



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

Legal Section
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July 23, 2021

Via Electronic Mail

Emma Rodvien
Siting Board Coordinator
RI Energy Facility Siting Board
89 Jefferson Blvd.
Warwick, RI 02888

RE: SB-2021-04 The Narragansett Electric Company d/b/a National Grid Application for License to Mobilize and Operate a Liquefied Natural Gas (LNG) Vaporization Facility at Old Mill Lane (Portsmouth, RI)

Dear Ms. Rodvien:

On behalf of the Division of Public Utilities and Carriers ("Division"), please accept the attached Motion to Intervene in the above-referenced matter. The Division makes this filing within time as governed by Rule 1.10(D) of the Energy Facility Siting Board's ("EFSB") Rules of Practice and Procedure. In addition to consideration of this Motion, the Division respectfully requests leave to file additional support for this motion, likely to be filed hereinafter. The Division aims to supplement this filing straightaway, by end of day on Monday, July 26, 2021. Unforeseen administrative difficulties have resulted in the need for this request.

Thank you for your consideration of this request and I appreciate your attention to this filing.

Very truly yours,

A handwritten signature in blue ink that reads "Christy Hetherington".

Christy Hetherington, Esq.
Chief of Legal Services
Division of Public Utilities and Carriers

Enclosure, cc: Service List

BEFORE THE
STATE OF RHODE ISLAND
ENERGY FACILITY SITING BOARD

In Re: The Narragansett Electric Company d/b/a National
Grid Application for a License to Mobilize and Operate a
Liquefied Natural Gas Vaporization Facility at Old Mill Lane
(Portsmouth, RI)

Docket SB-2021-04

THE DIVISION OF PUBLIC UTILITIES AND CARRIERS'
MOTION TO INTERVENE

The Division of Public Utilities and Carriers (“DPUC”) hereby moves to intervene in Docket SB-2021-04 pursuant to the Energy Facility Siting Board (“EFSB”) Rules of Practice and Procedure, Rule 1.10(B).

The Division comes before the EFSB as a party uniquely situated and with particularized expertise and insight regarding the history and events that precipitated the facility at issue in this matter, namely, the liquified natural gas vaporization facility located on Old Mill Lane in Portsmouth, RI. The Division has dedicated time, resources and consideration of the events of the Aquidneck Island Gas Service Interruption that occurred on January 21, 2019 as evidenced by the detailed, seventy-three (73) summary report issued on October 30, 2019. The Division, tasked with ensuring affordable, reliable and safe utility service be provided to the Rhode Island citizenry, with the public interest and the ratepayer interest always in the forefront, is the regulatory body with the authority to oversee, monitor, and, when necessary, investigate, the gas distribution operations of National Grid. The Division’s participation in this Docket is wholly appropriate and necessary so that it may provide context and position relative to the public interests that are affected

by this LNG facility. The Division, which stands alone in this role, will provide regulatory perspective and expertise to these proceedings that no other party may provide.

Based on the reasons cited above, to be supplemented by additional support to be filed by the Division by end of day on Monday, July 26, 2021, the Division respectfully asks the Board to grant its Motion to Intervene.

Respectfully Submitted,

THE DIVISION OF PUBLIC UTILITIES
AND CARRIERS

By:



Christy Hetherington, Esq. (#6693)
Chief of Legal Services
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CERTIFICATE OF SERVICE

I certify that on July 23, 2021, the within Motion to Intervene was electronically served upon the parties on the service list (attached) for Docket SB-2021-04 and that the original and seven (7) hard copies were hand delivered to the Coordinator of the Energy Facility Siting Board at 89 Jefferson Boulevard, Warwick, RI, 02888.



SB-2021-04 The Narragansett Electric Company d/b/a National Grid Application for License to Mobilize and Operate a Liquefied Natural Gas (LNG) Vaporization Facility at Old Mill Lane (Portsmouth, RI)

Updated July 22, 2021

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