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October 12, 2021

VIA E-MAIL AND HAND DELIVERY

Emma.Rodvien@puc.ri.gov

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

Re: Docket No. SB-2021-01 – In Re: Revolution Wind, LLC’s Application to Construct and Alter Major Energy Facilities in North Kingstown, Rhode Island

Dear Ms. Rodvien:

Enclosed please find an original and four copies of Revolution Wind, LLC’s (“Revolution Wind”) Supplemental Responses to the Energy Facility Siting Board’s First Set of Data Requests, EFSB 1-2, issued on September 23, 2021.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Adam M. Ramos'.

Adam M. Ramos

A handwritten signature in blue ink, appearing to read 'Robin L. Main'.

Robin L. Main

AMR:cw
Enclosures

cc: SB-2021-01 Service List (via e-mail)
Meredith Brady (via hand delivery)

SB-2021-01 Revolution Wind, LLC Application for Major Energy Facility**Updated August 27, 2021**

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EFSB 1-2

Request:

It appears from the photograph in Figure 5-3 that there is an access road of some type which leads to Parcel 179-005, which road begins at Camp Avenue at the point where the cable route turns left on Camp Avenue before heading north toward the National Grid substation.

- (a) Please provide a description of such access road, including ownership and its purpose.
- (b) Did the applicant consider using the access road to reach parcels 179-005, 179-030 & 179-001, instead of continuing into the residential area on Camp Avenue? If so, please explain why this alternative was not selected. If not considered, please explain why it was not considered.
- (c) Are there any reasons why the applicant would be prevented from using this access road as alternative means of accessing 179-005, 179-030 & 179-00, in order to avoid the residential area along Camp Avenue? If so, please explain.
- (d) If the EFSB were to require the applicant to use the access road to avoid the residential area, please explain all the practical impacts on the project.

Response:

- a. The access roadway that leads to The Narragansett Electric Company's ("TNEC") Davisville Substation is privately owned by two property owners:
 - 75 Circuit Drive, Keifer Park Associates LLC, Plat 179 Lot 017
 - 101 Circuit Drive, SPL Associates, Plat 179 Lot 019

TNEC has an easement over these private properties for the purpose of accessing the Davisville Substation and electric distribution facilities and serving its customers in this area.
- b. Yes, Revolution Wind, LLC ("Revolution Wind") initially considered using the access road for the siting of the onshore cable route during the initial design phase of the project, but removed it from consideration based on the process outlined below.

Siting of transmission lines considers a number of components that balance the developed and natural environment, reliability and cost. To determine the onshore cable route, Revolution Wind first factored in the desired Point of Interconnection to the New England transmission grid at the Davisville substation and the preferred sea-to-shore cable landfall location at the Goodison property. Revolution Wind next identified a location for the OnSS as close as possible to the Davisville Substation on property compatible with its use. The brownfield site offered by QDC is desirable because it minimizes the cable length (and corresponding impacts of the interconnection) and is a beneficial reuse of this historic dump site. The next phase of the analysis was the onshore cable route, including minimizing impacts during construction to the general public and adjacent property owners. Revolution Wind selected an underground transmission system, rather than overhead, to minimize aesthetic impacts and reduce electric and magnetic fields (“EMF”). By providing two adjacent underground electric transmission circuits, Revolution Wind has designed the cable configuration with what is called “optimum phasing” that uses the adjacent cables to cancel the magnetic fields of the overall system. This lowers the magnetic fields from the project. The use of shielded underground electrical cables reduces the electric fields to essentially zero. After selecting the underground system, the project identified every property owner type along the route and sought to minimize impacts for “sensitive uses” during construction. There are no sensitive uses along the route, including schools, daycares, hospitals, museums, fire departments, emergency medical/E911 centers, or police stations. Revolution Wind removed the one recreational area (Blue Beach and its associated parking lot) from consideration for the cable landfall location in response to constructive stakeholder feedback. The result is a route that balances multiple considerations, including what could be acquired from willing sellers, and that minimizes impacts to the environment, to the community, to businesses, and to residential property owners. It is a route that, as much as possible, uses existing, well-developed public rights of way in which utility infrastructure such as this is routinely installed as a reflection of the public interest in minimizing the need to develop new corridors through communities for such uses.

Eversource, as the joint owner of the project, serves millions of electric, gas distribution and water customers from underground facilities, and, in its experience, the preferred location for these facilities is the public roadway. Although we drive our vehicles along these roadways, they are essential for use by utilities to serve our customers in the least impactful manner. We believe the onshore cable route meets these criteria.

- c. & d. Revolution Wind determined that there were numerous issues regarding property rights, utility congestion and environmental concerns that justified excluding the access road

from further consideration. Specifically, Revolution Wind has identified a number of significant challenges if the project were to utilize the access road, as outlined below:

- The OnSS location, ICF Substation location and transmission cable system routing were the subject of numerous meetings with the principle landowner and regulatory body in that industrial park (QDC) and the transmission owner (TNEC) and a consensus as to the preferred routing and substation siting options based on available property that was both suitable for the use and met the technical interconnection and engineering needs of Revolution Wind. Revolution Wind also discussed project landfall and routing options with the Town of North Kingstown and the Town has indicated its acceptance of Revolution Wind's preferred substation location and transmission cable routing.
- In connection with one routing option that would have used, in part, the access road as another means of reaching Camp Avenue, Revolution Wind did attempt to acquire permanent and temporary easement rights from one of the private entities (The property owner of parcel 179-019), but that property owner rejected repeated attempts to negotiate an agreement. The primary discussions with this property owner centered on the alternative onshore cable route discussed in the Application, and not explicitly on use of the access road; however, Revolution Wind received the clear message that the property owner would not allow any use of this property. This was not the only refusal to negotiate that Revolution Wind encountered during the course of evaluating routing option alternatives, but serves to highlight the challenges projects often encounter when attempting to assemble a viable route outside established public and utility rights of way.
- TNEC has various existing infrastructure, including electric distribution and telecommunications facilities, along the access road. Revolution Wind would have to cross these facilities and maintain any required separation to avoid mutual thermal heating of the TNEC and Revolution Wind facilities. Revolution Wind considered this a limiting constraint in the engineering evaluation for use of this access road.
- The Revolution Wind OnSS, the ICF, the interconnecting cables between the two substations, and the reconfiguration of the overhead transmission facilities around the ICF and the Davisville Substation were carefully designed as a group through multiple iterations with an integrated approach to avoid and minimize environmental and other impacts and to maximize the amount of electrical equipment to be installed in the minimum amount of space. This included

intensive consultation with TNEC to ensure that development of the ICF and interconnecting cables (to be located on TNEC's property) did not interfere with TNEC's current and future use of its substation parcel. These iterations were performed to avoid direct impacts to on-site wetlands, avoid direct impacts to the vernal pools, avoid populations of sickle-leaved golden aster (a state species of special concern), and minimize impacts to the Native American cultural resources at the site. Assuming a redesign could be done in a manner that is consistent with TNEC's current and future use of the Davisville substation parcel, rerouting the export cable up the access road, through that parcel, and terminating at the Revolution Wind OnSS parcel (after which the interconnecting cables would have to be rerouted to the Davisville Substation and the ICF) would fundamentally transform the orientation of the entire Revolution Wind OnSS and ICF design. Such a rerouting would undo all the avoidance and minimization work performed to date, would require a complete redesign of the OnSS, ICF and reconfiguration of the overhead transmission structures, and likely would mean that some impacts could no longer be avoided or minimized.

The access road to the Revolution Wind OnSS on the preferred route also serves as the transmission cable corridor route and avoids the issues identified above to the greatest extent possible, while providing the desired roadway for installation and allows direct road access to the transmission cable system for the life of the project. The transmission cables also enter the Revolution Wind OnSS at the desired physical location that enables the entire substation equipment layout to be designed in a more optimal arrangement point and in a manner that avoids and minimizes resource impacts while at the same time enabling the optimal arrangement.

Supplemental Response:

This supplemental response provides further explanation for Revolution Wind's statements in its original response that the owner of parcel 179-019, which is also known as 101 Circuit Avenue ("101 Circuit"), "rejected repeated attempts to negotiate an agreement . . ." and that "Revolution Wind received the clear message that the property owner would not allow any use of this property. . . ."

The owner of 101 Circuit never explicitly said that they would not allow access. The Project attempted to negotiate access over a period of time. At the end of February 2020 and in early March 2020, the Project made three phone calls to the owner of 101 Circuit and left messages requesting return phone calls, but those calls were not returned. Additionally, a Project representative stopped by the owner's office to ask that they call back, but the owner did not do

so during that time frame. Later in 2020, the Project had further communications with the owner of 101 Circuit, but, at this point, the route through 135 Circuit was evolving as the preferred route. Given the lack of communication from the owner of 101 Circuit over a period of time, and the fact that the Project was pursuing access through 135 Circuit Drive, which is the preferred route and ultimately the proposed route, the Project ceased pursuing access through 101 Circuit. For clarity, the discussions with the owner of 101 Circuit did not have any bearing on the decision to rule out the use of the access road. As outlined in the initial response to this request, use of the access road for purposes of traversing the TNEC substation property was ruled out earlier in the process.

As discussed in the original response to data request EFSB 1-2(b), the Project removed use of that access road from consideration during the design phase for numerous reasons, including that TNEC has existing infrastructure in it, including electric distribution and telecommunications facilities, which Revolution Wind would have to cross while maintaining any required separation to avoid mutual thermal heating of the TNEC and Revolution Wind facilities – an issue the Project saw as a constraint in the engineering evaluation for use of this access road.