

November 25, 2020

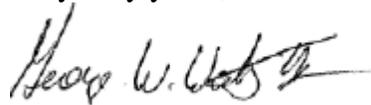
Kathleen Mignanelli
Siting Board Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Re: **In re: The Narragansett Electric Company d/b/a National Grid
Notice of Intent to Construct 115 kV Loop Lines of Less Than 1,000 Feet
(Wickford Junction Substation Loop Line)**

Dear Kathleen:

I am enclosing for filing an original and seven (7) copies of the Notice of Intent pursuant to Rule 445-RICR-00-00-1.6(c) of the EFSB Rules of Practice and Procedure on behalf of The Narragansett Electric Company d/b/a National Grid for the construction of 115 kV loop lines at the new Wickford Junction Substation in North Kingstown.

Very truly yours,



George W. Watson, III

Enclosure

Copy to: A. Ralph Mollis, North Kingstown Town Manager
Jeannette Alyward, North Kingstown Town Clerk
Matthew F. Callaghan, Jr., Esq., North Kingstown Town Solicitor
Mark Rielly, Esq.
David Waterfall, Esq.
Stacy M. Blundell

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD**

In re: THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID Notice of Intent to
Construct a Loop Line of Less Than 1,000 Feet
(Wickford Junction Substation Loop Line)

NOTICE OF INTENT TO CONSTRUCT

In accordance with Rule 1.6(C) of the Rhode Island Energy Facility Siting Board (“EFSB”) Rules of Practice and Procedure, The Narragansett Electric Company d/b/a National Grid (“TNEC” or the “Company”) hereby notifies the EFSB of TNEC’s intent to construct a 115 kV loop line¹ of no more than 200 feet in North Kingstown, Rhode Island (“Project”). The Project is required to connect the new Wickford Junction Substation (the “Substation”) that will be constructed at 1080 Ten Rod Road, North Kingstown, Rhode Island (the “Property”). TNEC is the fee owner of the Property, which hosts the existing Lafayette Substation (a distribution substation).² Presently, a 300-foot wide transmission line right of way (“ROW”) abuts the Property. Two transmission lines, including the L-190 115 kV Transmission Line (“L-190”), and one sub-transmission line are located in the ROW. The Substation will be located adjacent to the ROW, and the proposed 115 kV loop line will connect the Substation with the L-190, as depicted on the Site Plan for the Project which is attached as Exhibit A. The Substation is

¹ Substations are connected to the transmission lines via tap lines or loop lines. Tap lines directly connect to the transmission line without creating a break in the line. This is akin to a lateral connection. Looped lines occur where the transmission line is broken, and each segment of the line is rerouted directly in and out of the substation. Looped transmission lines allow for the circuit to be sectionalized on either side of a substation while taps do not.

² The Company intends to relocate the existing Lafayette Substation immediately adjacent to and within the fenceline of the new Wickford Junction Substation at a future date. Accordingly, the attached Site Plan reflects the location of the new Wickford Junction substation and the future Lafayette Substation.

necessary to support the interconnection of customer-owned distributed generation projects to the electric grid.

TNEC files this notice pursuant to EFSB Rule 1.6(C) regarding new power lines of less than 1,000 feet with a capacity of 69 kV or more. According to the EFSB's rules, the EFSB shall act upon this Notice, and any objection filed thereto, no later than forty-five days following the filing of this Notice. The Project does not constitute an "alteration" of a major energy facility because the length of the new loop line is less than 1,000 feet.³ See Rule 1.3(A)(4).

1. Identification of the Owner of the Facility

The owner of the relevant facilities is TNEC, a subsidiary of National Grid USA, Inc.⁴ TNEC's business address is 280 Melrose Street, Providence, Rhode Island 02907. The Project will be located on the TNEC-owned Property and within TNEC-held easements.

2. Detailed Description of the Proposed Loop Line

A. Length

The Project involves the construction of a new 115 kV loop line comprised of two supply lines, each no more than 200 feet in length, that will interconnect to the Substation. The loop line will connect the Substation to the existing L-190.

B. Route

In connection with the Project the Company will replace two existing wood structures with two steel three-pole deadend structures (#143 and #144) and install a third new steel three-

³ The loop lines are routed parallel to each other so it's the Company's practice to use the length of the loop line corridor as opposed to aggregate length of the line running in and out of the substation.

⁴ A chart identifying affiliates of the owner is attached hereto as Exhibit B.

pole deadend structure (#143A).⁵ New Structures #143 and #144 will be approximately 60 feet tall, and the other new structure (#143A) will be approximately 55 feet tall. The average L190 structure height around the Wickford Junction area is approximately 50 to 55 feet tall. The modest increase in height is necessary because the loop lines will travel slightly uphill to reach the Substation. The loop lines will terminate at substation deadend structures which are approximately 55 feet tall. Attached as Exhibit A is the Site Plan for the Project depicting the approximate location of the Project, the existing transmission and sub-transmission lines (including the L190 Line), and the Substation.

C. Function

The Project is needed to interconnect the Substation with the Company's existing L-190 Line and the 115 kV transmission system. The Substation is required to interconnect customer-owned solar photovoltaic distributed generation, which will connect to the substation via 34.5 kV lines, to the 115 kV transmission system. Customers have proposed to construct 14 large solar arrays totaling approximately 108 megawatts in capacity in the North Kingstown and Exeter areas, and will bear all costs associated with the Substation and Project.

3. The Project Does Not Constitute the Alteration of a Major Energy Facility

The Project does not constitute an "alteration" of a major energy facility because the proposed loop lines will be no more than 200 feet in length and the EFSB has expressly excluded power lines under 1,000 feet in length from the definition of "alteration" in Rule 1.3(A)(4):

"[t]he construction, modification or relocation of a power line of 69 kV or more which are less than 1,000 feet in length shall not be treated as an alteration...." As noted above, the Project

⁵ The Company also intends to replace one structure (#123) on the adjacent 34.5 kV 3311 sub-transmission line to make room for the Project. Since the 3311 line operates at less than 69 kV, it is not a "major energy facility" subject to the EFSB's siting jurisdiction.

work will occur entirely within TNEC property that is owned in fee or held by easement. TNEC's adjacent ROW is already occupied by two transmission lines and associated structures. In this sense, the Project is substantially similar to other TNEC projects in which the EFSB determined that new transmission lines less than 1,000 feet in length do not constitute alterations of a major energy facility. See, e.g., Docket SB 2013-1 (decision dated April 1, 2013); Docket SB-2013-02 (decision dated September 5, 2013); Docket SB 2015-01 (decision dated June 2, 2015); Docket SB 2015-02 (decision dated June 2, 2015); Docket SB 2015-5 (decision dated November 16, 2015); and Docket SB 2020-01 (decision dated October 1, 2020).

Moreover, TNEC believes that this Project will not result in any significant impact on the environment or the public health, safety and welfare, and therefore does not require further investigation or approval by the EFSB. The implementation of appropriate best management practices and mitigation measures during construction will avoid or minimize the construction phase impacts to the natural and social environment. In addition, the loop lines will be designed, constructed and operated consistent with applicable codes and requirements.

4. Additional Information

The Company obtained local zoning relief for the substation from the Town of North Kingstown Planning Commission and the Town of North Kingstown Zoning Board of Review. The local zoning relief required public hearings with mailed hearing notices to abutters within 200 feet of the substation parcel. In addition, the Rhode Island Department of Environmental Protection issued its RIDEM RIPDES Permit and Water Quality Cert on September 24, 2020.

CONCLUSION

For the reasons stated above, TNEC respectfully requests that the EFSB enter an Order pursuant to EFSB Rule 1.6(E) accepting this Notice of Intent to Construct the new 115 kV loop line and ruling that the Project may proceed without any further review by the EFSB.

THE NARRAGANSETT ELECTRIC COMPANY d/b/a
NATIONAL GRID

By its Attorney,

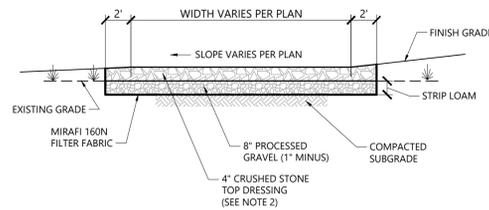


George W. Watson, III
Robinson & Cole LLP
One Financial Plaza, 14th Floor
Providence, RI 02903

EXHIBIT A

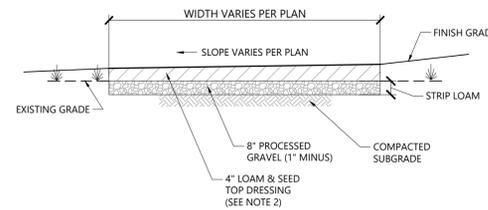


1 Cedar Street
Suite 400
Providence, RI 02903
401.272.8100



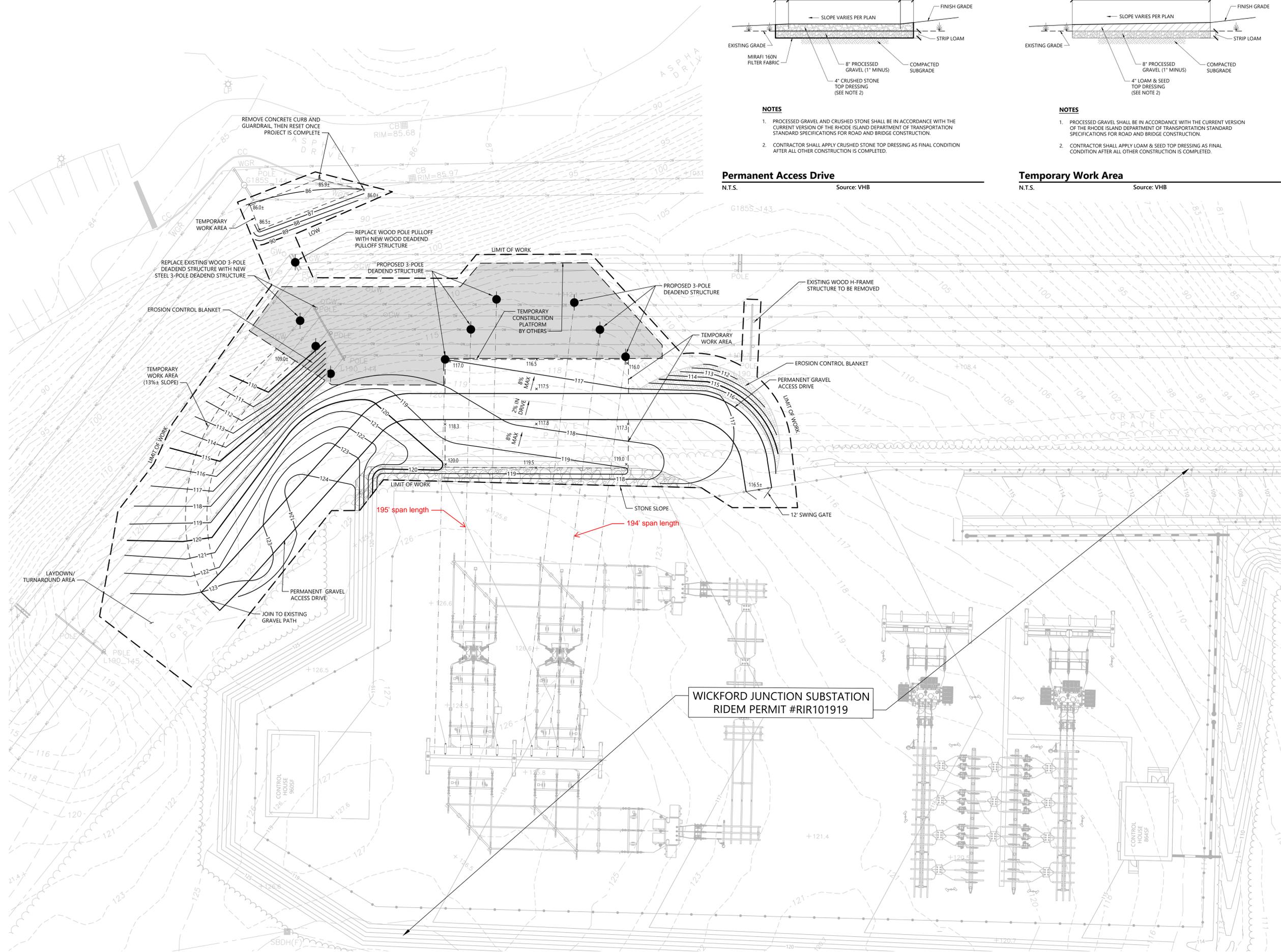
- NOTES**
1. PROCESSED GRAVEL AND CRUSHED STONE SHALL BE IN ACCORDANCE WITH THE CURRENT VERSION OF THE RHODE ISLAND DEPARTMENT OF TRANSPORTATION STANDARD SPECIFICATIONS FOR ROAD AND BRIDGE CONSTRUCTION.
 2. CONTRACTOR SHALL APPLY CRUSHED STONE TOP DRESSING AS FINAL CONDITION AFTER ALL OTHER CONSTRUCTION IS COMPLETED.

Permanent Access Drive
N.T.S. Source: VHB



- NOTES**
1. PROCESSED GRAVEL SHALL BE IN ACCORDANCE WITH THE CURRENT VERSION OF THE RHODE ISLAND DEPARTMENT OF TRANSPORTATION STANDARD SPECIFICATIONS FOR ROAD AND BRIDGE CONSTRUCTION.
 2. CONTRACTOR SHALL APPLY LOAM & SEED TOP DRESSING AS FINAL CONDITION AFTER ALL OTHER CONSTRUCTION IS COMPLETED.

Temporary Work Area
N.T.S. Source: VHB



Legend

- RIGHT-OF-WAY/PROPERTY LINE
- - - EASEMENT
- OVERHEAD WIRE
- - - LIMIT OF DISTURBANCE
- - - EDGE OF ACCESS DRIVE
- - - 4' MINOR CONTOUR
- - - 20' MAJOR CONTOUR
- 132.75 x SPOT ELEVATION
- UTILITY POLE

- NOTES:**
1. DISTURBED AREAS OUTSIDE OF THE PERMANENT GRAVEL ACCESS DRIVE SHALL BE RESTORED WITH 4" LOAM AND SEED WITH NEW ENGLAND CONSERVATION SEED MIX AFTER CONSTRUCTION IS COMPLETED.



Wickford Junction Substation
Addendum to Permit No. RIR101919
1080 Ten Rod road
North Kingstown, Rhode Island

No.	Revision	Date	Aspd.

Designed by: EOB
Checked by: _____
Issued for: _____
Date: _____
Permit Addendum **October 23, 2019**

Not Approved for Construction
Drawing Title: **Site Plan**
Drawing Number: _____

C-1A

Sheet 1 of 1

Project Number: 73001.10

EXHIBIT B

The Narragansett Electric Company – Structure Chart

