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September 7, 2023

**VIA HAND DELIVERY & ELECTRONIC MAIL**

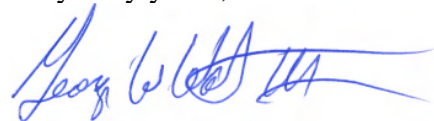
Emma Rodvien, Coordinator  
Energy Facility Siting Board  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: **SB-2021-04 – Petition for Third Waiver Extension  
The Narragansett Electric Company  
Aquidneck Island Gas Reliability Project  
Old Mill Lane, Portsmouth, RI**

Dear Ms. Rodvien:

I am enclosing for filing on behalf of The Narragansett Electric Company an original and seven (7) copies of its Petition for Third Waiver Extension to allow for the seasonal mobilization of LNG equipment while the Energy Facility Siting Board application for the Aquidneck Island Gas Reliability Project is being processed.

Very truly yours,



George W. Watson III

Enclosures

Copy to: Docket SB-2021-04 Service List (*by electronic mail*)

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

September 7, 2023

Date

**SB-2021-04 The Narragansett Electric Company's Application for a License to Mobilize and Operate a Liquefied Natural Gas (LNG) Vaporization Facility at Old Mill Lane (Portsmouth, RI)**

**Updated May 17, 2023**

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY  
FACILITY SITING BOARD

In re: The Narragansett Electric Company :  
(Aquidneck Island Gas Reliability Project : Docket No. SB-2021-04  
Old Mill Lane, Portsmouth, RI) :

Petition of The Narragansett Electric Company for Third Waiver Extension

Counsel:

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September 7, 2023

## **INTRODUCTION**

The Narragansett Electric Company (the “Company”) hereby petitions the Rhode Island Energy Facility Siting Board (“EFSB” or “Board”) to extend the waiver from the licensing requirement of the Energy Facility Siting Act (“Act”) previously granted by the Board on January 8, 2020, as extended by EFSB Order No. 150 dated August 26, 2021 and EFSB Order No. 158 dated October 4, 2022, for the seasonal operation of a portable liquefied natural gas (“LNG”) vaporization facility at Old Mill Lane, Portsmouth, Rhode Island (the “Property”) to provide standby peak-shaving and backup supply to the Aquidneck Island natural gas distribution system for the 2023-2024 winter (the “Project”). The Company is requesting a one-year extension of the existing waiver so that it may operate the Project while it completes the permitting for the Aquidneck Island Gas Reliability Project (“AIGRP”) which is the proposed long-term solution to Aquidneck Island’s natural gas capacity constraint and capacity vulnerability.<sup>1</sup>

In support of its request, the Company offers the following description of the Project together with a summary of the Property, the Project need, outreach, and purchase plan.

### **A. Property**

The Property is a five (5) acre parcel of which approximately 30,000 square feet will be used for the Project. The Property is owned in fee by the Company and is located on Old Mill Lane in Portsmouth adjacent to the gate station, which is the only connection between the Aquidneck Island natural gas distribution system and the interstate natural gas transmission

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<sup>1</sup> If the AIGRP is approved, the Company projects that a contractor would be hired in three to four months followed by approximately six months of construction.

system. The Property has been used for stand-by peak-shaving for Aquidneck Island the past four winters; for temporary backup during maintenance activities on the transmission pipeline in 2018, 2021, and 2022; and for emergency backup supply following an outage in 2019.

**B. Project Need**

The reliability need for the Project is described in detail in the Company's AIGRP Application to the EFSB which was submitted on April 1, 2022 and docketed on May 26, 2022. As noted in the AIGRP Application and in previous filings, the natural gas distribution system on Aquidneck Island is supplied by a lateral extension of the interstate natural gas pipeline which is known as the Algonquin G lateral. Aquidneck Island is at the end of the lateral which makes the natural gas supply to Aquidneck Island vulnerable to upstream supply constraints. In addition, in early 2019 the Company was made aware that the interstate pipeline operator may impose hourly supply limitations during the winter heating season. There is only one transmission system connection to Aquidneck Island, so any service interruption from a capacity vulnerability and/or capacity constraint on the transmission system may negatively impact the Company's ability to provide reliable service on Aquidneck Island. Since the winter of 2019-2020, the Project has been mobilized during winter months to address both the capacity vulnerability and capacity constraint. Ultimately, the Company proposes to replace the Project with the AIGRP, but that project is still in the permitting phase.

**C. Project Overview**

The Project will operate on the same schedule that it has for the last four winters. The Project will be mobilized in time to be online by December 1, and it will be in operation until March 31. The Project utilizes the following seasonal equipment: portable vaporizers, portable

booster pumps, portable storage tanks, portable generator, and a mobile office. Setup will occur over an approximately two-week period. Similar to last year, the Company will be using a more modern quieter vaporizer as the primary vaporizer, and the older vaporizer in use since 2019 is now the backup vaporizer. In addition to being quieter, while the system is operating in standby mode, the burner on the modern vaporizer only needs to be cycled every other day as opposed to several times a day to maintain the glycol bath temperature. In addition, the Company will continue to follow certain operational restrictions, whenever possible, to minimize sound and traffic impacts. The conditions are as follows:

- Mobilization/Demobilization: Conducted during business hours, 8 AM to 5 PM, Monday through Friday (“Business Hours”). Any work performed on Saturday and Sunday would be limited to quiet work (e.g. no machinery, power tools, or other noise emanating apparatuses). In the event the Company is unable to follow this schedule due to equipment delays or an emergency need for mobilization, the Company will contact local officials and abutters to provide notice of the need.
- Testing/Operating:
  - LNG deliveries limited to Business Hours.
  - Tank blowdowns and cooldowns will occur during Business Hours.
  - Burner on glycol vaporizer(s) will be turned off during the evening hours.

Note that weather and/or system demands may result in the Company having to work outside of the proposed conditions in order to maintain system reliability. Whenever possible, the Company will provide advanced notice to local officials and abutters that operations will extend into the evening hours.



The equipment will be removed once the Project is taken offline after March 31.

**E. Outreach**

The Company has maintained regular contact with the Towns of Portsmouth and Middletown and will continue its outreach and safety meetings with local officials throughout the period of the requested waiver extension. The Company will also maintain the Project website that includes contact information should the general public have any questions. Finally, prior to mobilizing the Project, the Company will notify town officials and the neighbors along Old Mill Lane of the scheduled work and provide the contact information for the Company's community outreach representative to address any questions.

**CONCLUSION**

**WHEREFORE**, the Company respectfully petitions the Board to grant a waiver of the licensing requirement for the Project to operate at the Property for the winter of 2023/2024.

THE NARRAGANSETT ELECTRIC  
COMPANY By its Attorney,



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