

EFSB 1-1

Request:

Regarding Quonset Development Corporation's position that the 115kV Gen-Tie line is not jurisdictional to the Board, please reconcile this position with SB-2021-01 and SB-2017-01:

- a. In SB-2-21-01, the Board did not have jurisdiction over a proposed wind farm located in federal waters, but exercised jurisdiction over (i) 23 miles of underwater transmission cables, and (ii) 1 mile of 275 kV transmission lines (connected to the underwater transmission cables) installed in a duct bank in the roads of the Business Park, the purpose of which was to interconnect the proposed non-jurisdictional wind farm to the existing transmission system; and
- b. In SB-2017-01, the Board exercised jurisdiction over a 6.8 mile 345 kV line that was needed to interconnect a proposed generation facility to the existing transmission system in Burrillville, which application was filed separately from an application for approval of the generation facility.

Response:

When the Quonset Development Corporation determined that it would pursue a decision that the 115kV Gen-Tie line is not jurisdictional to the Board, it did not review or consider the proceedings in Docket No. SB-2-21-01 or Docket No. SB-2017-01.

In further response to this data request, Quonset Development Corporation refers to the legal arguments of counsel provided in section IV of Quonset Development Corporation's Supplemental Memorandum in Support of its Petition for Declaratory Order.