to suppress dust in active work areas.

14.13.4 Burdened Areas & Environmental Justice Areas

There are no Burdened Areas (BAs) or Environmental Justice (EJ) areas within 1 mile of the Project site. Therefore, the Project is well-sited with respect to BAs and EJ areas and detailed analysis of potential impacts to BAs and EJ areas is not expected to be necessary as part of the Project's EFSB Consolidated Permit Application.

14.13.5 Noise Impacts

Based on a screening-level acoustic assessment performed for the Project, with the implementation of minimization and mitigation measures, the Project will comply with MassDEP's Noise Policy, which currently limits the increase over ambient to 10 decibels (A-weighted) or less and prohibits the creation of new 'pure tone' conditions. Measures to minimize and mitigate the Project's potential noise impacts are anticipated to include:

- siting BESS equipment as far as possible from the property lines;
- utilizing low-noise BESS equipment, using equipment silencers, and/or throttling equipment fans;
- installing sound barriers (i.e., sound walls) between the equipment and the property line; and/or
- using the quietest commercially available construction equipment and locating construction equipment as far from adjacent sensitive receptors as practicable.

14.13.6 Visual Impacts

Depending on the height of the Project's infrastructure, the Project may be visible from surrounding vantage points, particularly from recreational areas (e.g., Cape Cod Canal, Cape Cod Canal Bikeway, Sandwich Recreational Area, and Sandwich Marina) to the north and east. Existing vegetation along the northern and eastern boundaries of the Project site may provide some visual screening from these vantage points. Nevertheless, views towards the proposed Project from the north and east are already dominated by the existing Canal Generating Station, which includes transmission towers, transmission lines, and other industrial infrastructure. As the Project's infrastructure would be similar to and compatible

with existing infrastructure on the property, the Project's incremental visual impact may not be noticed by casual observers. Forested areas south of the Project area likely block views from residences located to the south. The Canal Generating Station likely blocks views of the Project from the west. To confirm this, the Company will perform a visual assessment that includes visual simulations of the Project from key vantage points as part of the Project's Consolidated Permit Application. To the extent that the Project is visible, additional preliminary measures to minimize and mitigate the Project's potential visual impacts include:

- preserving and/or enhancing existing vegetative buffers along the Project area's boundaries;
- blending equipment in with the surroundings by using materials and colors that are compatible with the existing Canal Generating Station; and/or
- minimizing construction and operational-related lighting.

14.13.7 Traffic and Transportation Impacts

Construction and operational vehicles and equipment are expected to access the Project site via Freezer Road and Tupper Road. A review of traffic considerations mapped on the Cape Cod Commission's Regional Policy Plan Data Viewer identified that a shared use path is proposed along Freezer Road. The Cape Cod Central Railroad crosses Freezer Road south of the Project site's entrance. Based on traffic analyses prepared for similar BESS projects, traffic impacts due to the construction of the Project and occasional on-site maintenance visits during operations are expected to be minimal. No delays to local traffic are expected except where the delivery vehicles may need to travel on narrow roadways, or when there is an occasional oversized vehicle. Nevertheless, a Transportation Impact Assessment is expected to be required for the Project as part of the Project's DRI Application.

Overall, traffic impacts due to the construction of the Project and occasional on-site maintenance are expected to be minimal, particularly with the implementation of measures to minimize and mitigate the Project's potential traffic impacts. These measures preliminarily include:

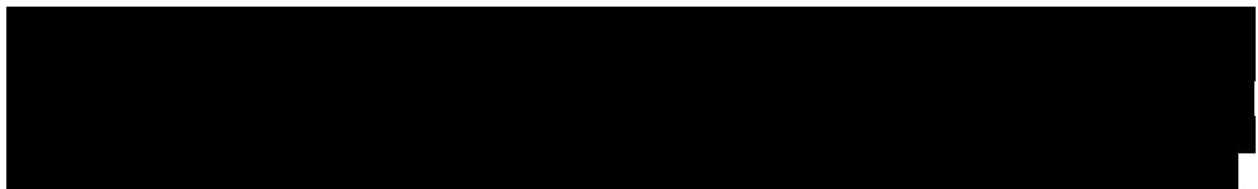
- working with the Town of Sandwich to develop a Traffic Management Plan (TMP), which would describe measures to minimize vehicular impacts (e.g., designated speed limits, staggered arrival and departure times, proper vehicle maintenance protocols, carpool incentives, on-site parking plans, etc.);
- coordinating with the Town regarding the timing of construction activities, particularly with respect to large equipment (e.g., batteries, transformers) and construction machinery that could inhibit local traffic;
- using commercially reasonable efforts to ensure that large trucks, heavy equipment and machinery, and oversized loads traveling to and from the Project site use state-numbered routes (as opposed to local roads) where possible;
- coordinating the timing and sequencing of work with the Town regarding their plans to install a shared use path along Freezer Road; and/or

- using various methods of public outreach (e.g., Project website) to keep residents, business owners, and officials updated on the Project's construction schedule and other traffic management information.

14.13.8 Electric and Magnetic Fields

Operation of the Project's BESS and Interconnection Facilities will generate electric and magnetic fields (EMF). As found in previous EMF studies for similar BESS projects, most Project-related sources of electric fields are anticipated to be fully contained within metallic or insulated coverings located inside the Project's fenceline boundary. As the distance from the Project's electrical equipment and Transmission Interconnection Lines increases, magnetic field levels are expected to diminish rapidly. Therefore, by siting the Project away from neighboring residences, with the closest residence over 500 ft to the south, the Company has minimized any potential Project-related EMF that would be experienced at the closest residences. The Company will engage consultants to prepare an EMF assessment (including magnetic field modeling) for the Project, which will be included in the Project's Consolidated Permit Application.

14.13.9 Impacts to Cultural and Historic Resources



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.



[REDACTED]

SECTION A-15: EXCEPTION TO FORM LONG-TERM CONTRACT

For Transmission Projects, please attach an explanation of any exceptions to the Form Long Term Contract set forth in Appendices B-1 and B-2. Comments to the proposed Form Long-Term Contract must include any specific alternative provisions in a redline format to the Form Long-Term Contract. If the bidder is proposing a phased project with each phase covered by a separate contract, the bidder should provide separate contracts for each phase with specific alternative provisions to the Form PPA in redline format.

Bidders are discouraged from proposing material changes to the Form Long-Term Contract. As provided in Section 2.2.5, the Distribution Companies reserve the right to reject certain mark-ups that add additional cost or risk. Selection of a project does not mean acceptance of the Bidder's mark-ups as bid.

Bidders of Distribution Projects may not change the Form Long-Term Contract.

Please see Attachments A-15-1 and A-15-2 for exceptions to Eversource and National Grid Storage Environmental Attribute Purchase Agreements, respective.