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VIA HAND DELIVERY & ELECTRONIC MAIL

March 28, 2023

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**

Dear Ms. Massaro:

On behalf The Narragansett Electric Company (the “Company”), I have enclosed the Response of The Narragansett Electric Company to Briefing Question of the Public Utilities Commission.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Very truly yours,



Steven J. Boyajian

Copy to: Docket 22-42-NG Service List

**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 :

**RESPONSE OF THE NARRAGANSETT ELECTRIC COMPANY TO BRIEFING
QUESTION OF THE PUBLIC UTILITIES COMMISSION**

I. INTRODUCTION

In April 2022, The Narragansett Electric Company (the “Company”) filed an application for a license from the Energy Facility Siting Board (the “EFSB” or “Board”) to construct and operate a portable liquefied natural gas (“LNG”) vaporization facility on Company-owned property located at 111 Old Mill Lane in Portsmouth, Rhode Island (the “Project”).¹ In connection with the Board’s licensing process, the Board has sought an advisory opinion from the Rhode Island Public Utilities Commission (the “PUC” or “Commission”) as detailed in EFSB Order No. 156.² On November 18, 2022, the Commission issued a briefing question in this docket which asks the Company and the Rhode Island Division of Public Utilities and Carriers (the “Division”) to explain “[w]hether a project designed to serve only a portion of the state, Aquidneck Island, which is served by a single natural gas pipeline, falls within the definition of ‘necessary to meet the needs of the state and/or region.’”³

¹ EFSB Docket No. SB-2021-04.

² PUC Docket No. 22-42-NG.

³ The Commission’s Briefing Question also specifically requested that a response consider: “(1) Whether the possibility of a supply constraint or contingency event to one portion of the state where there are other areas of the state with no access to gas supply at all is a ‘need of the state’ standard in the Energy Facility Siting Act. (2) Whether the utility has a legal/regulatory duty to serve future incremental growth in customers and/or usage and if so, how that duty correlates to a “need of the state” standard in the Energy Facility Siting Act.

At the outset it is important to note that the quoted portion of R.I. Gen. Laws § 42-98-11(b)(1) in the briefing question is taken out of context in a way that is material under the circumstances. In assessing the need for a proposed major energy facility, R.I. Gen. Laws § 42-98-11(b)(1) requires a determination of whether the “facility is necessary to meet the needs of the state and/or region *for energy of the type to be produced by the proposed facility.*” (Emphasis added.) For the reasons below, the Company’s response is yes, the Project, which is designed to ensure a reliable supply of natural gas to Aquidneck Island, is “necessary to meet the needs of the state and/or region for energy of the type to be produced.”

II. BACKGROUND

The Company’s response to the Commission’s question must be understood in the context of the Company’s statutory and regulatory obligations as the state’s only natural gas distribution company and the facts and circumstances surrounding the Project. This is because the analysis of need required under R.I. Gen. Laws § 42-98-11(b)(1) is ultimately a factual question, not a legal one.

A. The Company has a statutory and regulatory obligation to provide safe, reliable, and adequate service to all of its customers.

Rhode Island state law requires public utilities to “furnish safe, reasonable, and adequate services and facilities” to utility customers.⁴ This duty includes the requirement that public utilities “use all reasonable means to avoid accidental interruptions to service.”⁵ Applicable state

(3) Whether or how the utility’s legal/regulatory duty to provide reliable service to existing customers under the type of contingency event described in the filing correlates to a ‘need of the state’ standard in the Energy Facility Siting Act.”

⁴ R.I. Gen. Laws § 39-2-1(a).

⁵ 815 R.I.C.R. § 20-00-1.5(C)(1).

regulations require public utilities to construct, install, maintain, and operate facilities to assure the continuity of gas service.⁶ All public utility infrastructure, pipelines, and equipment must also be constructed, installed, operated, and maintained in “such a manner as to best accommodate the public.”⁷ State law recognizes that “reasonably priced, reliable sources of energy are vital to the well-being and prosperity of the people of this state,”⁸ and it is a declared policy of the state to ensure that “the facilities required to meet the energy needs of this and succeeding generations of Rhode Islanders are planned for, considered, and built in a timely and orderly fashion.”⁹

B. The need for reliable natural gas service on Aquidneck Island.

Aquidneck Island includes the Towns of Middletown and Portsmouth and the City of Newport. The island is home to approximately 60,000 residents—approximately one out of every twenty Rhode Islanders. The vast majority of Newport County’s gross domestic product, more than \$7 billion in 2021 (which was more than 11 percent of Rhode Island’s Gross Domestic Product), originates on Aquidneck Island. Aquidneck Island is home to a major hospital and the only quickly accessible emergency room for many Rhode Islanders when in need of urgent care. It also hosts more than a dozen nursing homes and assisted living facilities. Aquidneck Island hosts two armed services installations at Naval Station Newport and Coast Guard Station Castle Hill and a large campus of a major defense contractor where more than 1,000 people are employed. A Rhode Island State Police Barracks, a state airport, and a state courthouse can all

⁶ 815 R.I.C.R. § 20-00-1.7(A)(1).

⁷ 815 R.I.C.R. § 20-00-1.7(B).

⁸ R.I. Gen. Laws § 42-98-1.

⁹ R.I. Gen. Laws § 42-98-2.

be found on Aquidneck Island. The island is home to a university, a community college, and dozens of elementary and secondary schools. The City of Newport, once the capital of Rhode Island, is the state's principal tourist center and resort community. Newport is visited annually by millions of tourists.¹⁰ In 2018, there was an estimated \$919 million in direct travel economy spending in Newport resulting in estimated state and local tax revenue of over \$130 million.¹¹

The natural gas distribution system on Aquidneck Island is reliant on a single source of supply from the G-2 lateral of the Algonquin Gas Transmission system. The Project is designed to provide a backup to that supply to safeguard against supply constraints and interruptions on the transmission system. The Company has determined that a secondary supply is the only way to ensure reliable service to Aquidneck Island at this time, and none of the testimony submitted by the intervenors in this docket seems to challenge this conclusion. This Project is consistent with the recommendations of the Division in its Investigation Report of Summary Investigation Into the Aquidneck Island Gas Service Interruption of January 21, 2019 (the "Division Report").¹² The Division Report specifically recommended that portable LNG vaporization facilities be deployed on Aquidneck Island and posited that the lack of such facilities was a contributing factor to the outage.¹³ The Project represents the Company's attempt to use "all reasonable means"¹⁴ to avoid any interruption in the gas supply to Aquidneck Island and assure

¹⁰ The City of Newport Rhode Island, Visitors, Tourism, 2023 (available at: <https://www.cityofnewport.com/visiting-newport/around-the-city/tourism>).

¹¹ Economic Impact of tourism in Newport, Tourism Economics An Oxford Economics Company, August 2019, (available at: https://assets.simpleviewinc.com/simpleview/image/upload/v1/clients/newportri/2018_Economic_Impact_2018_9ab62c13-709f-4662-ad87-e0ec2a62a17a.pdf).

¹² Division Report, at 67 (available at: https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/AI_Report.pdf).

¹³ Division Report at 7.

¹⁴ 815 R.I.C.R. § 20-00-1.5(C)(1).

the continuation of gas service to the thousands of residential, commercial, industrial, government and health care customers the Company serves on Aquidneck Island. The Company's failure to seek to implement a constructible and reasonable cost solution to the gas supply vulnerabilities of Aquidneck Island would represent an abdication of its statutory and regulatory obligations.

Although there may be some residents in the state who would be not be directly affected by an interruption of energy supply to Aquidneck Island, any interruption of an essential source of energy to thousands of residents, businesses, and institutions on Aquidneck Island (or in any other region of the state) has statewide impacts regardless of the fact that many Rhode Island residents, including many on Aquidneck Island, do not receive natural gas service from the Company. When the gas supply to Aquidneck Island was interrupted in January 2019 during a period of extraordinarily cold weather, then Governor Raimondo declared a state of emergency, The National Guard was mobilized, schools were closed, and warming centers and pet shelters were opened. Following the outage, the State of Rhode Island established an emergency loan fund to assist businesses impacted.

III. ANALYSIS

A. An energy facility can “meet the needs of the state and/or region” as that phrase is employed in R.I. Gen. Laws § 42-98-11(b)(1)-(2), without supplying the entire state with energy.

To obtain Board approval, proponents of major energy facilities must show that a proposed facility is “necessary to meet the needs of the state and/or region for energy of the type to be produced by the proposed facility.” *See* R.I. Gen. Laws § 42-98-11(b)(1)-(2). Rhode Island law does not require every major energy facility to serve every resident or municipality in the state to meet this standard. As a practical matter, the direct impact of most projects that are

reviewed by the Board are regional and not state-wide and are constructed and operated to respond to the energy needs of a portion of the state or region.

The Commission has previously issued advisory opinions finding a need under R.I. Gen. Laws § 42-98-11(b)(1) for projects intended to address reliability concerns and load growth in a region of the state although the projects would not deliver energy to utility customers throughout the state. For example, in Docket No. 4614, the Commission found a need for the Aquidneck Island Reliability Project (the “AIRP”) to address reliability concerns and load growth with respect to the supply of electricity to Aquidneck Island customers.¹⁵ That the AIRP would not serve the energy needs of the electric customers *not* on Aquidneck Island, or the energy needs of other electric distribution companies’ customers in Rhode Island, did not alter the fact that the AIRP was necessary. Similarly, in Docket No. 3732, the Commission concluded that the construction of transmission lines, tap lines, and a new substation was needed to address reliability concerns and the forecasted load growth for electric customers in southern Rhode Island.¹⁶ In matters where the EFSB did not seek advisory opinions from the Commission, the EFSB has similarly found a need for projects that were intended to ensure reliable delivery of energy to only a portion of the state. Within the past ten years, the EFSB has found that electrical system repairs and upgrades that would provide reliability benefits to only a portion of

¹⁵ Advisory Opinion, *In re Issuance of an Advisory Opinion to the Energy Facility Siting Board Regarding The Narragansett Electric Company d/b/a National Grid Application to Construct the Aquidneck Island Reliability Project in Portsmouth and Middletown, Rhode Island*, Docket No. 4614, at 3 (stating, “The Aquidneck Island Reliability Project is needed to meet the reliability needs of the area served, particularly where studies have shown that the load is continuing to grow despite a declining population.”) (Emphasis added.)

¹⁶ Advisory Opinion to the Energy Facility Siting Board Pursuant to R.I. Gen. Laws § 42-98-9(d), *In re Issuance of an Advisory Opinion to the Energy Facility Siting Board Regarding The Narragansett Electric Company d/b/a National Grid’s Application to Construct Major Energy Facilities*, Docket No. 3732, at 13 (stating, “the record shows that the Project is required for the continued maintenance of a firm and reliable electric supply to the geographic area in issue. The record further reflects that the Project represents a solution to the growing load demand.”) (Emphasis added.)

the state were needed as required under R.I. Gen. Laws § 42-98-11(b)(1). Some of these projects are listed below:

- the reconductoring of 4.2 miles of the V-148N 115 kV transmission line to ensure reliable service to northern Rhode Island electric customers (Docket No. SB-2015-03);¹⁷
- the reconductoring of 2.2 miles of the J-16 115 kV transmission line to ensure reliable service to northern Rhode Island electric customers (Docket No. SB-2015-04);¹⁸
- the reconductoring of 5.3 miles of the G-185S 115 kV transmission line to ensure reliable service to electric customers in southern Rhode Island (Docket No. SB-2014-01);¹⁹ and
- the refurbishment of 4.8 miles of the V-148S 115kV transmission line to ensure reliable service to northern Rhode Island electric customers (Docket No. SB-2022-01).²⁰

With respect to each of these projects, the EFSB found a need, as required under R.I. Gen. Laws § 42-98-11(b)(1), based solely upon the need to ensure reliable service to those in the affected region be it northern Rhode Island, southern Rhode Island, or Aquidneck Island. Although neither the Commission nor the Board elaborated upon the question of whether an energy facility serving a portion of the state serves the entire state's need for energy, it is implicit in the cited advisory opinions and orders that the state needs all of its regions to have access to a reliable supply of the type of energy upon which residents rely.

¹⁷ Decision and Order, *In re The Narragansett Electric Company d/b/a National Grid's Notice of Intent Application for Approval V-148N 115 kV Transmission Line Reconductoring Project*, Docket No. SB-2015-03, at 4.

¹⁸ Decision and Order, *In re The Narragansett Electric Company d/b/a National Grid's Notice of Intent Application for Approval J16 115 kV Transmission Line Reconductoring Project*, Docket No. SB-2015-04, at 4.

¹⁹ Decision and Order, *In re The Narragansett Electric Company d/b/a National Grid's Notice of Intent Application for Approval G-185S 115 kV Transmission Line Reconductoring Project*, Docket No. SB-2014-01, at 5.

²⁰ Decision and Order, *In re The Narragansett Electric Company d/b/a National Grid's Notice of Intent Application for Approval V-148S 115 kV Transmission Line Reconductoring Project*, Docket No. SB-2015-03, at 5.

The need of the state that is addressed by the Project is the need for Aquidneck Island to have a continuous and reliable supply of natural gas for the thousands of customers that rely upon it. Any reading of R.I. Gen. Laws § 42-98-11(b)(1) that would require an energy facility to serve every Rhode Island resident or municipality for a project to address a need of the state and/or region is wooden and overly formalistic. In addition, it would be inconsistent with the prior determinations of the Commission and EFSB that energy facilities can be needed even though the facility is designed to address the energy needs of only a region of the state. The disruption of the energy supply to Aquidneck Island, of the type that has already occurred, and that the Project is intended to prevent, is a crisis of statewide importance and effect. Reliable delivery of energy to any region of the state where significant numbers of customers rely upon it is an energy need of the entire state. In apparent recognition of the importance of reliable energy supply to all regions of the state, R.I. Gen. Laws § 42-98-11(b)(1) requires that energy needs be assessed for the “state and/or region,” and in applying this statute the Commission and EFSB have repeatedly found a need for projects that are intended to address reliability for only a region of the state rather than the entirety of the state.

B. Company’s Response to Additional Questions Posed by the Commission.

In asking that the parties address the general question of whether a facility designed to provide energy to a portion of the state addresses the needs of the “state and/or region,” the Commission asked that the parties address three subsidiary questions. The responses to these questions follow from the language of the Energy Facility Siting Act itself and from the Company’s obligations under statutes, regulations, and the terms of its tariff.

1. *Whether the possibility of a supply constraint or contingency event to one portion of the state where there are other areas of the state with no access to gas supply at all is a “need of the state” standard in the Energy Facility Siting Act.*

As explained above, the question posed takes the quoted statutory language out of context. R.I. Gen. Laws § 42-98-11(b)(1) requires an assessment of the “needs of the state and/or region *for energy of the type to be produced by the proposed facility.*” (Emphasis added.) The possibility of a supply constraint or contingency event interrupting continuous natural gas to one region of the state is a “need of the state” that must be addressed by the Company if customers in that region rely upon natural gas. This is true irrespective of the fact that: (1) there are regions of the state with no access to the gas distribution system; and (2) certain Rhode Island residents and/or businesses having access to the gas distribution system opt to use a different source of energy. In short, if Aquidneck Islanders rely upon natural gas, which several thousand do, then there is a need “for energy of the type to be produced by the proposed facility” even if (i) other regions of the state are not served by the Company’s natural gas system or (ii) others in the same region are not served by the Company’s natural gas system.²¹

The Company’s duty to provide reliable service to gas customers is not absolved by the fact that there are Rhode Island residents who do not have access to, or by choice do not use, natural gas. A Rhode Island resident or business that does not rely on the gas distribution system – either because they are in an area that is not presently served by the Company or because they opted to avail themselves of a different energy source – will not necessarily suffer a direct impact from by a supply constraint or contingency event affecting natural gas supply. It would be a direct violation of Rhode Island law, however, for the Company to absolve itself from its duty to provide safe and reliable service to its existing customers and service areas simply because there

²¹ See R.I. Gen. Laws § 42-98-11(b)(1).

are areas of the state without gas service. The Public Utilities Act requires the Company to “furnish safe, reasonable, and adequate services and facilities” for its customers.²² Division regulations require that the Company “use all reasonable means to avoid accidental interruptions to service,” and construct, install, maintain, and operate facilities to assure the continuity of gas service.²³ Prior Commission advisory opinions and EFSB orders have repeatedly recognized that facilities designed to address the reliability needs of a region of the state are needed even if they do not serve the entire state.²⁴ A resident of Pascoag, who is not a customer of the Company, might not be directly affected by a lack of reliable electric service to East Greenwich and a Block Islander might not be directly affected by an Aquidneck Island gas outage. Just as the reliable supply of electricity to southern Rhode Islanders is necessary under R.I. Gen. Laws § 42-98-11(b)(1),²⁵ so too is the reliable delivery of natural gas to Aquidneck Island for as long as its residents rely upon it.

The prior interruption of natural gas supply to Aquidneck Island had far reaching consequences and presented a crisis of statewide proportions. For as long as any future interruptions would have similar effects, the facilities required to prevent such an interruption are needed under R.I. Gen. Laws § 42-98-11(b)(1).

²² R.I. Gen. Laws § 39-2-1(a).

²³ 815 R.I.C.R. § 20-00-1.5(C)(1); 815 R.I.C.R. § 20-00-1.7(A)(1).

²⁴ See Section III.B *supra*.

²⁵ See Advisory Opinion to the Energy Facility Siting Board Pursuant to R.I. Gen. Laws § 42-98-9(d), Docket No. 3732, at 13 (stating, “the record shows that the Project is required for the continued maintenance of a firm and reliable electric supply to the geographic area in issue. The record further reflects that the Project represents a solution to the growing load demand.”) (Emphasis added.)

2. *Whether the utility has a legal/regulatory duty to serve future incremental growth in customers and/or usage and if so, how that duty correlates to a “need of the state” standard in the Energy Facility Siting Act.*

The Company’s natural gas tariff²⁶ sets forth the terms of the Company’s service obligations to its existing customers and the conditions under which the Company can refuse applications for new service. With respect to existing customers, the Gas Tariff does not generally permit the Company to limit a firm customers’ usage and it requires the Company to “make every reasonable effort to maintain an uninterrupted supply of gas for all firm customers.”²⁷ Therefore, with respect to incremental growth in *usage*, the Company has a duty to meet the demands of its existing customers both under the Gas Tariff and R.I. Gen. Laws § 39-2-1. The Company’s duty to provide adequate facilities to meet the increased usage demands of existing customer correlates to the need analysis under R.I. Gen. Laws § 42-98-11(b)(1) insofar as the Company’s forecasted load growth, coupled with the need to ensure reliable service to a region of the state, has been determined to be a need that satisfies the requirements R.I. Gen. Laws § 42-98-11(b)(1).²⁸ Therefore, the forecasted increase in usage by Company customers is a sufficient basis for a finding of need under R.I. Gen. Laws § 42-98-11(b)(1) to permit construction those facilities necessary to address that need.

With respect to the potential for incremental growth in the number of Company customers, it too could cause an increase in forecasted customer demand sufficient to support a finding of need under R.I. Gen. Laws § 42-98-11(b)(1). The Company’s Gas Tariff does not

²⁶ R.I.P.U.C. NG-GAS No. 101 (the “Gas Tariff”).

²⁷ Gas Tariff, Section 1, Schedule A, Sheet 10, §10.0.

²⁸ Advisory Opinion, Docket No. 4614, at 3 (stating, “The Aquidneck Island Reliability Project is needed to meet the reliability needs of the area served, *particularly where studies have shown that the load is continuing to grow despite a declining population.*”) (Emphasis added.)

generally permit the Company to deny applicants for gas services within the Company's service territory. The Gas Tariff provides that, "The Company *shall furnish service to applicants* under the filed rates and in accordance with these Terms and Conditions and the rules and regulations of the PUC and the Division."²⁹ The Gas Tariff does provide exceptions to this general duty to serve applicants for gas service within the Company's service territory. For example:

The Company may refuse to supply service to loads of unusual characteristics which, in its sole judgment, might adversely affect the quality of service supplied to other customers, the public safety, or the safety of the Company's personnel. In lieu of such refusal, the Company may require a customer to install any necessary regulating and protective equipment in accordance with the requirements and specifications of the Company.³⁰

In addition to this exception to the duty to serve, "[t]he Company reserves the right to . . . refuse to connect its service if, to its knowledge and in its judgment, the Customer's installation has become or is unsafe, defective, or in violation of the Company's policies or any ordinances, laws, codes, or regulations."³¹ The Company may also deny service to an applicant if the cost of installing the facilities necessary to provide the service would outweigh the revenue to be received at applicable rates, if the applicant for service is indebted to the Company or if the applicant is a commercial customer who refuses to pay a deposit requested by the Company.³²

The Gas Tariff's general statement that the Company "shall" provide service to applicants in its service territory coupled with the specification of particular reasons that the Company can deny service to new customers under the Gas Tariff leads to the conclusion that the Company cannot deny service to applicants for has service as a general matter or for reasons not specified in the

²⁹ Gas Tariff, Section 1, Schedule A, Sheet 3, § 3.0.

³⁰ *Id.* at Sheet 5-6, § 6.0.

³¹ *Id.* at Sheet 9-10, § 8.0.

³² *Id.* at Sheet 2, § 3.0 and 5, § 5.0.

Gas Tariff.³³ As explained above, the Commission has previously and properly opined that anticipated load growth can cause a need for constructions of new energy facilities under R.I. Gen. Laws § 42-98-11(b)(1).³⁴ Therefore, in the absence of a specified exception to the Company's duty to provide service to applicants for gas service within its service territory, the Company must plan for any forecasted load growth resulting from an increase in the number of customers receiving service and any facilities required to address that need can satisfy the need requirement of R.I. Gen. Laws § 42-98-11(b)(1).

3. *Whether or how the utility's legal/regulatory duty to provide reliable service to existing customers under the type of contingency event described in the filing correlates to a "need of the state" standard in the Energy Facility Siting Act.*

As stated above, the Company has a duty to use "all reasonable means" to avoid an accidental interruption of gas service to its customers.³⁵ The Project is being proposed, in part, as a response to the January 2019 interruption of gas supply to Aquidneck Island and would fulfill one of the recommendations of the Aquidneck Investigation Report that followed the investigation into that interruption. The Company must plan to respond to contingency events such as an interruption of upstream supply along the single transmission pipeline serving Aquidneck Island and extremely cold days when the available gas supply to Aquidneck Island is

³³ See *id.* at Sheet 2, § 3.0; *Gorman v. Gorman*, 883 A.2d 732, 738 (R.I. 2005) (stating, "The venerable maxim of contract interpretation *expressio unius est exclusio alterius* is frequently a helpful interpretive guide in situations like the present one. See 5 Corbin on Contracts (*Interpretation of Contracts*) § 24.28 at 315–16 (Margaret N. Kniffin, rev. ed. 1998) ("The maxim *expressio unius est exclusio alterius* means literally "the expression of the one is the exclusion of the other." If the parties in their contract have specifically named one item or if they have specifically enumerated several items of a larger class, a reasonable inference is that they did not intend to include other, similar items not listed.').")

³⁴ Advisory Opinion, Docket No. 4614, at 10 (stating, "We count [on the electric distribution and transmission system] to maintain safe and comfortable homes, businesses and schools and we require a reliable electric grid to maintain a strong economy. National Grid's proposed Aquidneck Island Reliability Project to *meet the current reliability needs and future load growth needs.*") (Emphasis added.)

³⁵ 815 R.I.C.R. § 20-00-1.5(C)(1).

insufficient to meet customer demands. The Project is the Company's effort to do just that. For the reasons explained above in sections III.A and III.B.1, the Project, which will help to ensure the reliable delivery of natural gas to Aquidneck Island for existing customers, is "necessary to meet the needs of the state and/or region for energy of the type to be produced by the proposed facility."³⁶

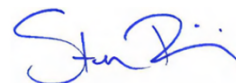
IV. CONCLUSION

For the foregoing reasons, the Company submits that the Project is "necessary to meet the needs of the state and/or region for energy of the type to be produced by the proposed facility," in that it will ensure that Aquidneck Island has a backup supply of natural gas to address the supply vulnerability and constraint that exists because of the island's location at the terminus of a single six inch gas transmission pipeline.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC
COMPANY

By its attorneys,



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Dated: March 28, 2023

³⁶ R.I.G.L. § 42-98-11.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Company’s Response of The Narragansett Electric Company to Briefing Question of the Public Utilities Commission was delivered to the Service List associated with the Docket via electronic mail this March 28, 2023.

Brenda L. Vucci

**Docket No. 22-42-NG – Needs Advisory Opinion to EFSB regarding Narragansett Electric LNG Vaporization Facility at Old Mill, Portsmouth, RI
Service List update 2/13/2023**

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