

Via Electronic Mail and Hand Delivery

July 11, 2022

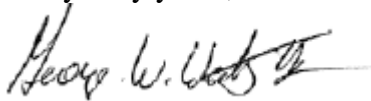
Emma Rodvien, Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Re: **SB-2021-04 – Petition for Second Waiver Extension
The Narragansett Electric Company
Aquidneck Island Gas Reliability Project
Old Mill Lane, Portsmouth, RI**

Dear Ms. Rodvien:

I am enclosing for filing on behalf of The Narragansett Electric Company an original and seven (7) copies of its Petition for Second Waiver Extension to allow for the seasonal mobilization of LNG equipment while the Energy Facility Siting Board application for the Aquidneck Island Gas Reliability Project is being processed.

Very truly yours,



George W. Watson III

Enclosures

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

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 October 1, 2021

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :
(Aquidneck Island Gas Reliability Project : Docket No. SB-2021-04
Old Mill Lane, Portsmouth, RI) :

Petition of The Narragansett Electric Company for Second Waiver Extension

Counsel:

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(401) 709-3300

July 11, 2022

INTRODUCTION

The Narragansett Electric Company (the “Company”) hereby petitions the Rhode Island Energy Facility Siting Board (“EFSB” or “Board”) to extend the waiver from the licensing requirement of the Energy Facility Siting Act (“Act”) previously granted by the Board on January 8, 2020, as extended by EFSB Order No. 150 dated August 26, 2021, for the seasonal operation of a portable liquefied natural gas (“LNG”) vaporization facility at Old Mill Lane, Portsmouth, Rhode Island (the “Property”) to provide standby peak-shaving and backup supply to the Aquidneck Island natural gas distribution system for the winters of 2022/2023 and 2023/2024 (the “Project”). The Company is requesting a two-year extension of the existing waiver so that it may operate the Project while it completes the EFSB licensing process for the Aquidneck Island Gas Reliability Project (“AIGRP”) which is the proposed long-term solution to Aquidneck Island’s natural gas capacity constraint and capacity vulnerability.¹

In support of its request, the Company offers the following description of the Project together with a summary of the Property, the Project need, outreach, and purchase plan.

A. Property

The Property is a five (5) acre parcel of which approximately 30,000 square feet will be used for the Project. The Property is owned in fee by the Company and is located on Old Mill Lane in Portsmouth adjacent to the gate station, which is the only connection between the Aquidneck Island natural gas distribution system and the interstate natural gas transmission system. The Property has been used for stand-by peak-shaving for Aquidneck Island the past

¹ If the AIGRP is approved, the Company projects that a contractor would be hired in three to four months followed by approximately six months of construction.

three winters; for temporary backup during maintenance activities on the transmission pipeline in 2018, 2021, and 2022; and for emergency backup supply following an outage in 2019.

B. Project Need

The reliability need for the Project is unquestionable and is described in detail in the Company's AIGRP Application to the EFSB which was submitted on April 1, 2022 and docketed on May 26, 2022. As noted in the AIGRP Application and in previous filings, the natural gas distribution system on Aquidneck Island is supplied by a lateral extension of the interstate natural gas pipeline which is known as the Algonquin G lateral. Aquidneck Island is at the end of the lateral which makes the natural gas supply to Aquidneck Island vulnerable to upstream supply constraints. In addition, in early 2019 the Company was made aware that the interstate pipeline operator may impose hourly supply limitations during the winter heating season. There is only one transmission system connection to Aquidneck Island, so any service interruption from a capacity vulnerability and/or capacity constraint on the transmission system may negatively impact the Company's ability to provide reliable service on Aquidneck Island. The Project addresses both capacity vulnerability and capacity constraint. Therefore, beginning the winter of 2019-2020, the Company mobilized portable LNG vaporization equipment at the Property during the winter months to maintain reliable service to its customers. The Company has identified the AIGRP as the long-term solution to these needs. The AIGRP also improves upon the Project by utilizing a revised layout that (i) moves the equipment away from the street and (ii) provides the additional space needed to visually screen the equipment and install sound mitigation walls. As noted in previous filings, this location remains the only viable location to inject additional supply into the natural gas distribution system in a manner that meets the reliability need for the winter heating seasons.

C. Project Overview

The Project will operate on the same schedule that it has for the last two winters. The Project will be mobilized in time to be online by December 1, and it will be in operation until March 31. The Project utilizes the following seasonal equipment: portable vaporizers, portable booster pumps, portable storage tanks, portable generator, and a mobile office. Setup will occur over approximately a two-week period. This summer the Company is installing a permanent perimeter fence with solid walls along the frontage and Ecoraster permeable ground support system which will eliminate the need for vegetation clearing, composite flooring mats, and temporary security fencing. These improvements should reduce the duration of construction noise associated with the mobilization and demobilization of the Project.

In connection with this waiver request, the Company will continue to follow certain operational restrictions, whenever possible, to minimize sound and traffic impacts. The conditions are as follows:

- Mobilization/Demobilization: Conducted during business hours, 8 AM to 5 PM, Monday through Friday (“Business Hours”). Any work performed on Saturday and Sunday would be limited to quiet work (e.g. no machinery, power tools, or other noise emanating apparatuses). In the event the Company is unable to follow this schedule due to equipment delays or an emergency need for mobilization, the Company will contact local officials and abutters to provide notice of the need.
- Testing/Operating:
 - LNG deliveries limited to Business Hours.
 - Tank blowdowns and cooldowns will occur during Business Hours.
 - Burner on glycol vaporizer(s) will be turned off during the evening hours.

Note that weather and/or system demands may result in the Company having to work outside of the proposed conditions in order to maintain system reliability.² Whenever possible, the Company will provide advanced notice to local officials and abutters that operations will extend into the evening hours.

The equipment will be removed once the Project is taken offline after March 31.

E. Outreach

The Company has maintained regular contact with the Towns of Portsmouth and Middletown and will continue its outreach and safety meetings with local officials throughout the period of the requested waiver extension. The Company will also maintain the Project website that includes contact information should the general public have any questions. Finally, prior to mobilizing the Project, the Company will notify town officials and the neighbors along Old Mill Lane of the scheduled work and provide the contact information for the Company's community outreach representative to address any questions.

F. Purchase Plan

Since the Project will have to operate for the next two seasons without the mitigation afforded by the redesigned AIGRP, the Company suggests offering the Purchase Plan to all of the immediate neighbors to the Project who are projected to experience noise levels that exceed 60 dBA.³ Based on modeling contours provided by HDR, Inc., there are approximately 13 homes that are projected to experience noise levels in excess of 60 dBA.⁴ The Purchase Plan

² During the Winter of 2021-2022, the LNG facility only needed one fuel delivery, and, with the exception of 10 nights, the glycol vaporizer was turned off during the evening. The system was maintained in standby for a total of 9 nights to support the natural gas distribution system and one night to complete a noise study.

³ 60 dBA is 5 dBA below the daytime noise ordinance limit which is 65 dBA between the hours of 7 AM to 10 PM and was selected to provide for a margin of error with the noise projections. As noted in the proposed conditions, the Company is limiting the nighttime operation of the facility.

⁴ The homes are shown on Attachment RR-1c, Pages 8-9 which was submitted to the EFSB on January 14, 2022.


would be available during the operation of the Project and, if approved, ending six months following the first full winter operation of the AIGRP.

If this waiver is granted, the Company will notify the property owners within thirty (30) days of the EFSB's written Order.

CONCLUSION

WHEREFORE, the Company respectfully petitions the Board to grant a waiver of the licensing requirement for the Project to operate at the Property for the winters of 2022/2023 and 2023/2024.

THE NARRAGANSETT ELECTRIC COMPANY
By its Attorney,



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