



DESAUTEL LAW

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March 3, 2022

VIA USPS AND E-MAIL

Emma Rodvien, Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888
Emma.Rodvien@puc.ri.gov

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)

Dear Ms. Rodvien:

Enclosed herewith for filing please find the Town of Middletown's Formal Objection to the Narragansett Electric Company's Monthly Progress Reports as required by Order No. 150 of the Energy Facility Siting Board regarding the Portable LNG Vaporization Project at Old Mill Lane. The original and seven (7) copies have been sent this day via USPS.

Thank you for your attention to this matter.

Sincerely,

Marisa Desautel, Esq.
Enclosures

Cc: Service List



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**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)**

Dear Ms. Rodvien:

This letter is submitted on behalf of the Town of Middletown, by its counsel, Marisa Desautel, Esq., as a formal objection to the Narragansett Electric Company's Monthly Progress Reports as required by Order No. 150 of the Energy Facility Siting Board ("EFSB"), regarding the Portable LNG Vaporization Project at Old Mill Lane.

In response to the EFSB's Order No. 150 dated September 17, 2021, the Narragansett Electric Company (the "Company") is required to file monthly reports describing the progress and status of the Company's efforts to prepare the material needed to file a supplemental application in Docket No. SB-2021-04. This memorandum briefly reviews the six reports received to date and formally objects to the Company's lack of progress in meeting the requirements of Order No. 150.

In Order No. 150, the EFSB required the Company to include the following information in its supplemental application due on April 4, 2022.

- Estimated costs of rejected alternative solutions, the basis for rejecting each alternative, and a comparison of the greenhouse gas emissions impact of each alternatives;

- A comprehensive evaluation and analysis that explains what would be necessary to address the long-term capacity constraint issue with non-infrastructure initiatives, including energy efficiency, demand response, and electrification conversions. The evaluation and analysis should address two scenarios: one of which assumes no moratorium on new gas connections and one which assumes a full moratorium of new gas connections beginning in 2023;
- A full explanation of the Company's forecasting methodology, including the gas demand forecasts that would be required when an application is initially filed in the ordinary course of a proceeding;
- An evaluation and potential implementation plan to purchase the premises of neighbors in close proximity of the Old Mill Lane station;
- Monthly reporting of progress on these and other requirements of the Order.

The monthly reports provided by the Company have been brief, one-page documents with the exception of the first report on October 1, which was not quite one-and-a-half pages. The initial report described the Company's identification of the Old Mill Lane site as its preferred long-term solution. Subsequent reports have largely focused on the Company's efforts to redesign the Old Mill Lane facility to address complaints regarding noise and visual impact. The table below summarizes the extent to which each progress report addresses the key requirements imposed by the EFSB. A "Y" indicates that the report mentioned continued work on the issue, although not necessarily any details. An "N" indicates no mention.

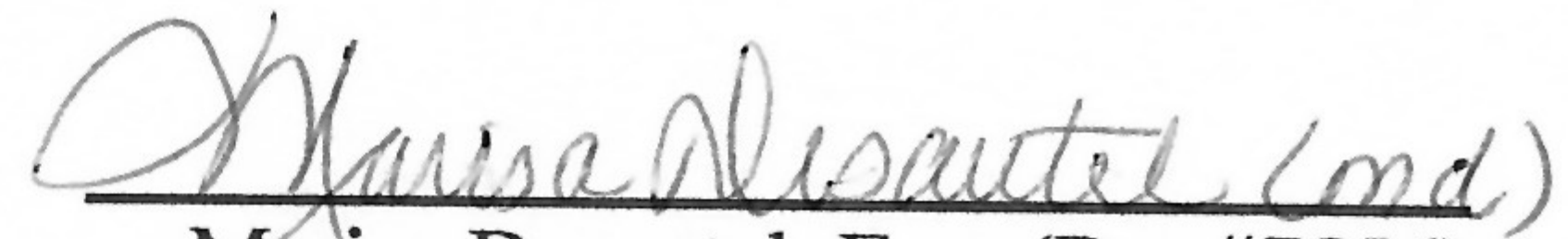
Table 1: Summary of Monthly Report Content Related to Order No. 50 Requirements

Requirement	Oct 1	Oct 15	Nov 15	Dec 15	Jan 14	Feb 15
GHG comparison	Y	Y	Y	Y	N	N
Non-infrastructure initiatives evaluation	N*	N	N	N	N	N
Forecasting detail	N	N	N	N	N	N
Plan to purchase property	N	N	Y	N	N	N

*The report notes that the Company has "progressed its analysis of the preferred long-term solution and has identified the seasonal and temporary operation of LNG at Old Mill Lane as a recommended solution..." but makes no further reference to the scenario analysis required in Order No. 50.

To date, the Company has provided little to no indication that it has proceeded to develop the detailed analysis of non-infrastructure initiatives required by the EFSB, nor is there an indication that the forecasting detail needed to support that analysis (which includes the scenarios both with and without a moratorium) will be forthcoming. As these are very important requirements from the Town's perspective, the Town respectfully requests that the EFSB consider these issues and take appropriate action to ensure compliance with Order No. 150.

Respectfully submitted,
Town of Middletown
By its Attorney

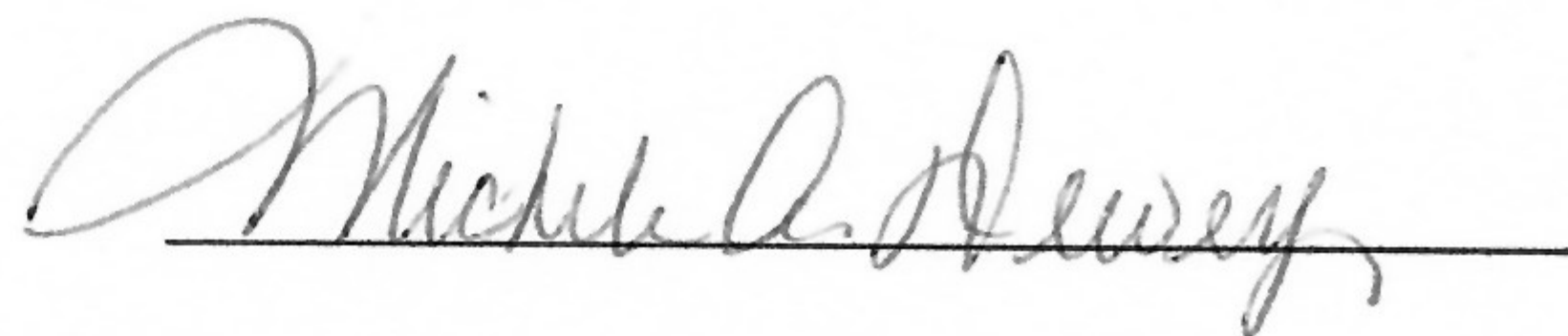


Marisa Desautel, Esq. (Bar #7556)

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CERTIFICATION

I, the undersigned, hereby certify that I filed an original of the within Objection with the Rhode Island Energy Facility Siting Board, and sent a true copy via electronic mail, of the within Objection to the parties listed on the Service List for Docket No. SB-2021-04, on this 3rd day of March, 2022.



SB-2021-04 The Narragansett Electric Company d/b/a National Grid Application for License to Mobilize and Operate a Liquefied Natural Gas (LNG) Vaporization Facility at Old Mill Lane (Portsmouth, RI)

Updated January 7, 2022

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