# STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :

(V148S 115kV Transmission Line : Docket No. SB-

Asset Condition Refurbishment Project : Cumberland and Lincoln, Rhode Island) :

Notice of Intent Application of The Narragansett Electric Company

### Counsel:

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#### INTRODUCTION

The Narragansett Electric Company ("TNEC"), with a principal place of business at 280 Melrose Street, Providence, Rhode Island 02907, hereby submits this Notice of Intent Application to the Energy Facility Siting Board (the "Board" or "EFSB") for approval of the refurbishment of an existing transmission line within the State of Rhode Island, pursuant to the applicable provisions of Rhode Island General Laws §§ 42-98-1, et seq. and the Board's Rules of Practice and Procedure, as amended (the "EFSB Rules").

This Application is filed by TNEC pursuant to Rule 1.6(F) of the EFSB Rules which provides an abbreviated review for (i) the construction of power lines of more than 1,000 feet but less than 6,000 feet or (ii) the modification or relocation of power lines. As noted in Rule 1.3(A)(4), "'modification' includes reconductoring and rebuilding an existing power line." Rule 1.6(F) provides for an abbreviated application, a public hearing "in one or more of the cities or towns affected by [the] application," and a determination within sixty (60) days of the filing as to "whether the project may result in a significant impact on the environment or the public health, safety and welfare," thereby requiring a full EFSB review. (See EFSB Rules 1.6(F), (G), and (H)). If the Board does not find that the project may result in a significant impact on the environment or the public health, safety and welfare, the project does not constitute an "alteration" and the project may proceed without further review. (See EFSB Rules 1.2(D) and 1.6(F)).

TNEC is proposing to refurbish the existing V148S 115 kV transmission line which is approximately 4.8 miles in length ("V148S Line" or "Line") from Washington #126 Substation in Lincoln, Rhode Island to the Massachusetts state line (the "Project"). The Project is referred to as a "refurbishment" because the need is driven by the asset conditions as opposed to the line

being rebuilt to respond to anticipated load growth. The Project is jurisdictional because the "normal carrying capacity of the line" is increasing, but this increase is because the over 60-year-old transmission line is being built to meet current electric safety code and industry standards. The Project will occur within the existing V148S Line right-of-way ("ROW") that is located in the towns of Lincoln and Cumberland. The proposed Project will include adding one (1) new switch structure, replacing fifty-eight (58) existing structures and removing one (1) existing structure. All replacement structures will be steel davit arm types except for four (4) structures that will be replaced with steel H frame structures.

In this Application, TNEC requests the Board's approval of the Project. TNEC is filing herewith and incorporates herein a Siting Report entitled "V148S Transmission Line Asset Condition Refurbishment Project" (the "Siting Report"). This application follows the organization of Rule 1.6(F) and identifies the sections of the Siting Report where the issues identified in the EFSB Rules are discussed.

- 1. Identification of the owner(s) of the facility.<sup>1</sup>
  - a. The owner of the facility is The Narragansett Electric Company, a Rhode Island chartered public utility, with its principal place of business at:

280 Melrose Street Providence, RI 02907

b. The affiliates of The Narragansett Electric Company include its parent,
National Grid USA and the National Grid (US) Holdings Ltd companies. The corporate
relationships among the National Grid (US) Holdings Ltd companies are shown on

<u>Exhibit A</u>, attached. A listing of non-US affiliates is available upon request.

<sup>&</sup>lt;sup>1</sup> EFSB Rule 1.6(F)(1) requires the applicant to provide identification of the owner(s) of the facility, including identification of all affiliates of the proposed owners, as such term is defined in R.I.G.L. §39-3-27.

### 2. <u>Detailed description of the proposed facility</u>.<sup>2</sup>

The V148S Line is a 4.8-mile 115 kV transmission line that passes through the towns of Lincoln and Cumberland, Rhode Island. The purpose of the Project is to address wood pole deterioration that has occurred due to weathering, storm damage, and woodpecker damage. Additionally, the existing circuits need to be reconductored and new fiber optic ground wire needs to be installed to provide high-speed communications between substations. The Project activities also include structure replacements, overhead maintenance, grading to provide adequate workspace for Project activities for future maintenance, and reestablishing pre-existing access roads where required to safely access the structures.

The Project is described in more detail in Section 3.0 of the Siting Report.

## 3. <u>Detailed description and analysis of the impact of the Project on the physical and social environment.</u><sup>3</sup>

The environmental characteristics of the Project area are described in Section 5.0 of the Siting Report and the affected social environment is discussed in Section 6.0. The impact of the Project on the natural and social environments is described in Section 7.0 of the Siting Report. A review of current health research pertaining to electric and magnetic fields is included as Appendix A of the Siting Report. The existing and projected levels of electric and magnetic fields at the edges of the ROW are provided in §§7.15.1, 7.15.2 and 7.15.3 of the Siting Report.

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<sup>&</sup>lt;sup>2</sup> EFSB Rule 1.6(F)(2) requires the applicant to provide a detailed description of the proposed facility, including its length, route, function and operating characteristics, and complete plans as to all structures associated with the proposed facilities.

<sup>&</sup>lt;sup>3</sup> EFSB Rule 1.6(F)(3) requires the applicant to provide a "[d]etailed description and analysis of the impact of the Project on the physical and social environment. The applicant shall also provide a review of the current independent scientific research pertaining to electromagnetic fields ("EMF") and shall provide data on the anticipated levels of EMF exposure and potential health risks associated with this exposure. To the extent the proposed Project will have only negligible impact on any particular resource in the natural and social the applicant may so state and need not provide a detailed analysis of the baseline conditions for that resource."

- 4. <u>All studies and forecasts which demonstrate the need for the proposed facility.</u><sup>4</sup>
  The need for the Project is described in Section 2 of the Siting Report.
- 5. The reasons why the Project does not constitute the alteration of a major energy facility.

Transmission lines of 69 kV and above are included in the definition of "major energy facility" in Rule 1.3(A)(16) of the EFSB Rules. However, Rule 1.3(A)(4) states that

the modification<sup>5</sup> or relocation of an existing power line shall not be an alteration <u>unless</u> the Board determines that the project may result in a significant impact on the environment or the public health, safety and welfare. [Emphasis added.]

Thus, the Project would constitute the alteration of a major energy facility and be subject to the full EFSB permitting process only if the Board determines that it "may result in a significant impact on the environment or the public health, safety and welfare."

As explained in Section 3 of the Siting Report, the Project involves refurbishing the existing V148S Line between the Washington #126 Substation in Lincoln, Rhode Island, and the Massachusetts state line.

The impacts of the Project are discussed in Section 7.0 of the Siting Report and summarized in Sections 7.1 and 7.2. The mitigation measures are discussed in Section 8.0 of the Siting Report. In summary, any impact to environmental resources and the social environment will be negligible. Consequently, because the Project does not significantly impact the environment or the public health, safety and welfare, the Board should determine that the Project does not constitute an alteration and is not subject to the full EFSB permitting process.

<sup>&</sup>lt;sup>4</sup> EFSB Rule 1.6(F)(4) requires the applicant to provide all studies and forecasts which demonstrate the need for the proposed facility under the statewide master construction plan submitted annually.

<sup>&</sup>lt;sup>5</sup> Per EFSB Rule 1.3(A)(4), modification "includes reconductoring and rebuilding an existing power line."

#### **CONCLUSION**

This Application and the Siting Report, which is filed herewith and incorporated herein, and the other supporting material clearly demonstrate that the proposal to refurbish the existing V148S 115 kV Transmission Line will not result in a significant impact on the environment or the public health, safety and welfare.

For the reasons stated herein, The Narragansett Electric Company requests that the Energy Facility Siting Board approve the Project as described herein pursuant to EFSB Rule 1.6(F).

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY

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## The Narragansett Electric Company – Structure Chart

