

Date August 23, 2021

To: RI Energy Facility Siting Board (EFSB)

From: Stephen and Lori MacDonald

Subject: EFSB Docket 2021-04

References: 1. SB Order 147 Docket SB 2020-02

2. EFSB Project Siting Report Portable LNG Vaporization Project

First of all, we would like to thank the Rhode Island Energy Facility Siting Board (EFSB) decision in Docket SB 2020-02 for recognizing the National Grid LNG/piping station located at Old Mill Lane, Portsmouth is in fact a "major energy facility" (Ref. 1) and issuing SB Order 147 which required that "National Grid shall file an application to construct a major energy facility with the Board no later than June 1, 2021." (Ref.1)

We would also like to thank those nonprofit organizations and state agencies for filing briefs with the EFSB recognizing there are major issues concerning this site well beyond the needs of the immediate residential neighborhood.

We would like to express our opposition to the National Grid proposal to maintain the Old Mill Lane LNG station in the manner that it did during the 2019-20 and 2020-21 heating seasons. Below are our comments regarding our experiences and concerns related to the National Grid operations at Old Mill Lane Portsmouth RI.

EXPERIENCES

We have lived at 124 Old Mill Lane Portsmouth RI since October 1992. Because the gas transfer station was directly across the street, prior to buying the newly constructed house, we spoke with representatives of the old Providence Gas Company about the future plans at the site at 135 Old Mill Lane. We were told over the course of the next few years the piping system would be upgraded which would reduce the noise level when gas was flowing at high demand times. We were told the several tanks that were at the site were obsolete and would eventual be removed and not replaced. We then decided to purchase the house. The former gas company over the next few years made those improvements; and since that time the piping system has not been excessively noisy during peak operations. Additionally, the former owners insured the site was maintained, landscaped and blended in nicely with the residential area. We considered the former operators of the Old Mill Lane Portsmouth RI site a good corporate neighbor.

Sometime in the 2000s, we are not sure of the actual date, National Grid became the natural gas provider on Aquidneck Island and took over operations at Old Mill Lane Portsmouth RI. Although they are adequate neighbors National Grid does not put the kind of attention to the upkeep of the property that the previous operator did and as a result the site is quite frankly an eye sore and does not blend in with the residential area. If this facility was in a major National Grid stockholder's or executive's neighborhood, we are sure the facility would have a nicer appearance.

In January of 2019, National Grid experienced a gas outage on Aquidneck Island which resulted in the loss of gas to many of its customers. As a result of this outage National Grid was given an operational

waiver by RI EFSB to operate a portable LNG operation through the winter of the 2020/2021 heating season at the Old Mill Lane site.

CONCERNS

For the past three winters LNG operations have had an adverse effect on the surrounding residential area. We have two primary concerns that need to be resolved.

1. The NOISE issue must be corrected. Make no mistake about it, the operational noise projected from this site is unacceptable for a residential area. Normal operations at this site produce very loud noises at many times of the day. When the LNG was heated up for expansion the generated noise was extremely loud and could be heard thru out our house. This occurred during the morning, evening and overnight time frames. Additionally, during the month of November 2020, National Grid made preparations to the site. The tanks, diesel generators and associated equipment were placed very near the street (northern boundary); during a prior verbal discussion we had with a National Grid representative, we had recommended that the equipment be placed nearer the southern boundary (site of the original Providence Gas Building) with a noise barrier built in a manner to reduce the noise projecting into the residential area. This was not done. During the heating season of 2020-2021 we complained several times to the EFSB, Portsmouth authorities and to Mr. Jacques R. Afonso, the National Grid RI Manager of Community & Customer Management. On 1/21/21 we spoke with Jacques and the on-site supervisor Nicholas about the issues. They said they would try not to operate during the evening and would attempt to throttle down the vent off gas. Unfortunately, they were unsuccessful and during the next few weeks several times we were awoken after 11pm due to the required operations.
2. NOISE is discussed several times in my Reference 2, EFSB Project Siting Report Portable LNG Vaporization Project, which was submitted by National Grid. Page 66 says 'Noise is defined as unwanted or excessive sound'. That paragraph continues to describe several terms such as loudness, dB(A) sound levels and human perceptions of acoustic energy. Page 67 is a table which gives examples of the various Sound pressure levels, subjective Evaluation and examples in the Environment. In accordance with that table a Subjective Evaluation of 'LOUD' is 70 dBA. Page 68 states the following "The State of Rhode Island does not have regulations that set community noise exposure criteria or abatement measurements. Instead, noise abatement criteria are instituted by the municipalities of Rhode Island. The project is located in Portsmouth, but the property is also on the town line with Middletown. Both towns have developed noise impact criteria as follows:" Both the towns of Portsmouth and Middletown Sound limits, dB(A) for residential and open space is as follows 7am to 10pm; 65 dB(A), 10pm to 7am; 55dB(A). Page 77 states the following: "The noise analysis calculated the potential sound levels at the Project assuming full operation of the equipment necessary to vaporize. The sound levels

generated by the equipment range from 65 dB(A) to 97 dB(A). These sound levels exceed the Portsmouth's and Middletown's sound limit of 55 dB(A) for the residential zoned areas during the nighttime period and are therefore not in compliance with their noise ordinances". Page 85 discusses possible Noise mitigation measures; unfortunately, there is nothing there that would lead us to believe that the NOISE issues that we discussed in paragraph 1 would be permanently corrected. Past experiences indicate differently; On Sunday, November 29, 2020 National Grid tested their equipment at Old Mill Lane Portsmouth RI. The testing was continuous from 2 to 3:10 p.m. and intermittent at other times during the day. National Grid had indicated that testing would be done only during normal business hours Monday-Friday.

3. Page 88 states "Section 257-7 of the Code of the Town Portsmouth provides the maximum permissible sound levels by receiving land uses. A sound variance from the Portsmouth Town Council will be required for the operation of the Project." That statement alone indicates to us that National Grid intentions are to bully the Town of Portsmouth into providing a local municipal sound variance and avoid state oversight. Based on our experience, National Grid has absolutely no intention to put in the required design effort, equipment modification, or building requirements to make this project fit into the residential area that the LNG station is located.
4. The next issue we want to discuss is the safety of the neighborhood streets. Page 77 of Ref 2 states the following; "If the facility remains operational at maximum peak load for a 24-hour period, then approximately 17 LGN tanker trucks would be needed to refill the storage tanks". At the site 5 LGN tanks are ready for immediate use. This means if 24-hour peak loading is required, during that 24-hour period, at least 12 very large truck LNG trailers would be required to travel the narrow streets during the dead of winter, with snow and ice likely on the road. This LNG truck/trailer combination is very large and will travel thru residential neighborhoods on narrow streets with limited sidewalks, no real shoulders and depending on the time day, frequent school bus stops. This is a recipe for a tragic accident: It does not belong in this neighborhood.

On 10/14/20 National Grid had a remote Open House for Aquidneck Island Energy Matters to discuss National Grid's 2020 Aquidneck Island Long Term Gas Capacity Study which states that the LNG site is in the vicinity of a residential neighborhood; that is an inaccurate statement, it is actually in the neighborhood. Additionally, they discussed short- and long-term solutions for Aquidneck Island gas needs. During their presentation, it became apparent to us that for cost considerations National Grid would support continuing the LNG facility at Old Mill Lane Portsmouth until 2034. After reviewing the Energy Facility Siting Board Siting Project Report, Portable LNG Vaporization Project, it is acutely apparent that National Grid has absolutely no intentions of stopping the use of the Old Mill Lane facility for LNG vaporization. Rather they will use every legal means to draw this process out and simultaneously expand operations on the island. For those of us who live in the area this is unacceptable. We strongly urge the Rhode Island Energy Facility Siting Board at a minimum to require National Grid to truly intensify their

noise abatement procedures and equipment/building requirements for the heating season 2021/2022 and not approve LNG operations pass the 2022/2023 heating season.

Thank you for allowing us express our concerns regarding the National Grid Old Mill Lane Portsmouth RI operations.

Very Respectfully,

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