



## STATE OF RHODE ISLAND

### DIVISION OF PUBLIC UTILITIES & CARRIERS

Administration  
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October 21, 2021

In Re: Docket No. SB-2021-01

Dear Chairman Gerwatowski:

The Division of Public Utilities and Carriers (“Division”) is in receipt of your October 19, 2021 request for assistance in providing the Energy Facility Siting Board (“Board”) with a specialized engineering analysis in Docket No. SB-2021-01. Specifically, you have inquired whether the Division would assist the Board by providing a qualified expert witness to evaluate whether an alternative onshore cable route is reasonably available in order to bypass a residential neighborhood on Camp Avenue in North Kingstown, the route selected by the Applicant.

The Division is willing to assist the Board with respect to this request. However, the Division’s regularly-used electrical engineering expert, Gregory Booth, is currently engaged in other complicated consulting matters and is unable to take on additional work at this time. Mr. Booth has, however, indicated that one of his associates may be willing to accept this project, but the Division is concerned that the Board’s timing deadline for this work may pose a potential obstacle. Additionally, none of Mr. Booth’s associates would be willing to take on this work if such engagement requires travel to Rhode Island – all insist on remote participation.

Additionally, the Division would be willing to assist the Board, if the Division is accepted by the Board as a proper Intervenor in Docket No. SB-2021-01 for the limited purpose of providing the Board with an engineering analysis on the cable route issue. This analysis would be based on the evaluation provided by the Division’s expert witness and all other related evidence of record.

The Division expects that the necessary compensation for our electrical engineering expert will come through the Board’s funding mechanism under R.I Gen. Laws §42-98-17, which allows for the prebilling of such expenses to the Applicant in this docket. With such prebilling in place, the Board should be able to permit the Division to satisfy the monthly billing invoices received from the Division’s expert witness.

To sum up, before the Division can commit to assisting the Board, the Division needs confirmation that it will have a workable time horizon to complete the evaluation and that its expert witness will be able to participate in the entire process remotely. The Division believes that the evaluation in issue, depending

on its complexity, will likely take thirty (30) to sixty (60) days. If these terms are acceptable to the Board, the Division will file the necessary motion to intervene to facilitate the limited participation envisioned by the Board.

Respectfully,

A handwritten signature in blue ink that reads "Linda George". The signature is written in a cursive style with a long horizontal flourish at the end.

Linda D. George  
Administrator