COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD
FIRST SET OF INFORMATION REQUESTS OF
ENERGY FACILITIES SITING BOARD TO
MORAGA STORAGE, LLC
EFSB 25-07

(DECEMBER 10, 2025)

DEFINITIONS

For purposes of these and all subsequent Information Requests in this proceeding:

1. "Project" refers to the construction, operation, and maintenance of a (1) up to 180 megawatt, four-hour duration (for a combined energy amount of 720 megawatt-hours) battery energy storage system; and (2) related electrical infrastructure, including a new substation and a line tap, all as defined in the Notice of Adjudication and Public Comment Hearing.

2. "Company" refers to Moraga Storage, LLC ("MS").

PRELIMINARY EXHIBIT DESIGNATIONS

The documents below bear exhibit numbers as indicated. Later in the proceeding, the Company will incorporate these designations into the Draft Exhibit List for the case.

Exh. MS-1	Analysis to Support Petitions
Exh. MS-A	Attachment A
Exh. MS-B	Attachment B
Exh. MS-C	Attachment C
Exh. MS-F	Attachment F
Exh. MS-H	Attachment H

INSTRUCTIONS

The following instructions apply to this set of Information Requests and to all subsequent Information Requests issued by the Energy Facilities Siting Board ("Siting Board") to any party in this proceeding. The instructions apply equally to any set of Information Requests issued by any of the parties.

1. The caption to each response should include the following: a verbatim recitation of the Information Request; the Information Request number; the docket number of the case; the date of the response; and the name of the person(s) responsible for the response.

2. All Information Request responses must be submitted in a ***searchable*** electronic file format unless the Presiding Officer grants permission otherwise.

3. For easier archiving in the Department of Public Utilities' Electronic File-room, submit each response to the Information Requests both as a ***separate*** electronic file and as part of a single compiled electronic file containing responses to all the Information Requests. The individual response filename should be identical to the information request number. For example, information request EFSB-G-1 corresponds to a response with a filename "EFSB-G-1" and no other text.

4. Provide all data, assumptions, and calculations you rely upon. Provide the source of, and basis for, all data and assumptions you employ. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work papers.

5. References in the Information Requests below to the "Company" encompass not only the Company itself but those who are acting on behalf of the Company or at the Company's request, e.g., consultants, agents, contractors.

6. You must file Responses within two weeks of the date that these Information Requests are issued. If you cannot completely answer a particular response by the due date, provide a brief written explanation, together with the expected date of filing, at the time you file your responses.

7. The Information Requests and any Record Requests asked during evidentiary hearings are continuing. Thus, if a party responds to a Request, and later receives or generates additional information that also is responsive to the Request, the party ***must*** file a Supplemental Response containing that information. This obligation continues until the hearing record is officially closed.

8. When including attachments, supplements or revisions to responses, follow the numbering convention in the example below pertaining to Information Request EFSB-A-1 (where "A" refers to "Air"):

    a. For the responses itself: EFSB-A-1

    b. For attachments: EFSB-A-1(1) for attachment 1; EFSB-A-1(2) for attachment 2, etc.

    c. For supplemental responses: EFSB-A-1(S1) for the first supplemental response; EFSB-A-1(S2) for the second supplemental response, etc.

    d. For a revised response: EFSB-A-1(R).

9. For all maps, include a north arrow, an accurate scale, a detailed legend, the source of the data, and the date the map was published, if applicable.

10. If a particular Information Request is unclear or ambiguous, a party may contact the Presiding Officer for clarification.

11. Please submit responses to the Information Requests according to the instructions in the Filing and Service List.

The text of the e-mail must specify: (1) the docket number of the proceeding (EFSB 25-07); (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document. The electronic filing should include the name, title, and telephone number of a person to contact in the event of questions about the filing. All documents submitted in electronic format will be posted on the website of the Department of Public Utilities, at: https://eeaonline.eea.state.ma.us/dpu/fileroom/#/dockets/docket/12514.

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General

EFSB-G-1 Provide a Gantt chart for the Project that illustrates the anticipated duration of each phase of the Project, including governmental authorizations (e.g., permits, licenses, and approvals), each construction stage, and key post-construction milestones, including testing and commissioning.

EFSB-G-2 Refer to Exh. MS-1, at 12. Provide an update to Table 3-1: List of Permits/Regulatory Reviews Required. In doing so, add a new column with expected dates of issuance.

EFSB-G-3 Refer to Exh. MS-1, at 32. Does Moraga Storage, LLC or its parent company own and operate any other standalone battery energy storage system ("BESS") facilities? If yes, please provide the project locations, size, and years in operation. If no, please indicate whether the Project would be the first BESS project the Company would own and operate.

EFSB-G-4 Describe the proposed operation and maintenance phase of the project. What, if any, aspects of the Project's operation and maintenance would the Company delegate to a third-party vendor during normal day-to-day operations?

EFSB-G-5 Refer to Exh. MS-1, at 45-46. Provide an update to Table 10-1: Project Outreach Meetings, including the Company's outreach to the community, if any, since March 19, 2025.

EFSB-G-6 Describe the Company's public outreach strategy during all phases of Project approval, planning, design, construction, operations, and decommissioning. Specify the following: (a) target groups; (b) current and desired partnerships; (c) methods of engagement; (d) educational initiatives; (e) feedback methods; and (f) outreach monitoring and evaluation.

EFSB-G-7 Describe the status of this Project's interconnection agreement and list any anticipated utility upgrades that would be needed for the Company to interconnect this Project.

12. Refer to MS-1, at 41. Describe how this Project could impact electric distribution ratepayers in Oakham and surrounding communities.

EFSB-G-8 Discuss new tariffs, duties, modifications to tax credits, and other policy and/or economic shifts that could affect (or are currently affecting) supply chain availability, costs, contract prices, vendor relationships, or other critical Project factors.

EFSB-G-9 Provide the anticipated typical profile of charging hours and discharging hours.

EFSB-G-10 Describe whether the Company addresses potential Project vulnerabilities to climate change, such as checking the Project against the ResilientMass Climate and Hazard Viewer ("RMAT") and including relevant recommendations from state and local hazard mitigation plans.

13. Refer to Exh. MS-1, at 13. The following questions address Project decommissioning.

a. Describe the decommissioning process for this Project in terms of: (1) funding arrangements and assurance against facility abandonment and incomplete restoration of the Project site; (2) anticipated life of the facility and period when decommissioning of the facility would occur; (3) duration of the decommissioning process; (4) main decommissioning steps, including transport/disposal of all materials, repurposing/restoration of the Project site; (5) safety risks and how the Company would address them; and (6) any other key aspects of the decommissioning process.

b. What is the status and timeline for a developing a decommissioning plan for the Project?

EFSB-G-11 Describe the manner in which the Project addresses relevant provisions in St. 2024, c. 239 (the "2024 Climate Act").

EFSB-G-12 Does the Company anticipate having a financial mechanism in place to ensure it has adequate financial resources in the unlikely event of an emergency incident resulting in significant onsite and/or offsite environmental, personal, or property damages? Please describe.

14. What types and amounts of liability insurance coverage does the Company intend to have related to the Project or the Property?

Zoning

EFSB-Z-1 Refer to Exh. MS-1, at 33. Describe the potential for the Company to combine the BESS Project with a Large-Scale Solar Installation on the 42.9-acre parcel or adjacent land? Explain.

EFSB-Z-2 Refer to Exh. MS-1, at 33-34.

a. State the reasons why the Project must deviate from the height requirements of Section 5.2 of the Zoning Bylaw.

b. What modifications would the Company have to make to the Project to comply with the height requirements of Section 5.2 of the Zoning Bylaws?

c. What, if any, adverse consequences of compliance would there be, either to the Company or to the Town or otherwise?

EFSB-Z-3 Refer to Exh. MS-1, at 34.

a. State the reasons the Project must deviate from the setback requirements of Section 5.3 of the Zoning Bylaw?

b. What modifications would the Company have to make to the Project to comply with the setback requirements of Section 5.3 of the Zoning Bylaws?

c. What, if any, adverse consequences of compliance would there be, either to the Company or to the Town or otherwise?

EFSB-Z-4 Refer to Exh. MS-1, at 34. In what ways, if any, does the Project Site's 42.9-acre parcel comply with the requirements of Section 5.5.1? In what way(s) does the parcel not conform with the requirements of Section 5.5.1?

Project Need

EFSB-N-1 Identify the substations that National Grid Line A127-4 connects to.

EFSB-N-2 Refer to Exh. MS-1, at 40 regarding the state's energy storage goals.

a. Describe where Massachusetts currently stands with regard to the 1,000 MWh by December 31, 2025 goal and 5,000 MW energy storage procurement target for 2030?

b. Does the Company intend to submit this Project as a bid for the state storage procurement? If yes, discuss the requirements for this bid and the expected timing of the bid process.

EFSB-N-3 Refer to Exh. MS-1, at 42 regarding the Project's consistency with the Massachusetts Clean Peak Standard ("CPS"). Provide further details on how the Project would contribute to the Clean Peak Program. Discuss what registration with the Clean Peak Program requires of the Company.

EFSB-N-4 Refer to Exh. MS-1, at 42-43.

a. Describe other markets, services, and incentive programs the Project intends to participate in. To the extent that participation in any such markets, services or incentive programs may affect or limit the Project's degree of participation in other such activities or involvement, please identify and describe such effects and limitations.

b. Are there instances that the Company may choose not to discharge electricity to the grid at times of market need, or when called upon by ISO New England? If so, describe those circumstances.

EFSB-N-5 Would the Project be able to provide "black start" capability for the power grid in restoring service during an outage?

15. What are the tax revenues that the Company projects the Town of Oakham and the state would receive from the Project? Would the Project provide any other socioeconomic benefits for the Town of Oakham or the state?

Project Alternatives

EFSB-PA-1 Has the Company considered energy storage technologies other than lithium-ion batteries? If so, elaborate and explain why the Company did not select such technologies. If not, why not?

Site Selection

EFSB-SS-1 Refer to Exh. MS-1, at 18. The Company ruled out Candidate Site 2, citing only the lack of previously developed areas as the reason. While the Preferred Site was formerly a junk yard, it appears that the proposed BESS layout is located largely on an undeveloped and forested area within the Project parcel. Based on the above, elaborate on the advantage of the Preferred Site over Candidate Site 2.

Reliability

EFSB-R-1 Would the batteries draw auxiliary power from the transmission circuit the Project is interconnecting to or from a local distribution circuit?

a. In the event of loss of power on this circuit, do the battery units have a backup power source? If so, please describe the backup power source and expected duration of backup power for the battery units.

b. Which systems (and other features) would rely upon backup power during a potential failure?

Project Design

EFSB-D-1 Please explain how the Company chose a capacity of 180 MW / 720 MWh for the Project.

EFSB-D-2 Please state which of the equipment on site National Grid would own, if any.

EFSB-D-3 Refer to Exh. MS-A at 3. The Project drawings show a control building in the vicinity of the Project substation. Describe the proposed usage of the control building.

EFSB-D-4 Indicate the current level of site design development (30%, 60%, 90% etc.), and whether the Company has selected final equipment. If the Company has not selected final equipment, provide a timeline for the final equipment selection. What are the considerations that would guide final equipment selection?

EFSB-D-5 Refer to Exh. MS-A at 3. The Project site plan states 18 blocks for future augmentation but highlights 21 blocks. Please clarify this apparent discrepancy and state how many blocks the Company plans for future augmentation.

EFSB-D-6 Explain the rationale for situating the Project BESS units in the forested southeast corner of the site parcel as opposed to the portion of the site that was formerly a junkyard.

EFSB-D-7 Refer to Exh. MS-1 at 27. The Company states lithium-ion batteries have a useful life of approximately 10 years.

a. What is the anticipated overall Project life span?

b. Is the Project expected to maintain its 180 MW / 720 MWh capacity throughout its lifetime? Please explain.

c. Discuss the Company's plans to either replace individual battery cells, modules, or units or add new battery units to the Project, including the criteria that would be evaluated as part of this decision.

Construction Methods

EFSB-CM-1 What are the anticipated days and hours during which construction activities would occur?

EFSB-CM-2 Refer to Exh. MS-1 at 11. Has the Company had any preliminary conversation(s) with the Town regarding potential time restrictions on construction activities?

EFSB-CM-3 List any seasonal restrictions on construction activities relevant to this Project.

EFSB-CM-4 Describe the procedure the Company would follow to obtain permission to extend work beyond standard hours.

EFSB-CM-5 Please list major pieces of equipment the Company would use during Project construction and group the equipment by Project construction phase.

EFSB-CM-6 Describe the work that would occur for site preparation, including any construction activities that would have the potential to impact the bedrock, including blasting.

EFSB-CM-7 Refer to Exh. MS-1 at 47. Describe what the Construction Communication Outreach Plan would entail, including (a) when it would be developed, (b) the extent to which Town or public feedback would be solicited and incorporated into the plan, (c) the modes of communication to be used to distribute the plan and keep the parties up to date on plan implementation, and (d) how the Company would determine which stakeholders to inform of construction activities.

EFSB-CM-8 Describe the allocation of Project construction work responsibility between the Company and National Grid.

EFSB-CM-9 Refer to Exh. MS-1 at 24. Describe any measures the Company would undertake to minimize or mitigate impacts to the access road wetland crossing during construction.

EFSB-CM-10 Refer to Exh. MS-1 at 6-8. The Project Construction Envelope contains 7.2 acres of what appears to be mostly previously developed land outside of the Project Footprint. Please describe the construction activities the Company expects to conduct here, including the proposed locations of equipment and materials storage and staging and construction laydown areas.

EFSB-CM-11 Refer to Exh. MS-1 at 27. Does the Company anticipate that the Project construction would result in removal of topsoil from the Project Site? Address temporary soil storage and provide estimates of (1) area of land affected; (2) volume of soil removed; (3) volume of soil filled; and (4) volume of soil imported or exported.

EFSB-CM-12 Refer to Exh. MS-A at 3. The Project site plan includes space for the installation of future batteries. To what extent would site preparations for future battery installation, such as construction of equipment pads and installation of conduit, be conducted during the initial construction of the Project?

Safety

EFSB-S-1 Refer to Exh. MS-1, at 13. For each code and standard listed, explain its application to the Project and describe how the BESS would comply.

EFSB-S-2 Discuss the applicability of NFPA 68 and/or NFPA 69 to the Project.

EFSB-S-3 Refer to Exh. MS-F, Tesla Megapack 2: Fire Protection Engineering Analysis. The UL 9540A cell, module, and unit testing was conducted for the Tesla Megapack 2, a smaller unit than the Tesla Megapack 2XL proposed for this Project. Please provide an explanation of why the Megapack 2 testing results are applicable to the larger unit.

EFSB-S-4 Refer to Exh. MS-F at 17. The Fire Protection Engineering Analysis report states that during the module level testing the forced thermal runaway of two cells led to all cells in the module experiencing thermal runaway. In the unit level test, the forced thermal runaway of six cells led to only one additional cell entering thermal runaway. Please explain what design mechanisms in the unit level prevented the thermal runaway seen in the module level testing.

EFSB-S-5 Refer to Exh. MS-C at 6. Provide a copy of the reference materials listed. If the Tesla Megapack 2 documentation differs from that of the Tesla Megapack 2XL, provide the Tesla Megapack 2XL documentation. If there is not unique documentation for the Tesla Megapack 2XL, please explain why the Tesla Megapack 2 documentation applies to both models.

EFSB-S-6 Refer to Exh. MS-F at 8-11 regarding the management systems.

a. Describe the functions of and interactions among the Battery Management System ("BMS"), Thermal Management System ("TMS"), Tesla Site Controller ("TSC"), Tesla's Network Operations Center ("NOC"), and any other management system used for this Project.

b. Describe any service agreements or plans for such agreements between the Company and Tesla for the operation and maintenance of this Project.

EFSB-S-7 Refer to Exh. MS-F at 36. Destructive unit level testing resulted in a battery module burning for 6 hours and 40 minutes.

a. What components of the BESS are fuel sources?

b. How does the destructive unit level testing fire duration compare to the real-world instances of Tesla Megapack fires?

EFSB-S-8 Refer to Exh. MS-1 at 13. Specify the BESS hardware and management system safeguards that mitigate the likelihood and potential consequences of fire and thermal events.

EFSB-S-9 List all systems and other engineering features that are designed to prevent overcharging, overheating, internal shorts, or any other failure that could lead to a thermal emergency, spill, or other type of emergency event.

a. For each feature, describe its function and the potential failure(s) (and consequent emergency or emergencies) that the feature would be designed to prevent or manage.

b. For each feature, describe any risks of failure and the potential causes of such failure during both normal operations and emergencies. Describe any physical redundancies or response protocols that would address such risks or causes.

EFSB-S-10 Describe how thermal runaway risk changes based on the battery's state of charge, health, age, and spacing between units. How does the Project design minimize risk for each of these variables?

EFSB-S-11 Provide a summary of the best practices the Company would employ or rely upon for the following components or elements, particularly with regard to fire safety and prevention of environmental contaminations:

a. Factory acceptance testing for all BESS components

b. Pre-shipment inspection for all BESS components

c. Inline production monitoring for BESS projects

d. Operations monitoring over the life of BESS projects

e. Decommissioning

EFSB-S-12 How would the Company implement quality control in detecting and addressing:

a. System-level issues: (1) balance of system and performance test problems (caused by manufacturing defects and improper system integration); and (2) enclosure problems (caused by potential defects from the enclosure manufacturing process and mishandling during transportation). This explanation should focus on:

   1. Fire suppression system defects, including non-responding release actuator for the fire extinguishing agent, non-functioning fire alarm abort button, non-responding smoke and temperature sensors, other potential defects.
   2. Thermal management system defects, including circulation system components failure, compressor mainboard short circuiting, other potential defects.
   3. Defects in other system types.

b. Manufacturing defects in battery cells and modules.

c. Integration, assembly, and construction issues: (1) Inadequate workforce training and quality checks during energy storage commissioning and integration; and (2) Issues connecting to transmission lines and the power grid.

d. Operation issues: (1) Gaps in battery monitoring and predictive analyses to identify potential failures early; (2) improper operation; (3) improper maintenance.

EFSB-S-13 Has the Company assessed the risks potential Project emergencies pose to the surrounding population and environment? If so, provide all associated documentation. If not, how does the Company plan to comprehensively assess Project risks to the surrounding population and environment?

EFSB-S-14 Provide a record of Tesla Megapack fire incidents during the past five years, including project locations, size, cause of the fire, duration of the fire, number of battery units involved in the fire, and any post-fire cleanup or contamination testing, to the extent that this information is publicly accessible.

EFSB-S-15 Has the Company analyzed data on post-emergency BESS conditions in other projects regarding environmental, safety, health impacts; management/disposal of damaged or contaminated materials; site cleanup; site repurposing; regulatory action; or any other variables to inform the Project design or plans? If so, describe the data, and how the Company has applied lessons from the data to the Project. If not, why?

EFSB-S-16 Refer to Exh. MS-1 at 14 regarding the Emergency Response Plan ("ERP").

a. What is the status and expected timing of this plan's development?

b. List any third parties, including Town personnel or third-party contractors, who would contribute to the development of this plan.

c. Describe what information would be included in this plan.

EFSB-S-17 Provide an overview of the expected response procedure to a fire emergency on site. Include details regarding the alarm system, communication hierarchy, command structure, expected response times, and post incident monitoring.

EFSB-S-18 Refer to Exh. MS-1 at 14.

a. What is the Company's proposed roles for the Town's Fire Department and other first responder agencies in responding to a BESS fire?

b. Who at the Company would be responsible for coordinating with the Fire Department during an emergency event?

c. How would the Fire Department learn of a fire at the site?

EFSB-S-19 For Project emergencies including a BESS fire, describe the anticipated degree of reliance on first responders outside of Oakham, such as those with mutual aid agreement with the Oakham Fire Department. List all potentially involved first responders.

EFSB-S-20 The following questions address firefighting water and suppressing agents in case of a BESS fire.

a. Discuss whether water or other fire suppressing chemicals would be used to control a BESS fire and, if so, specify whether the firefighting water or suppressing agents would be used for dousing and putting out a fire, cooling adjacent battery units to prevent them from catching fire, or other purposes.

b. If water or fire suppressants would be used to respond to a fire emergency, provide the quantity (both absolute volume and continuous flow rate) that would be needed. Please clearly state any assumptions made in calculating these amounts.

c. If water or fire suppressants would be used to respond to a fire emergency, provide the availability and source, including any on-site storage, of the firefighting water and suppressing agents.

d. Are the amounts of firefighting water available on the Project Site adequate to meet the needs identified in part c. above? If not, what sources of water could the Company develop/provide to address this need?

e. If water or fire suppressants would be used to respond to a fire emergency, describe measures (e.g., design features, operational features, contingency measures) to contain the runoff of the firefighting water or chemical agent and prevent them from going off-site and into nearby waterways or groundwater, including the Quabbin Reservoir.

f. If water or other fire suppressing chemicals should not be used in certain aspects of responding to a BESS fire, describe those scenarios.

EFSB-S-21 Refer to Exh. MS-1 at 14, which states that the Company would provide training for Oakham firefighters.

a. Explain how training would ensure that first responders are adequately familiar with the spectrum of materials, conditions, and protocols associated with the scope of potential emergencies at the Project, and could effectively and safely respond? The response should include, but not be limited to: (a) a summary of the frequency and nature of trainings, including response drills; and (b) a list of all parties that would participate in the training (including local and neighboring fire departments and Company agents).

b. Additionally, identify any additional first responder units who would be tasked with addressing emergency events beyond those involved in the training.

c. Would the Company provide any specialized equipment for the Oakham firefighters and other first responders, for training and ensuring they are capable of responding to a BESS fire?

EFSB-S-22 Describe how the Company would control vegetation that may grow in the vicinity of the Project.

a. Could a thermal emergency at the Project ignite surrounding vegetation, structures, or other landscape features? If so, describe the potential scenario(s), list any proposed mitigation that the Company may implement to minimize the risk of such scenario(s), and summarize the emergency response protocols in case such scenario(s) occur.

EFSB-S-23 Recent BESS fires including those in Moss Landing, California and Parkfield, California have triggered evacuation orders. Has the Company evaluated whether an evacuation or shelter in place order may be necessary in the event of a BESS fire? Please describe any discussion the Company has had with the Town about the possibility of an evacuation plan.

EFSB-S-24 In the event of a thermal incident, describe (a) how the Company would safely shut down the Project, (b) how the Company would determine when the emergency event has concluded, (c) how the Company would safely remove damaged equipment from the site and transport it to a secure location, and (d) how the company would safely re-energize the Project post-incident.

EFSB-S-25 During a BESS fire or thermal runaway event, what real-time conditions would first responders need to monitor (e.g., wind direction, fire temperature, airborne levels of hazardous substances) to perform their duties safely and effectively?

a. Describe how such monitoring would occur.

EFSB-S-26 What parties would be responsible for responding to negative health, safety, and environmental impacts (caused by an emergency at the Project) beyond the Project site?

a. Would first responder training address response to such impacts?

EFSB-S-27 Would the Company share any post-incident reports with the Town of Oakham? If yes, describe what that report would entail.

EFSB-S-28 List any gases that could be released during a thermal emergency that could reach levels immediately dangerous to life and health.

a. Identify any systems within the BESS unit to detect the release of toxic chemicals.

16. The following questions address potential health, safety, and environmental impacts of airborne toxins released by fires at the Project.

b. How would the Company address potential impacts of airborne toxins released by fires at the Project?

c. Could airborne toxins released by fires at the Project potentially affect the Ware River Watershed and, subsequently, the MWRA water supply system at the Quabbin Reservoir? Explain.

EFSB-S-29 Describe the potential for release of hydrogen fluoride (HF) in the event of fire or thermal runaway involving the Project's batteries or any of its components.

a. Would the use of water or other firefighting agents under such circumstances increase the production of HF?

EFSB-S-30 Describe any air or water sampling or testing that the Company or other parties would conduct during emergency conditions. Be sure to address the following in your response:

- How would the Company sample the air for hazardous materials during a thermal runaway event?
  - What constituents would the Company sample?
  - How would the Company incorporate such sampling into first response plans and protocols?
- If first responders use water to suppress fire or cool adjacent units, how would the Company sample firewater to determine contamination levels?
  - What constituents would the Company sample for?
  - How would the Company incorporate such sampling into first response plans and protocols?

EFSB-S-31 The following questions address emergency access to the Project site.

a. Has the Company reviewed plans or protocols for emergency site access for first responders with the fire department and other first responders? If so, describe the outcome of the review and list any associated recommendations or action items. If not, when would the review occur?

b. Describe the local road system's suitability for emergency vehicle at any time.

EFSB-S-32 Refer to MS-1, at 30. Please explain how the Company would remotely monitor conditions of the facility.

a. Who would be responsible for monitoring site conditions?

b. Would this work be contracted to a third party?

c. Describe the outputs the Company would monitor (e.g., sensor data, alarms, video surveillance, etc.).

d. What types of failures would remote monitoring detect, and how would such detection occur?

e. Could there be any types of potential emergencies at the Project – thermal, spill, or other – that cannot be detected by an operation control center or other forms of emergency detection? If so, explain.

f. What actions may be undertaken remotely to address any site faults?

g. What contingencies would be in place to address any breakdowns or interruptions in monitoring?

h. By what means (e.g., phone line, Wi-Fi, etc.) would the systems on site transmit data to remote monitoring stations?

EFSB-S-33 Refer to Exh. MS-1 at 9, regarding the facility's multiple locked security access gates. Please specify which, if any, emergency responders within Oakham would have access to these gates.

EFSB-S-34 The following questions address security for the Project, e.g., restrictions to access to the site.

a. Summarize the Project's physical security features and security protocols.

b. What are the standards, provisions, and certifications that would guide the Company's approach to cybersecurity?

c. How would the Company ensure that its cybersecurity safety features remain current?

EFSB-S-35 Provide an explanation of all safety-related communications features on the Project site, including any signage, alarms, or display panels, that could alert emergency personnel to equipment experiencing fault conditions.

Wetlands and Water Resources

EFSB-W-1 Refer to the public comment hearing transcript at 37-38. Since the Application was initially filed, comments indicate that there are three newly certified vernal pools on the Project parcel. Provide an updated map or maps that delineate these vernal pools, wetlands boundaries, buffer zones, and watershed boundaries overlaid with the site plan. If the Company is not able to provide these maps, please explain why.

EFSB-W-2 Please list any local, state, and federal regulations that apply to vernal pools and describe their applicability to the Project.

EFSB-W-3 Describe how NHESP certifies a vernal pool, the legal effect of that certification, and the susceptibility of that certification to revision. Include the specific parameters that resulted in the certification of the three vernal pools on the Project parcel.

a. List any obligate or facultative species found within these vernal pools that contributed to the NHESP certification and identify whether any are protected species.

b. Discuss the impacts to wildlife species of removing a vernal pool upon which the wildlife relies.

EFSB-W-4 The following questions address potential implications of the vernal pool certification on the Project design.

a. Discuss the potential implications, regulatory or otherwise, of the two certified vernal pools near the Project footprint on the Project's civil and electrical design.

b. Discuss the potential implications, regulatory or otherwise, of the two certified vernal pools near the Project footprint on stormwater management design.

c. Describe any past, present, and planned engagement with NHESP, particularly in the context of the vernal pool certification, including any NHESP permits and approvals required for the Project.

EFSB-W-5 Please describe efforts the Company would undertake to avoid, minimize, or mitigate impacts on certified vernal pools. If the Company contends that the legal status of the certified vernal pools would change, include as part of your answer what the Company would do if the legal status does not change.

EFSB-W-6 Refer to Exh. MS-B at 3. Please explain why the Company was not able to choose an access road pathway to the rear of the site that avoids the bordering vegetated wetland areas.

EFSB-W-7 Did the Company consider alternate site plans that moved equipment out of the 100-foot wetlands buffer zone in the southeast parcel corner? Explain why or why not.

EFSB-W-8 Refer to Exh. MS-B at 4. Further describe the expected timing for the production of the construction period pollution prevention plans and erosion and sedimentation plans, long-term pollution prevention plans, and the identification of post-construction drainage system owners and parties responsible for operation and maintenance.

EFSB-W-9 Refer to Exh. MS-B at 5-7 regarding the stormwater management design points.

a. Please explain what a design point is as it relates to stormwater management and explain how a design point is determined.

b. The Stormwater Management Report states that sub-catchment E1 drains to Design Point 1 ("DP-1") within the Ware River sub-watershed. The existing sub-catchment map in Appendix D of the report (Exh. MS-B at 37) shows DP-1 as being to the west of the parcel boundary and outside of the area shown as a surface water supply watershed in the Surface Water Supply map in Appendix B (Exh. MS-B at 29). Please clarify (1) which watershed(s) sub-catchment E1 is a part of, (2) which watershed DP-1 drains to, and (3) provide pre- and post-development sub-catchment maps with these watersheds clearly delineated.

c. Is the Quaboag River sub-watershed hydrologically connected to the MWRA water supply system at the Quabbin Reservoir? If so, how?

EFSB-W-10 Refer to Exh. MS-B at 6. Explain how high groundwater conditions may impact the design and function of the dry detention basins.

EFSB-W-11 Refer to Exh. MS-B at 7. Describe the stormwater flow on site if rainfall exceeds the 25-year design storm.

EFSB-W-12 Refer to Exh. MS-B at 8. Would the Company conduct any post-storm monitoring of the stormwater to ensure that the discharge to the Quaboag sub-watershed meets the 30% total phosphorous removal requirement and the 80% of annual post-development Total Suspended Solids removal requirement?

EFSB-W-13 Refer to Exh. MS-B at 8. Describe the sedimentation and erosion control measures that the Company would use to ensure no water runoff from the access road into the Zone C Surface Water Supply Protection Area.

EFSB-W-14 State the minimum distance between electrical equipment as proposed and the Ware River Watershed boundary on the Project parcel.

EFSB-W-15 The following questions address dewatering.

a. Do any construction activities require dewatering?

b. How does the Company know that the area does or does not require dewatering?

c. Describe how the Company would dispose of the removed water, including any mitigation measures to avoid and minimize contamination of soil and water.

EFSB-W-16 Refer to the public hearing transcript at 37-38. The Oakham Conservation Commission indicated during the public comment hearing that the Company omitted wetland resources, including a seasonal ponding area and an intermittent stream, from its delineation of the Project site. Please adjust the delineation, if necessary, and otherwise provide supporting evidence for the Company's determination that these features are not wetlands resources.

Noise

EFSB-NO-1 Refer to Exh. MS-C at 5. Epsilon's report modeled the noise output of 212 battery units. The Company's proposed design includes up to 296 battery units.

a. What is the maximum number of battery units expected to operate concurrently during the life of the Project?

b. What is the maximum potential number of medium voltage transformers expected to operate concurrently during the life of the Project?

c. Refer to Table 6-3 and Table 6-4. What is the modeled sound level and sound level increase above background sound level at each receptor ID included in the modeling report for the maximum potential amount of equipment operating at the same time?

EFSB-NO-2 Refer to Exh. MS-C at 28 regarding the throttling of Tesla Megapack 2XL fan speeds.

a. Please describe the function and purpose of the Tesla Megapack 2XL fans.

b. Provide the written communications with Tesla confirming the units can operate safely at 40% of the nominal fan speed.

c. How was the 40% of nominal speed rate determined to be appropriate?

d. What thermal characteristic assumptions were used to determine the BESS could operate safely with fans throttled to 40% of their nominal speed?

e. How do the thermal characteristics in (d) compare to historic temperatures and humidity records for Oakham and to the climate change projections for the life of the Project?

f. How is fan speed of the battery unit controlled?

g. Can the fan speed be factory limited to 40% of nominal?

EFSB-NO-3 Refer to Exh. MS-C at 28. How did the Company determine the appropriate height of the sound wall?

EFSB-NO-4 Refer to the discussion of MassDEP Noise policy at Exh. MS-C at 10 and Table 6-3 at Exh. MS-C at 25. The projected sound level increase above ambient exceeds 10 dBA at PL North, PL East, and PL South. Could MassDEP determine that the Project needs to mitigate noise at the property lines to comply with the MassDEP Noise Policy? Why or why not?

EFSB-NO-5 List the noise levels and durations expected for site work and construction activities occurring on site.

a. What are the noisiest activities during construction, and what are the sound levels of the major noise-generating pieces of equipment?

b. What, if any, sound mitigation measures would the Company use during construction?

EFSB-NO-6 Describe whether the sound modeling reflected the planned removal of trees. To the extent the modelling did not recognize the planned tree removal, describe the impact the removal would have on the sound modeling results.

EFSB-NO-7 Discuss any wildlife species within the Project vicinity that may be adversely affected by the noise generated by the Project.

EFSB-NO-8 Does the Company plan to conduct any noise measurements during operation to confirm the results of the preconstruction modeling?

Land Use

EFSB-LU-1 Refer to Exh. MS-1 at 2. Describe the site's former use as an auto salvage and recycling facility, including how many years it was in operation and how many years it has been inactive.

EFSB-LU-2 Refer to Exh. MS-1 at 6. The Company stated that it intends to use roughly 18-acres of the 42.9 acre Project site for the Project. Does the Company or anyone else have any plans to develop and/or clean up the remainder of the parcel?

EFSB-LU-3 Refer to the site plans in Exh. MS-1 at 7-8.

17. How many acres of forested land would Project construction impact and approximately how many trees would it remove?

a. Characterize the type of forest the construction would impact, including the relative age of the trees to be removed.

b. What plans does the Company have, if any, to mitigate or offset the tree removals associated with the Project? If none, why not?

Hazardous Waste

EFSB-H-1 Refer to Exh. MS-1 at 2. Describe the plans for the removal of abandoned cars from the site.

EFSB-H-2 Refer to Exh. MS-1 at 14. When would the Company develop the Hazardous Materials Assessment?

EFSB-H-3 Refer to Exh. MS-1 at 26 regarding the existing solid waste on site. Has the Company or anyone else assessed contamination on site from prior use as an auto salvage junkyard? If so, please describe such assessment(s).

EFSB-H-4 Refer to Exh. MS-1 at 26-27. Describe the consultation the Company would have with a Licensed Site Professional regarding contaminated soil, groundwater, or media. At what stage(s) of the Project would the Company test the site for contamination? What specifically would the Company test for? At what location(s) on site would this testing occur?

EFSB-H-5 Refer to Exh. MS-1 at 27. Does the Company intend to recycle batteries or battery components at the end of their useful life? If so, how? If not, what plans does the Company have for the batteries?

Visual

EFSB-V-1 Refer to MS-1, at 28.

a. Provide the local lighting standards that apply to the Project.

18. Describe the security lighting that the Company would use on site, including in particular its effect on the night sky and nearby neighbors.

Air

EFSB-A-1 Would the Project use any equipment that contains sulfur hexafluoride ("SF_6")? If yes, how much total SF_6 would be on the Project site at any one time?

EFSB-A-2 Describe the extent to which this Project reduces the need for non-renewable energy generation and contributes to a reduction in greenhouse gas emissions. Provide any quantitative analysis performed to support this response.

Traffic

EFSB-T-1 Refer to MS-1 at 30. For each phase of Project construction – describe the daily flow of:

a. Construction personnel to and from the Project construction site(s), including average numbers of workers entering and exiting the site(s) and corresponding entrance and exit times.

b. Construction equipment to and from the Project construction sites(s), including average numbers and times of truck trips.

c. BESS component deliveries to the Project construction site(s), including numbers and times of truck trips.

d. Numbers and times of any oversize loads that would be delivered to the Project construction site(s).

EFSB-T-2 Refer to MS-1 at 30. Describe the number of traffic trips the Project would generate during regular operations post-construction completion.

EFSB-T-3 Refer to MS-1 at 30. Discuss potential remote locations for parking areas and/or contractor staging/laydown areas during Project construction. Provide potential localities if the Company cannot provide exact locations at the moment.

EFSB-T-4 The following questions address vehicle and delivery path(s) to the Project site.

a. State the typical roadway path or paths that construction and delivery vehicles would take to the Project site.

b. Characterize the roadways that the Company would use to transport vehicles and equipment to the Project site, including road width and estimated daily traffic.

c. Ascertain whether roadway turning clearances along the path would be sufficient for all expected vehicles and deliveries, and, if insufficient, describe corresponding mitigation measures.

EFSB-T-5 Address traffic impacts from Project construction on any school bus routes, on student drop-off/pick-up at the Oakham Center School, and on traffic from municipal facilities nearby, such as the Fire Department, Town Hall, and Fobes Memorial Library.

EFSB-T-6 Describe any plans for snow and ice removal along the site access road.