

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :
d/b/a National Grid : Docket No. SB-
(Old Mill Lane Vaporization, Portsmouth) :

Petition for Waiver
The Narragansett Electric Company
d/b/a National Grid

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INTRODUCTION

The Narragansett Electric Company d/b/a National Grid (the “Company”) hereby petitions the Rhode Island Energy Facility Siting Board (“Board”) for a waiver from the licensing requirement of the Energy Facility Siting Act (“Act”) to operate a temporary portable liquefied natural gas (“LNG”) vaporization facility at Old Mill Lane, Portsmouth, Rhode Island (the “Property”) to provide emergency backup natural gas supply to Aquidneck Island (the “Project”). The Company believes a waiver is appropriate because the Project (i) is temporary, and (ii) will only be mobilized when it is required to backup the natural gas supply to Aquidneck Island.

In support of its request the Company offers the following description of the Project together with a summary of the Property, the Project need, permits required, and outreach.

A. Property

The Property is a five (5) acre parcel of which approximately 3,000 square feet will be fenced and used for the Project. The Company selected the Property because it is (i) located near the connection between the Aquidneck Island distribution system and interstate transmission system and (ii) owned in fee by the Company. The Property is the former propane tank site that supplied the Aquidneck Island distribution system. The propane tanks were removed from the site in 2014 and the site was vacant until last year.

A temporary vaporization facility was first used on the Property last May-June 2018, as an emergency backup to the distribution system during the scheduled inspection of the interstate transmission pipeline. The facility was needed as backup in case the inspection process impacted the natural gas supply to the island. In early summer 2018, after the inspection was completed, the equipment was removed, the Property was restored, and the site was left vacant

until January 2019. In January, the temporary vaporization facility was installed to supply the island following distribution outages caused by low transmission supply from the Company's natural gas supplier.

Prior to 2018, National Grid used a site within the Newport naval base when a temporary portable vaporization facility was needed to backup the natural gas supply to the island. However, the naval base is an active military facility, therefore, access is not guaranteed. Due to the challenges of operating an emergency facility at the naval base, Old Mill Lane was identified as the preferred location because it is owned by the Company. The other benefit of using this Property is that it is located near the connection to the transmission system supply line.

B. Project Need

The Company was recently informed of certain transmission system constraints during the next four winters. Any service interruption and/or supply constraint on the transmission system may negatively impact the Company's ability to provide reliable service if gas demand exceeds supply. Thus, there is a need for the Company to maintain the ability to mobilize a Project at the site in response to emergency situations and to serve as a backup to the natural gas supply during scheduled transmission line inspections and repairs.

Presently, the Company is preparing to operate the Project during the winter for the next four years in response to expected supply constraints on the interstate transmission system. The proposed winter use is temporary because (i) the equipment will only be present during the winter and (ii) the Company has initiated a plan to contract for gas supply which is expected to resolve the gas supply constraint issue within five years.

C. Project Description

The Project is designed to feed the Aquidneck Island distribution system in the event the transmission supply is constrained. If necessary, the Project has the capability to supply the entire Aquidneck Island natural gas distribution system from this location. The equipment required to do this includes one portable vaporizer, two ambient vaporizers, and five on-site portable storage tanks.¹

As it has in the past, the Company will secure the Project site using fencing and personnel. The Project site is enclosed by the existing permanent fence and gate along Old Mill Lane and temporary fence around the perimeter of the Project. The permanent and temporary chain link fences are eight (8) feet tall. Once the equipment is on site, a security guard will be present at all times. Once the Project is operational there will be at least one National Grid employee present and one representative of Prometheus (the owner of the vaporization equipment) present at the Project at all times.

In response to the anticipated winter supply constraints, the Project will operate during the winter season from December 1st to March 31st. The site will be mobilized in November so that it is operational in December. Setup begins with clearing of vegetation, installing composite mats that provide a stable work surface, and installing the temporary fence around the perimeter of the Project. Once the initial setup is completed, the portable equipment is delivered, together with an office trailer, and portable lavatory. When the Project is not in operation (April through November), all of the equipment and temporary fencing are removed from the Property, the area is reseeded, and the site is allowed to return to a natural state.

¹ The portable facilities operated in June 2018 and winter 2019 required three generators to operate. Although there were no noise complaints in 2018 and 2019, a benefit of the new equipment is that it is expected to be quieter as only one generator is required.

The mobilization and restoration process are the same for responses to emergency situations such as providing backup supply during transmission line pipe inspections and/or repairs.

E. Permits

The Company reviewed the proposed use of the Property with the Town of Portsmouth in advance of the summer 2018 mobilization. In connection with that consultation, the Company applied for and received a zoning certificate for the proposed facility. After recent consultation with the Company on the continued seasonal use of the Property to support the Project, the Town of Portsmouth informed the Company that there was no need to obtain a new zoning certificate. In addition, there are no other local or federal permits required for the Project.

F. Outreach

As noted above, the Company has been in contact with the Town of Portsmouth to review the location of the Project as well as the operation and maintenance of the Project when it is in service. Project team members are scheduled to attend the Portsmouth Town Council hearing on October 28th to review the Project with the Council and interested residents. To the extent possible, the Company will schedule public outreach 1-2 months in advance of future site mobilizations.

CONCLUSION

WHEREFORE, the Company respectfully petitions the Board to grant a waiver of the licensing requirement for the Project. As described above, the equipment and operation of the Project are temporary and only needed to respond to and prevent emergency situations that would result from the loss of gas supply. Further, while the Project will be needed on a

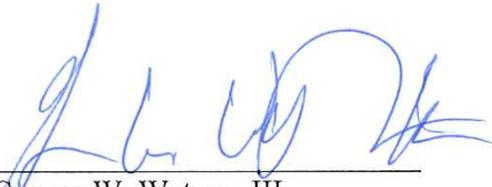
reoccurring basis for the next four years, it will be doing so as a temporary solution to avoid any loss of gas supply to Aquidneck Island during the winter.

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d/b/a NATIONAL GRID

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