

Conservation Law Foundation
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Narragansett Electric Company's First Set of Data Requests
Issued on March 3, 2023

TNEC 1-1

Request:

Does the Conservation Law Foundation (“CLF”) dispute that on island vaporization of LNG during heating seasons (November 1 to April 1) is necessary to ensure reliable delivery of natural gas to all customers on Aquidneck Island in the event of an upstream supply disruption?

Response:

CLF does not dispute that on island vaporization of LNG during heating seasons (November 1 to April 1) is necessary to ensure reliable delivery of natural gas to all customers on Aquidneck Island in the event of an upstream supply disruption.

CLF notes, however, that it is within the power of the Company to take steps to prevent such upstream supply disruptions, and that upstream supply disruptions are rare, and may require multiple simultaneous systemic and operational failures in order to occur—as was the case during the January 2019 service outage.

Conservation Law Foundation
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Narragansett Electric Company's First Set of Data Requests
Issued on March 3, 2023

TNEC 1-2

Request:

If CLF contends that there exist alternatives to on island LNG vaporization and injection to ensure reliable delivery of natural gas to all customers on Aquidneck Island in the event of an upstream supply disruption for any heating season from 2023/24 to 2033/34, please describe that alternative in detail and indicate in which year(s) it would achieve the intended purpose.

Response:

While CLF contends that certain heating technologies and policies including electrification, energy efficiency, and demand response can and should be deployed to replace or reduce demand for gas on Aquidneck Island—thereby helping to address capacity constraint issues on Aquidneck Island and reducing greenhouse gas emissions in furtherance of state climate policy—these technologies and policies do not deliver natural gas to customers. CLF therefore does not contend that these technologies or policies can “ensure reliable delivery of natural gas to all customers on Aquidneck Island in the event of an upstream supply disruption for any heating season from 2023/24 to 2033/34.”

Conservation Law Foundation
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Narragansett Electric Company's First Set of Data Requests
Issued on March 3, 2023

TNEC 1-3

Request:

For any alternatives identified in response to Data Request TNEC 1-2, please identify the amount of customer demand, expressed in Dth/hr that CLF contends could be serviced or avoided by that alternative and explain the calculations performed to arrive at that contention.

Response:

CLF did not identify alternatives in response to Data Request TNEC 1-2.

Conservation Law Foundation
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Narragansett Electric Company's First Set of Data Requests
Issued on March 3, 2023

TNEC 1-4

Request:

For any alternatives identified in response to Data Request TNEC 1-2, please provide the cost of implementation for each year in which such expenses would be incurred in order to achieve operation in time to meet customer demand for the heating season(s) that CLF identified in response to Data Request TNEC 1-2.

Response:

CLF did not identify alternatives in response to Data Request TNEC 1-2.

Conservation Law Foundation
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Narragansett Electric Company's First Set of Data Requests
Issued on March 3, 2023

TNEC 1-5

Request:

If CLF contends that there exists a site(s) that is preferable to Old Mill Lane for the vaporization and injection of LNG into the gas distribution system serving the Company's customers on Aquidneck Island, please identify the site(s) and explain the reasons that the site(s) are preferable to the proposed Old Mill Lane site.

Response:

CLF has not identified a site (or sites) that is preferable to Old Mill Lane for the vaporization and injection of LNG into the gas distribution system serving the Company's customers on Aquidneck Island. CLF notes, however, that it performed no search for or investigation of any alternate potential sites, and that such a search would be outside the scope of CLF's role and involvement in this proceeding.

Conservation Law Foundation
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Narragansett Electric Company's First Set of Data Requests
Issued on March 3, 2023

TNEC 1-6

Request:

Please identify all preferable alternatives to natural gas heat that CLF contends would satisfy the heating demands of Aquidneck Island residents presently relying upon natural gas for any heating season from 2023/34 to 2033/34 and identify the natural gas demand, expressed in Dth/hr, eliminated for each year in which such alternative(s) would be operating.

Response:

CLF does not contend that there are preferable alternatives to natural gas heat that would entirely satisfy the heating demands of Aquidneck Island residents presently relying upon natural gas for any heating season from 2023/34 to 2033/34.

While CLF contends that certain heating technologies and policies including electrification, energy efficiency, and demand response can and should be deployed to replace or reduce demand for gas on Aquidneck Island—thereby helping to address capacity constraint issues on Aquidneck Island and reducing greenhouse gas emissions in furtherance of state climate policy—it does not contend that these technologies and policies will entirely end reliance on natural gas on Aquidneck Island for any heating season from 2023/24 to 2033/34.

For an illustration of the scale of natural gas demand that might be displaced by these technologies in the given timeframe, CLF refers the Company to TNEC's response to Middletown 2-1, which provides the cumulative design day impact of incremental energy efficiency, incremental demand response, and incremental electrification of heat under the "No Infrastructure (Match Trucked LNG @ NNS Contingency ASAP)" solution presented in the Aquidneck Island Long-Term Gas Capacity Study published in September 2020.

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2023, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and delivered physical copies to Luly Massaro, Commission Clerk.

/s/ James Crowley

 James Crowley (#9405)
 Conservation Law Foundation
 235 Promenade Street
 Suite 560, Mailbox 28
 Providence, RI 02908
 Tel: (401) 228-1905
 Fax: (401) 351-1130
 jcrowley@clf.org

Name/Address	E-mail	Phone
The Narragansett Electric Co. George Watson, Esq. Robinson & Cole LLP One Financial Plaza, 14 th Floor Providence, RI 02903 Celia O'Brien Narragansett Electric Co.	gwatson@rc.com ;	
	LPimentel@rc.com ;	
	SBoyajian@rc.com ;	
	RJReybitz@pplweb.com ;	
	COBrien@pplweb.com ;	
	jscanlon@pplweb.com ;	
	NSUcci@RIEnergy.com ;	
Division of Public Utilities and Carriers Tiffany Parenteau, Esq.	TParenteau@riag.ri.gov ;	
	Christy.hetherington@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Margaret.l.hogan@dpuc.ri.gov ;	
	Paul.roberty@dpuc.ri.gov ;	
	ellen.golde@dpuc.ri.gov ;	
Bruce Oliver	br.oliver@verizon.net ;	

Office of Energy Resources Albert Vitali, Esq. Christopher Kearns	Albert.Vitali@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	William.Owen@energy.ri.gov ;	
	Nancy.russolino@doa.ri.gov ;	
Statewide Planning Department Mary-Rose Pellegrino, Esq. Roberta Groch	MaryRose.Pellegrino@doa.ri.gov ;	
	Roberta.Groch@doa.ri.gov ;	
Town of Portsmouth Terence J. Tierney, Esq. Kevin Gavin, Town Solicitor Richard Rainer, Jr., Town Administrator Jennifer West, Town Clerk	Tierneylaw@yahoo.com ;	
	kevingavinlaw@gmail.com ;	
	rrainer@portsmouthri.com ;	
	clerkoffice@portsmouthri.com ;	
Acadia Center Hank Webster, Esq. - RI Director & Sr. Policy Advocate	HWebster@acadiacenter.org ;	
Town of Middletown Marisa Desautel, Esq. Wendy Marshall, Town Clerk	Marisa@desautelesq.com ;	
	wmarshall@middletownri.com ;	
	jeff.loiter@gmail.com ;	
	mdewey@desautelesq.com ;	
Conservation Law Foundation James Crowley, Esq. Margaret E. Curran, Esq David Hill Earnest White	jcrowley@clf.org ;	
	mcurran@clf.org ;	
	dhill@energyfuturesgroup.com ;	
	ewhite@energyfuturesgroup.com ;	
RI Attorney General Nicholas M. Vaz, Esq.	NVaz@riag.ri.gov ;	
Luly E. Massaro, Commission Clerk	Luly.massaro@puc.ri.gov ;	401-780-2107

Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Interested Parties:		
Gabrielle Stebbins	gstebbins@energyfuturesgroup.com ;	
Matt Sullivan (Green Dev)	ms@green-ri.com ;	