

STATE OF RHODE ISLAND ENERGY FACILITY SITING BOARD

Docket No. SB-2021-04 The Narragansett Electric Company d/b/a National Grid Application for a License to Mobilize and Operate a Liquefied Natural Gas (LNG) Vaporization Facility at Old Mill Lane (Portsmouth, RI)

THE TOWN OF MIDDLETOWN'S OBJECTION TO THE NARRAGANSETT ELECTRIC COMPANY'S PETITION FOR WAIVER

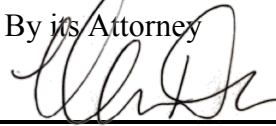
NOW COMES the Town of Middletown ("Town"), and by and through its undersigned counsel, hereby objects to the Narragansett Electric Company's ("National Grid") Petition for Waiver filed in the above-captioned proceeding. In support thereof, the Town avers the following.

National Grid's subject waiver extension states that the request is for the "[p]roject to operate at the [subject] [p]roperty for the winter of 2021-2022." However, the waiver request before the EFSB is lacking information on whether the request is subject to resurrection in the following years. Additionally, a review of the EFSB Rules of Practice and Procedure are silent on whether and how many waiver extensions are allowed.

As a result, the Town hereby requests a hearing to review this issue. Currently, the Town cannot formulate an opinion on whether the waiver extension is appropriate. The Town does anticipate, however, that National Grid will continue to seek waiver extensions for this project in the future. An opportunity is necessary for the Town to request conditions for any waiver extension approval contemplated by National Grid and the EFSB. Given the ambiguity of the situation and the Town's vested interest in ensuring the health and safety of its residents, conditioning any approval for waiver extension is appropriate.

WHEREFORE, based on the foregoing, the Town respectfully requests that the EFSB schedule a hearing for review.

Respectfully submitted,
Town of Middletown
By its Attorney



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CERTIFICATION

I hereby certify that I filed an original of the within Objection with the EFSB and sent a true copy, via electronic mail, to the parties listed on the distribution list for Docket SB-2021-04, on this 18th day of August, 2021.

/s/ Clarice Parsons