

GEORGE W. WATSON III

One Financial Plaza, 14th Floor
Providence, RI 02903-2485
Main (401) 709-3300
Fax (401) 709-3399
gwatson@rc.com
Direct (401) 709-3351

Also admitted in Massachusetts,
Connecticut and Vermont

Via Hand Delivery and Electronic Mail

March 8, 2022

Emma Rodvien, Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

**Re: Docket No. SB-2021-04 - The Narragansett Electric Company d/b/a National Grid
Application for a License to Mobilize and Operate a Liquefied Natural Gas (LNG)
Vaporization Facility at Old Mill Lane (Portsmouth, RI)
Response to the Town of Middletown's Formal Objection**

Dear Ms. Rodvien:

I am enclosing for filing on behalf of The Narragansett Electric Company ("TNEC") an original and seven (7) copies of TNEC's Response to the Town of Middletown's Formal Objection to TNEC's Monthly Progress Reports.

Sincerely,



George W. Watson, III

Enclosure

Copy to: Docket SB-2021-04 Service List (by electronic mail)

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RE: EFSB SB-2021-04 – The Narragansett Electric Company’s Response to Town of Middletown’s Formal Objection to the Monthly Progress Reports

Dear Ms. Rodvien:

I write in response to the Town of Middletown’s Formal Objection to The Narragansett Electric Company’s (the “Company”) Monthly Progress Reports, which alleges deficiencies in status reports, some that were filed as long as five months ago¹, that were required by the Energy Facility Siting Board’s (“EFSB”) Order No. 150. The Company is cognizant of the information and supporting documentation that the Supplemental Application must include and is finalizing the required project engineering in order to submit a complete Supplemental Application on or before April 4, 2022.

The Company has either completed or is in the process of completing the greenhouse gas emission impact analysis, non-infrastructure alternative analysis, more detailed description of gas demand forecasts, and property purchase plan. In accordance with Order No. 150, this additional information will be included in the Company’s Supplemental Application to the EFSB. The monthly reports have focused on the status of the engineering for the site as completion of that

¹ The Rhode Island Energy Facility Siting Board Rules of Practice and Procedure do not provide a time limit for objecting to the monthly reports. The nearest applicable appears to be Rule 1.17 which provides “Objections - Any party objecting to a written motion filed pursuant to this rule shall within five (5) days of the service of the motion, file an objection thereto in writing setting forth in detail the grounds for the objection. The time for filing objections may be varied by order of the Board.” The Town of Middletown’s Formal Objection was submitted 16 days after the latest monthly report which was dated and filed on February 15, 2021.

Emma Rodvien, Coordinator
Energy Facility Siting Board
March 8, 2022
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task is essential to the Supplemental Application. The first condition of Order No. 150 is as follows:

(a) That the Company is required to file by no later than April 4, 2022 a supplemental application in this Docket which sets forth the final proposed solution. The filing should include: (a) all the information required in the same form as if the supplemental application was a stand-alone application, (b) the estimated costs of each of the alternatives to the long-term solution that the Company rejected, (c) for each of those alternatives, the filing also should describe the Company's basis for rejection and how the Company evaluated each of the rejected solutions against its forecast(s) for design day demand, and (d) a comparison of the greenhouse gas emissions impact of each alternative;

Order No. 150, Page 35. In short, although it is referred to as a Supplemental Application, the Company is essentially preparing a new stand-alone application for a newly engineered long-term solution for the Old Mill Lane site to support the local natural gas distribution system. This includes completing the natural and social environment impact analysis and engineering mitigation for the new site design. As noted above, the efforts to complete the Supplemental Application, including the additional information required by Order No. 150, are in progress and will be completed on schedule.

Sincerely,



George W. Watson III

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