

GEORGE W. WATSON III

One Financial Plaza, 14th Floor Providence, RI 02903-2485 Main (401) 709-3300 Fax (401) 709-3399 gwatson@rc.com Direct (401) 709-3351

Also admitted in Massachusetts, Connecticut and Vermont

April 19, 2023

#### VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

RE: Docket No. 22-42-NG – Issuance of Advisory Opinion to EFSB re RIE Application to Construct an LNG Vaporization Facility on Old Mill Lane, Portsmouth, RI Responses to CLF Data Requests – Set 2

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company (the "Company"), I have enclosed the Company's responses to the Conservation Law Foundation's ("CLF") Second Set of Data Requests in the above-referenced docket. Please note that Attachment CLF 2-1 is provided in Excel format.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3351.

Sincerely,

George W. Watson III

**Enclosures** 

cc: Docket 22-42-NG Service List

#### Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Heidi J. Seddon April 19, 2023
Date

Docket No. 22-42-NG – Needs Advisory Opinion to EFSB regarding Narragansett Electric LNG Vaporization Facility at Old Mill, Portsmouth, RI Service List update 4/6/2023

Name/Address	E-mail	Phone
The Narragansett Electric Co. George Watson, Esq. Robinson & Cole LLP One Financial Plaza, 14 <sup>th</sup> Floor Providence, RI 02903  Celia O'Brien Narragansett Electric Co.	gwatson@rc.com;	
	I.D.	
	LPimentel@rc.com;	
	SBoyajian@rc.com;	
	RJReybitz@pplweb.com;	
	COBrien@pplweb.com;	
	jscanlon@pplweb.com;	
	NSUcci@RIEnergy.com;	
<b>Division of Public Utilities and Carriers</b> 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.roberti@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	MaryRose.Pellegrino@doa.ri.gov;	
Mary-Rose Pellegrino, Esq. Roberta Groch	Roberta.Groch@doa.ri.gov;	
Roberta Groen		
Town of Portsmouth	Tierneylaw@yahoo.com;	
Terence J. Tierney, Esq. Kevin Gavin, Town Solicitor	kevingavinlaw@gmail.com;	
Richard Rainer, Jr., Town Administrator		
Jennifer West, Town Clerk	rrainer@portsmouthri.com;	
	clerkoffice@portsmouthri.com;	
Andia Conton	IWahatan@aaadiaaantan aga	
Acadia Center Hank Webster, Esq RI Director & Sr.	HWebster@acadiacenter.org;	
Policy Advocate		
Town of Middletown	Marisa@desautelesq.com;	
Marisa Desautel, Esq.	wmarshall@middletownri.com;	
Wendy Marshall, Town Clerk	jeff.loiter@gmail.com;	
	, , , , , , , , , , , , , , , , , , ,	
Conservation Law Foundation	jcrowley@clf.org;	
James Crowley, Esq.		
Margaret E. Curran, Esq	mcurran@clf.org;	
David Hill	dhill@energyfuturesgroup.com;	
Earnest White	ewhite@energyfuturesgroup.com;	
RI Attorney General Nicholas M. Vaz, Esq.	NVaz@riag.ri.gov;	
Tyleholas IVI. Vaz, Esq.	mbedell@riag.ri.gov;	
Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b>	Luly.massaro@puc.ri.gov;	401-780-2107
89 Jefferson Blvd.	Cynthia.WilsonFrias@puc.ri.gov;	
Warwick, RI 02888	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;	

The Narragansett Electric Company
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 Conservation Law Foundation's Second Set of Data Requests
Issued on April 5, 2023

# CLF 2-1

## Request:

Please refer to the Company's response to CLF 1-12, and update the data therein through April 5, 2023.

# Response:

See Attachment CLF 2-1. Please note the attached data set includes a slight modification for December 2022. The original data set produced in response to CLF 1-12 did not include volumes from the Old Mill Lane portable LNG facility. This set now includes those volumes along with the additional requested dates.

The Narragansett Electric Company
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 Conservation Law Foundation's Second Set of Data Requests
Issued on April 5, 2023

# Attachment CLF 2-1

Please see the Excel Worksheet of Attachment CLF 2-1

The Narragansett Electric Company
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 Conservation Law Foundation's Second Set of Data Requests
Issued on April 5, 2023

#### **CLF 2-2**

## Request:

Please refer to the Company's response to CLF 1-13. Has the Company used the Old Mill Lane site to address any capacity constraints or capacity vulnerabilities during the 2022/2023 heating season? If so, please identified date, time, cause, and length of operation. If not, please, provide the date, times, cause, and length of operation for times the Old Mill Lane site was used during the 2022/2023 heating season.

#### Response:

Please see the Company's responses to Data Requests DIV 2-1, DIV 3-7 and DIV 3-8.