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May 3, 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 DIV Data Requests – Set 4

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company (the “Company”), I have enclosed the Company’s responses to the Division of Public Utilities and Carriers’ Fourth Set of Data Requests in the above-referenced docket.

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

May 3, 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**

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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 the Division's Fourth Set of Data Requests
Issued on April 27, 2023

DIV 4-1

Request:

Please identify all facility components of the proposed permanent LNG facility, including a listing of:

- a. all structures or appurtenances and their intended functions;
- b. all foundational support requirements;
- c. all required grading/surface preparation;
- d. all required changes in piping and changes in the configuration of and/or upgrades to required electrical equipment.

Response:

The Company is not proposing to construct a permanent LNG facility as the request suggests. Rather, the Company is proposing to construct certain appurtenances to support the seasonal deployment of portable LNG storage and vaporization equipment that will be located on site during the heating season and to support customer demand during scheduled pipeline maintenance and construction activity.

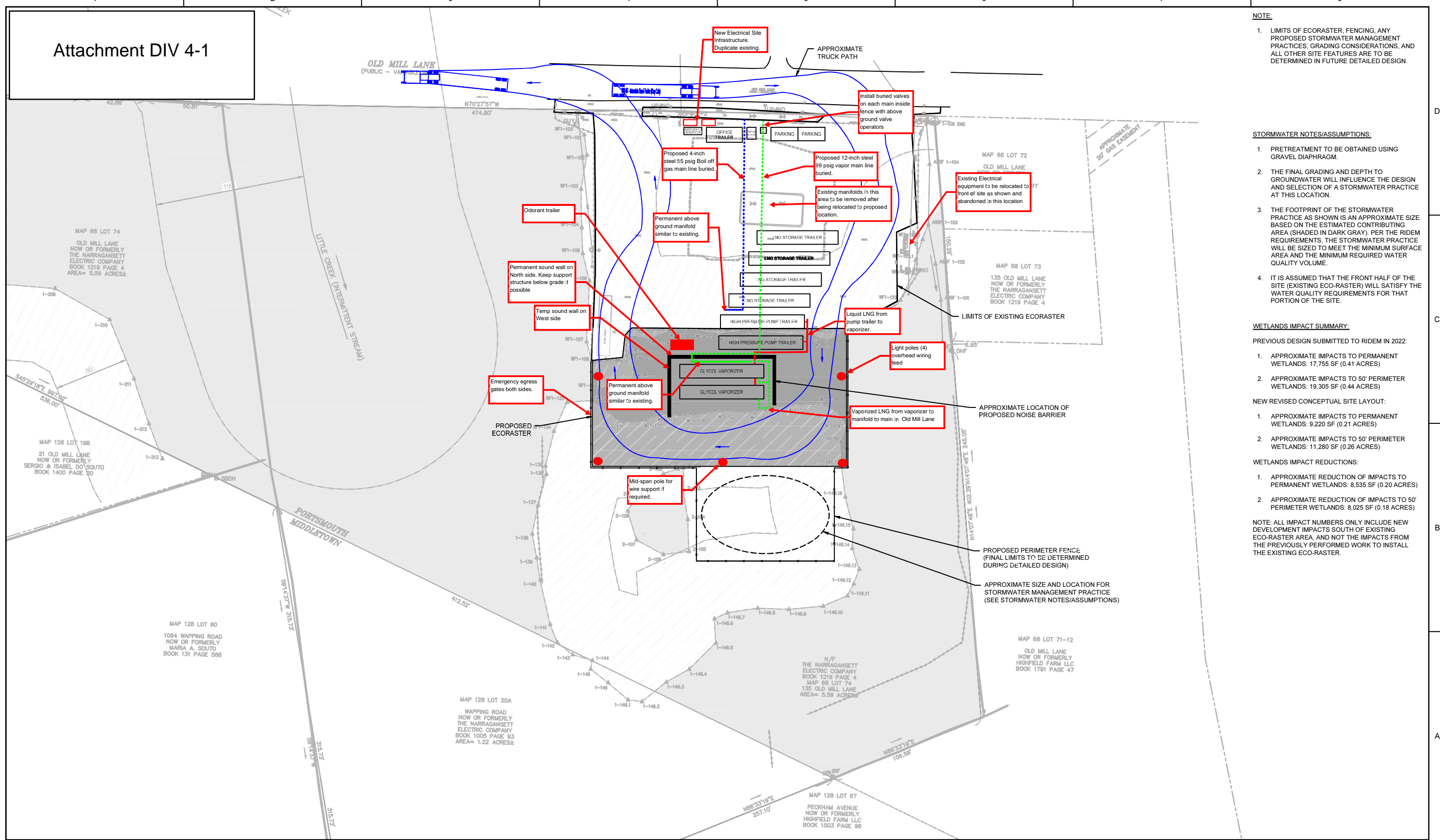
- a. There are no permanent buildings or structures planned for the site except for one proposed sound wall that is currently being engineered. Utility poles for site lighting may be relocated or added for the proposed equipment location with care given to not over illuminate the site. All other equipment proposed for use is mobile and is brought to the site in November and removed from the site in April.
- b. The mobile equipment does not require foundation support, however, there may be a support foundation for the noise wall that is currently being engineered. If a support foundation is necessary, it will most likely be buried and not visible.
- c. The grading plan for the site is currently being engineered, however, in general, the site will be graded such that it is higher at the front of the site at Old Mill Lane and will have a negative slope towards the rear of the site. The entire site is also proposed

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- to have a permeable surface installed, which allows natural drainage to occur into the undisturbed earth below.
- d. There are two manifolds currently on site. It is proposed that these manifolds be relocated towards the rear of the site where the vaporizers and storage tanks would be located. The current manifolds would then be abandoned and removed. Please refer to attached plan Attachment DIV 4-1. The electrical equipment is proposed to be relocated towards the front of the site inside the fence as shown on Attachment DIV 4-1. The existing electrical equipment would then be retired and removed.

Attachment DIV 4-1



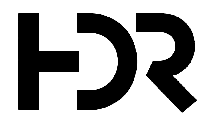
NOTE:
 1. LIMITS OF ECORASTER, FENCING, ANY PROPOSED STORMWATER MANAGEMENT PRACTICES, GRADING CONSIDERATIONS, AND ALL OTHER SITE FEATURES ARE TO BE DETERMINED IN FUTURE DETAILED DESIGN.

STORMWATER NOTES/ASSUMPTIONS:
 1. PRETREATMENT TO BE OBTAINED USING GRAVEL DIAPHRAGM.
 2. THE FINAL GRADING AND DEPTH TO GROUNDWATER WILL INFLUENCE THE DESIGN AND SELECTION OF A STORMWATER PRACTICE AT THIS LOCATION.
 3. THE FOOTPRINT OF THE STORMWATER PRACTICE AS SHOWN IS AN APPROXIMATE SIZE BASED ON THE ESTIMATED CONTRIBUTING AREA (SHADED IN DARK GRAY). PER THE RIDEM REQUIREMENTS, THE STORMWATER PRACTICE WILL BE SIZED TO MEET THE MINIMUM SURFACE AREA AND THE MINIMUM REQUIRED WATER QUALITY VOLUME.
 4. IT IS ASSUMED THAT THE FRONT HALF OF THE SITE (EXISTING ECO-RASTER) WILL SATISFY THE WATER QUALITY REQUIREMENTS FOR THAT PORTION OF THE SITE.

WETLANDS IMPACT SUMMARY:
 PREVIOUS DESIGN SUBMITTED TO RIDEM IN 2022:
 1. APPROXIMATE IMPACTS TO PERMANENT WETLANDS: 17,755 SF (0.41 ACRES)
 2. APPROXIMATE IMPACTS TO 50' PERIMETER WETLANDS: 19,305 SF (0.44 ACRES)
 NEW REVISED CONCEPTUAL SITE LAYOUT:
 1. APPROXIMATE IMPACTS TO PERMANENT WETLANDS: 9,220 SF (0.21 ACRES)
 2. APPROXIMATE IMPACTS TO 50' PERIMETER WETLANDS: 11,280 SF (0.26 ACRES)

WETLANDS IMPACT REDUCTIONS:
 1. APPROXIMATE REDUCTION OF IMPACTS TO PERMANENT WETLANDS: 8,535 SF (0.20 ACRES)
 2. APPROXIMATE REDUCTION OF IMPACTS TO 50' PERIMETER WETLANDS: 8,025 SF (0.18 ACRES)

NOTE: ALL IMPACT NUMBERS ONLY INCLUDE NEW DEVELOPMENT IMPACTS SOUTH OF EXISTING ECO-RASTER AREA, AND NOT THE IMPACTS FROM THE PREVIOUSLY PERFORMED WORK TO INSTALL THE EXISTING ECO-RASTER.



ISSUE	DATE	DESCRIPTION
1	03/2023	CONCEPT ISSUED FOR REVIEW

PROJECT MANAGER	ANKIT DHAR
DESIGNED BY	T. VANDERVORT
DRAWN BY	W. LIN
CHECKED BY	J. DENNIS
APPROVED BY	A. DHAR
PROJECT NUMBER	10328992

**PRELIMINARY
 NOT FOR
 CONSTRUCTION**

**RHODE ISLAND ENERGY
 AQUIDNECK ISLAND GAS RELIABILITY PROJECT
 OLD MILL LANE, PORTSMOUTH, RI**
 TOWNSHIP OF PORTSMOUTH
 MAP 68, LOT 74

**REVISED CONCEPTUAL SITE LAYOUT
 DRAFT**

0 1" 2"
 SCALE 1"= 30'

FILENAME C-2-3.DWG
 SHEET C-2

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DIV 4-2

Request:

In reference to the Direct Testimony of witness Montigny, please provide a detailed breakdown of the elements of the \$12,649,304 site preparation cost estimate. If there have been any further updates to the cited cost estimate, please also provide a cost breakdown for the any such updated cost estimate.

Response:

Please refer to previously submitted Attachment PUC 1-12-1 for the requested cost breakdown.

The Direct Testimony of Witness Montigny presented an adjusted estimate of \$12,649,304, as a result of deducting two costs that were believed to be annual operational costs. The amounts deducted were \$823,215 for pipe racks, vaporizers, trucking, liquid processing equipment and \$150,000 for 24-hour Security. After subtracting those two amounts, the final adjusted cost came to \$12,649,304. Please refer to Attachment DIV 4-2. The line items deducted are shown in red.

Old Mill Lane Estimate Assumptions w/ LNG Winter Ops Subtracted

Item	Assumption	Cost
Labor	Internal Labor to support Project	\$750,000
Civil Improvements	Vegetation removal, grading, gas main relocation, manifold relocation, environmental features, site infrastructure, fencing, paving	\$937,500
Process Systems	Pipe racks, vaporizers, trucking, liquid processing equipment	\$0
Nitrogen	Nitrogen for purging	\$150,000
Security	On-site 24 hour	\$0
Plant Improvements	Electrical, above ground hard pipe to reduce use of hoses.	\$225,000
SUBTOTAL:		\$2,062,500
Field Labor	In-house labor to support field work for project. Field Construction Contractor, Field Supervision, Pressure Regulation, LNG Ops, Field Ops, Project Management, Engineering support, In-house Environmental, Contracted Environmental, Legal	\$4,026,000
SUBTOTAL		\$6,088,500
Capital Burdens	24% Capital burden	\$1,461,240
AFUDC	Funds used during Construction	\$284,587
SUBTOTAL		\$7,834,327
Contingency - 30%		\$2,350,298
TOTAL PROJECT COST		\$10,184,625
Escalation 3.5%		\$356,462
SUBTOTAL		\$10,541,087
P50 Unidentified risk		\$2,108,217.40
Final Estimate		\$12,649,304

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DIV 4-3

Request:

Please provide the Company's assessment of the noise levels (in decibels) associated with full operation of:

- a. The Company's operation of the existing portable facility at Old Mill Lane;
- b. Operation of the purchased equipment for the proposed Old Mill Lane Project.

Response:

- a. A summary of the Company's assessment of the noise levels associated with the existing portable facility is found in Siting Report Sections 7.10 and 8.4.5. There are also reports prepared by the Company's noise consultant, HDR, Inc., which are found in Appendices E and F of the Siting Report. The report submitted as Appendix F details sound measurements recorded on January 11-12, 2022 of the existing facility using the older 650 thousand standard cubic feet per hour (MSCFH) vaporizer. The highest recorded measurements at the neighboring property line of the equipment in operation was 69.7 dBA.
- b. This winter the Company was able to rent a newer model vaporizer that was rated for 500 MSCFH. HDR, Inc. took noise measurements of the newer vaporizer on December 21, 2022. The newer vaporizer is similar to the model that the Company is proposing to purchase. A benefit of the newer equipment is that it is quieter than the older model that has operated at the site for the last 4 years. The noise estimates for the Project shown on Siting Figure 8-1 utilized the sound measurements from the 650 MSCFH vaporizer, so HDR prepared updated noise estimates for the Project based on the 500 MSCFH vaporizer. Attached hereto as Attachment DIV 4-3 is the updated contour map based on the new noise measurements with the following mitigation measures in place.
 - i) Kinetics Noise Control 2PSF industrial quilt is applied to the long sides and top of the vaporizer;
 - ii) 24ft tall (permanent) noise wall placed on the north side; and
 - iii) 20ft tall (temporary) noise walls placed on the east and west sides.



NOTES:

1. AERIAL IMAGE TAKEN FROM RIDEM GIS - RI MAPS & AERIAL PHOTOS AND NOT TO SCALE.
2. PROPERTY LINE LOCATIONS ARE APPROXIMATED BASED ON MUNICIPAL GIS WEBVIEWERS FROM CITY OF PORTSMOUTH, RI GIS AND CITY OF MIDDLETOWN, RI GIS, TOWN OF PORTSMOUTH PLAT MAPS, AND TOWN OF MIDDLETOWN PLAT MAPS.

LEGEND

LMAX (dBA)			
	<35		45-50
	35-40		50-55
	40-45		55-60
	60-65		65-70
	75-80		>80
	70-75		



PROJECT TITLE
AQUIDNECK ISLAND GAS RELIABILITY PROJECT

SHEET TITLE
NOISE CONTOUR MAP

SCALE
1" = 150'

PROJECT NUMBER
1032892

PROJECT MANAGER
ANKIT DHAR

DATE
03/28/2023

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DIV 4-4

Request:

Please provide supporting detail for the Company's assessment of the expected annual operating and maintenance costs for:

- a. The current rental vaporization equipment
- b. The proposed purchased vaporization equipment
- c. The current rental delivery trailers and storage equipment
- d. The proposed Smart Storage Queens

Response:

- a. The Company does not pay for any annual maintenance costs for rented equipment, including the rented vaporizers. Operational cost to use the equipment at the Project is covered by the labor services provided by the contractor. See Attachment DIV 3-1, OML Operating Expense that shows the combined cost for operating rented vaporizers and storage equipment. The previous contract did not break down labor operating cost by equipment type.
- b. The proposed purchased vaporization equipment is expected to have minimal costs for the expected useful life, but the Company does not have full details from the manufacture's operating and maintenance cost recommendations at this time. See Attachment DIV 4-4 for further details.
- c. The Company does not pay for any annual maintenance costs for rented equipment, including the rented storage equipment. The Company does not rent any delivery trailers and uses contracts for third party vendors to deliver LNG onsite. For storage equipment "Queens", operational cost to use this equipment at the Project is covered by the labor services provided by the contractor. See Attachment DIV 3-1, OML Operating Expense that shows the combined cost for operating rented vaporizers and storage equipment. The previous contract did not break down labor operating cost by equipment type.

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- d. The proposed purchased storage equipment is expected to have minimal costs for the expected useful life, but the Company does not have all details for the manufacture's operating and maintenance recommendations at this time. See Attachment DIV 4-4 for further details.

Estimated Company Owned Portable LNG Equipment Operating & Maintenance "O&M" Costs

Operating Cost					
Unit	Activity	Frequency	Cost	Annual Cost	Cost for all units
Vaporizer (2)	Winter Mobilization	Annual	\$2,000	\$2,000	\$4,000
Vaporizer (2)	Spring Demobilization	Annual	\$2,000	\$2,000	\$4,000
Annual Sum Total					\$8,000
Smart Queens (6)	Winter Mobilization	Annual	\$1,000	\$1,000	\$6,000
Smart Queens (6)	Spring Demobilization	Annual	\$1,000	\$1,000	\$6,000
Annual Sum Total					\$12,000
Annual Total					\$20,000
Note: Other operating expenses are expected to be minor and are covered in house by RI Energy personnel assigned to the Winter Operation.					

Maintenance Cost					
Unit	Activity	Frequency	Cost	Annual Cost	Cost for all units
Vaporizer (2)	Glycol Testing	Semi-Annual	\$250	\$500	\$1,000
Vaporizer (2)	Burner Tuning	Annual	\$1,500	\$1,500	\$3,000
Vaporizer (2)	Relief Valve Testing	Annual	\$1,000	\$1,000	\$2,000
Annual Sum Total					\$6,000
Smart Queens (6)	DOT Visual	Annual	\$325	\$325	\$1,950
Annual Sum Total					\$1,950
Smart Queens (6)	Pressure Test & RV Testing	Every 5 Years	\$5,000	-	\$30,000
Note: Additional maintenance items expected are minor in cost and complexity. These items will be covered in house by RI Energy personnel.					

Combined typical O&M Expense (less 5 year Queen Pressure Test)	\$27,950
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DIV 4-5

Request:

Please provide final pricing negotiated with Stabilis for contract support of the Old Mill Lane portable facility in Portsmouth for the winter of 2022-23 as well as any commitments made by the TNEC and Stabilis for pricing such contract support for the Portsmouth operations for future years.

Response:

Please see Attachment PUC 3-1 for the requested information regarding the 2022-23 rental and personnel costs for the operations at Old Mill Lane. The Company has not reached agreement with Stabilis for any future year.