

**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
LNG Vaporization Facility at Old Mill Lane**

Docket No. SB-2021-04

The following comments are in response to the above-referenced Petition of National Grid: **Application for a License to Mobilize and Operate a LNG Vaporization Facility at Old Mill Lane (Portsmouth, RI)**.

I am a resident of Middletown RI and I am located within the evacuation/blast zone of the Old Mill Lane LNG storage facility. I have been employed in various facets of the energy industry for 35 years. I hold degrees in engineering and environmental law; I have extensive LNG experience in both marine and shore side operations and I am certified in marine LNG operations and LNG firefighting.

On 19 May 2021, National Grid filed an application to fully license a peak shaving LNG storage and vaporization facility in an empty lot located on a residential street in Portsmouth RI. In the same filing National Grid also seeks an extension of a previously granted/expired waiver.

National Grid's stated primary purpose for a waiver extension is so that it may operate the facility in the winter of 2021/2022 while it completes the EFSB licensing process for future operation of the facility. National Grid knows, or should know, that a license application for an LNG storage and vaporization facility located in a residential area will not be completed in a one-year time frame. As an example, in 2018 the Northeast Energy Center, a National Grid sponsored LNG facility in Massachusetts, began a licensing process that is presently ongoing. In the original 2019 waiver filing National Grid submitted the following assertions to the EFSB:

- a) "National Grid proclaimed that it had initiated a plan to resolve the alleged constraint issue within four winters." National Grid now seeks a license to make the LNG facility a permanent fixture in a residential neighborhood.
- b) "There was no need to obtain a new zoning certificate – there are no other local or federal permits required" Actually there are permits required: RIDEM Freshwater Wetlands Permit ;RIDEM Emergency Generator Permit; Portsmouth Zoning Board of Review Special Use Permit; Portsmouth Town Council, Noise Variance
- c) "Company intends to hold public outreach within one or two months of mobilizations." National Grid held no public outreach in 2019 despite numerous requests from residents as well as from state and local representatives.
- d) "Further noted that prior use of the property had elicited neither any interest or objection from abutters or the Town". National Grid's notification to resident abutters is dated the very same day that the Town of Portsmouth meeting was held, Middletown residents were not sent any notification of National Grids activity on Old Mill Lane. It is impossible for residents to object to what they do not know about.
- e) "In January 2019 National Grid experienced distribution outages caused by low transmission supply from its natural gas supplier." The investigative incident reports from the Federal and State agencies both indicate that the root cause of the natural gas outage originated and were exacerbated by National Grid's Providence LNG facility emergency shutdown.

National Grid is seeking to permanently install an ultra-hazardous activity in a residential setting under the guise of an ongoing “emergency” that does not exist. National Grid wants residents, municipalities and regulators to believe that the storage of 70,000 gallons of LNG (the energy equivalent of 1700 tons of TNT) is not an ultra-hazardous activity that significantly endangers their health, welfare and property. From inception National Grid has continuously demonstrated a cavalier attitude toward this project and complete disregard for the residents.

In November 2019 National Grid deployed LNG peak shaving/storage equipment in a residential area with no emergency plan; no evacuation plan; no properly trained first responders in Middletown or Portsmouth; no fixed firefighting or emergency stations and sloppy safety protocol at the gate of the facility. The Old Mill Lane site is indefensible from an emergency or from a foul play perspective. In the event of a fire emergency vehicles would have to stage activity on the roadway as they could not enter the site due to the cramped configuration. The only feasible approach would be to let the tanks burn out and keep the other tanks cool – difficult at best given the location and the proximity to homes and wetlands. The likelihood of a multiple tank failure or a BLEVE (Boiling Liquid Expanding Vapor Explosion) is significant if a fire should occur. When I have asked to review the emergency plans and evacuation plans I have been rebuffed. Apparently those of us in the evacuation/blast zone don’t need to know about the execution of the plan – if it in fact exists.

National Grid has not remotely demonstrated that they are a good corporate neighbor or caretaker of our community. Planting a few shrubs does not make an organization a good corporate citizen. National Grid has continuously exerted significant efforts to bypass all regulatory and safety oversight of the facility. National Grid has continuously failed to present an honest and thorough assessment of the “emergency”; potential dangers involved to the community and the environment and all viable alternatives. National Grid should not be allowed to proceed with further development or utilization of the ultra-hazardous LNG storage/vaporization facility on a lot located within a zoned residential neighborhood on Old Mill Lane.

The second topic to be discussed by the EFSB is the full license application for the Old Mill Lane LNG storage/vaporization facility submitted by National Grid. Rule 1.9(a) provides that the Board will “convene a preliminary hearing to determine the issues to be considered by the Board in evaluating [the] application, to designate those agencies which shall act at the direction of the Board for the purpose of rendering advisory opinions, and to identify those licenses required by the facility which are under the direct control of DEM and CRMC.”

The State of Rhode Island has no codified procedure for the licensing of an LNG storage /vaporization facility. However, the State of Massachusetts has 980 CMR 10.00: Siting of Intrastate Liquefied Natural Gas Storage. 980 CMR 10.00 includes performance standards for thermal radiation and flammable vapor dispersion in the event of specified design accidents which define acceptable site size, radiation, and environmental impact. This document may provide the EFSB a roadmap for some review standards that could be utilized in analyzing National Grid’s license application.

At this juncture Rhode Island should bid farewell to National Grid and hope that PPL is a better caretaker for our communities.

Respectfully submitted

Peter J Horvath
Middletown RI