



DESAUTEL LAW

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March 17, 2023

VIA USPS AND ELECTRONIC MAIL

Luly Massaro, Clerk
RIPUC
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In re: PUC Docket No. 22-42-NG - The Narragansett Electric Company d/b/a Rhode Island Energy Issuance of Advisory Opinion to Energy Facility Siting Board Regarding The Narragansett Electric Co. Application to Construct LNG Vaporization Facility on Old Mill Lane, Portsmouth, RI

Dear Ms. Massaro:

Enclosed herewith please find the Town of Middletown's responses to the Narragansett Electric Company's First Set of Data Requests, to be filed in the above-entitled matter. An electronic copy of these documents were sent to the Service List updated on March 8, 2023.

Thank you for your attention to this matter. If you have any questions, please contact me at your earliest convenience.

Respectfully,

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Enclosures

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: ISSUANCE OF ADVISORY :
OPINION TO ENERGY FACILITY SITING :
BOARD RE: THE NARRAGANSETT :
ELECTRIC COMPANY’S APPLICATION : **DOCKET NO. 22-42-NG**
TO CONSTRUCT LNG VAPORIZATION :
FACILITY ON OLD MILL LANE, :
PORTSMOUTH, RI :

**TOWN OF MIDDLETOWN’S RESPONSES TO THE NARRAGANSETT ELECTRIC
COMPANY’S FIRST SET OF DATA REQUESTS**

March 17, 2023

TNEC 1-1 Does the Town of Middletown (“Middletown”) 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: Middletown points out that this request calls for a conclusion and opinion on ultimate issue that is at the heart of the subject matter of this proceeding. Further, it is the responsibility of the Company to demonstrate the need for the LNG vaporization on Aquidneck Island as part of its application to the EFSB. As such, Middletown’s position on this request shall be determined during the course of evidence in this docket.

TNEC 1-2 If Middletown 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: Middletown points out that this request attempts to shift the burden of proof in this case. As it is the responsibility of the Company to identify alternatives as part of its application to the EFSB in this docket, Middletown awaits the evidence presented by the Company to draw its conclusions.

TNEC 1-3 For any alternatives identified in response to Data Request TNEC 1-2, please identify the amount of customer demand, expressed in Dth/hr that Middletown contends could be serviced or avoided by that alternative and explain the calculations performed to arrive at that contention.

RESPONSE: Middletown points out that this request attempts to shift the burden of proof in this case. As it is the responsibility of the Company to identify alternatives as part of its application to the EFSB in this docket, Middletown awaits the evidence presented by the Company to draw its conclusions.

TNEC 1-4 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 Middletown identified in response to Data Request TNEC 1-2.

RESPONSE: Middletown points out that this request attempts to shift the burden of proof in this case. As it is the responsibility of the Company to identify alternatives to the need for the LNG vaporization on Aquidneck Island as part of its application to the EFSB in this docket, as well as expenses, Middletown awaits the evidence presented by the Company to draw its conclusions.

TNEC 1-5 If Middletown 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: Middletown points out that this request calls for a conclusion that is at the heart of the subject matter of this proceeding. As such, Middletown's position on this issue shall be determined during the course of evidence in this docket.

TNEC 1-6 Please identify all preferable alternatives to natural gas heat that Middletown 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: Middletown points out that this request calls for a conclusion that is at the heart of the subject matter of this proceeding. As such, Middletown's position on this issue shall be determined during the course of evidence in this docket. Further, Middletown points out that this request attempts to shift the burden of proof in this case. As it is the responsibility of the Company to identify alternatives to natural gas heat that would satisfy the heating demands of Aquidneck Island residents as part of its application to the EFSB in this docket, Middletown awaits the evidence presented by the Company to draw its conclusions.