

**Via Hand Delivery**

November 1, 2019

Kathleen Mignanelli, Coordinator  
Energy Facility Siting Board  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: The Narragansett Electric Company d/b/a National Grid  
Q-143 and R-144 115 kV Underground  
Transmission Line Reconductoring Project  
Providence, Rhode Island**

Dear Kathleen:

I am enclosing for filing on behalf of The Narragansett Electric Company d/b/a National Grid (“TNEC”) an original and seven (7) copies of an Application pursuant to Rule 1.6(F) of the Energy Facility Siting Board’s Rules of Practice and Procedure for the reconductoring of an existing major energy facility as described in the Application.

The Application includes an Environmental Report dated October 2019 which includes Figures and Current Status of Research on Extremely Low Frequency Electric and Magnetic Fields and Health – February 22, 2019.

Also enclosed are two (2) thumb drives with electronic copies of the Application and Environmental Report. If you need additional copies of the above, please advise and we will provide them.

# Robinson+Cole

Kathleen Mignanelli, Coordinator  
November 1, 2019  
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Please acknowledge receipt of this filing by date stamping the enclosed copy of this letter.

Sincerely,



George W. Watson, III

Enclosures

Copy to: Shawn Selleck, Providence City Clerk (*via hand delivery*)  
Jeffrey Dana, Esq., Providence City Solicitor (*via hand delivery*)  
Marisa L. Pizzi, Esq., Senior Counsel, National Grid

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :  
d/b/a National Grid :  
(Q-143 and R-144 115 kV Underground : Docket No. SB-  
Cable Reconductoring Project) :

Notice of Intent Application of  
The Narragansett Electric Company  
d/b/a National Grid

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October 31, 2019

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## INTRODUCTION

The Narragansett Electric Company d/b/a National Grid (“TNEC”), with a principal place of business at 280 Melrose Street, Providence, Rhode Island 02907, hereby submits this Notice of Intent Application to the Energy Facility Siting Board (the “Board” or “EFSB”) for approval of the reconductoring<sup>1</sup> of existing transmission lines within the State of Rhode Island, pursuant to the applicable provisions of Rhode Island General Laws §§ 42-98-1, et seq. and the Board’s Rules of Practice and Procedure, as amended (the “EFSB Rules”).

This Application is filed by TNEC pursuant to § 1.6(F) of the EFSB Rules which provides an abbreviated review for (i) the construction of power lines of more than 1,000 feet but less than 6,000 feet or (ii) the modification or relocation of power lines. Rule 1.3(A)(4) states that, “‘modification’ includes reconductoring and rebuilding an existing power line.” Rule 1.6 provides for an abbreviated application, a public hearing “in one or more of the cities or towns affected by [the] application,” and a determination within sixty (60) days of the filing as to “whether the project may result in a significant impact on the environment or the public health, safety and welfare,” thereby requiring a full EFSB review. (See EFSB Rules 1.6(F), (G), and (H)). If the Board does not determine that the project may result in a significant impact on the environment or the public health, safety and welfare, the project does not constitute an “alteration” and the project may proceed without further review. (See EFSB Rules 1.3(A)(4) and 1.6(F)).

TNEC is proposing to reconductor the existing underground 115 kilovolt (kV) Q-143 and R-144 Lines (the “Q-143 and R-144 Lines” or “Lines”) within the existing approximately two mile route from the Admiral Street Cable Terminal to Manhole 31 on Dollar Street in

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<sup>1</sup> “Reconductoring” is the replacement of the conductors (wires) of an existing transmission line with new, larger conductors which are capable of carrying more power. For underground transmission cables, reconductoring may also involve the replacement or reinforcement of existing manholes and duct bank.

Providence, Rhode Island. In this Application, TNEC requests the Board's approval of the reconductoring of the Lines (the "Project").

TNEC is filing herewith and incorporates herein a Project Siting Report entitled "Q-143 and R-144 115 kV Underground Cable Reconductoring Project" (the "Siting Report"). This application follows the organization of § 1.6(F) of the EFSB Rules and identifies the sections of the Siting Report where the issues identified in the EFSB Rules are discussed.

1. Identification of the owner(s) of the facility.<sup>2</sup>

a. The owner of the facility is The Narragansett Electric Company, a Rhode Island chartered public utility, with its principal place of business at:

280 Melrose Street  
Providence, RI 02907

b. The affiliates of The Narragansett Electric Company include its parent, National Grid USA and the National Grid (US) Holdings Ltd companies. The corporate relationships among the National Grid (US) Holdings Ltd companies are shown on Exhibit 1, attached. A listing of non-US affiliates is available upon request.

2. Detailed description of the proposed facility.<sup>3</sup>

The Q-143 and R-144 Lines each consist of three single phase self-contained fluid-filled cables. The Lines share 2.3 miles of common duct bank primarily consisting of concrete encased four-inch fiber conduits with separate manholes for each Line.<sup>4</sup> The route of the Lines is described in detail in Section 3.3.1 of the Siting Report and shown in the Project Route Map Book Index, Figure 1, Pages 1-7 of the Siting Report.

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<sup>2</sup> EFSB Rule 1.6(F)(1) requires the applicant to provide identification of the owner(s) of the facility, including identification of all affiliates of the proposed owners, as such term is defined in R.I.G.L. §39-3-27.

<sup>3</sup> EFSB Rule 1.6(F)(2) requires the applicant to provide a detailed description of the proposed facility, including its length, route, function and operating characteristics, and complete plans as to all structures associated with the proposed facilities.

<sup>4</sup> A side profile of the proposed duct bank can be found in Figure 3 of the Siting Report.

The following work is proposed: (1) remove existing cable and accessories, and re-use existing duct bank; (2) install short sections of new duct bank to bridge the existing duct bank sections through or around the existing manholes at 22 manhole pairs; (3) remove and replace six manhole pairs for splicing the power cables; (4) install two new manhole pairs at new locations along the existing duct bank alignment; (5) realign short sections of duct bank between new manholes and existing duct bank, as necessary; (6) rebuild remaining original portion of Manhole 31 on Dollar Street; (7) replace or repair existing ducts as needed after proofing of each conduit; (8) install six 115 kV 1,500 kcmil copper conductor solid dielectric insulated cables in the existing/modified duct bank; (9) install two new ground continuity conductors (500 kcmil copper, 600 Volt insulated) in the existing/modified duct bank; (10) install three 115 kV splices in each splicing manhole; (11) install cable riser structures, three outdoor cable terminations and three surge arresters per Line within the Admiral Street Cable Terminal; and (12) install one fiber optic cable from Admiral Street Cable Terminal to Franklin Square Substation.

3. Detailed description and analysis of the impact of the Project on the physical and social environment.<sup>5</sup>

The environmental characteristics of the Project area are described in Section 5.0 of the Siting Report and the affected social environment is discussed in Section 6.0. The impact of the Project on the natural and social environments is described in Section 7.0 of the Siting Report. A review of current health research pertaining to electric and magnetic fields is contained in Appendix A of the Siting Report. The existing and projected levels of electric and magnetic fields at the edges of the ROW are provided in §§ 6.7 and 7.13 of the Siting Report. The Project

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<sup>5</sup> EFSB Rule 1.6(F)(3) requires the applicant to provide a “[d]etailed description and analysis of the impact of the Project on the physical and social environment. The applicant shall also provide a review of the current independent scientific research pertaining to electromagnetic fields (“EMF”) and shall provide data on the anticipated levels of EMF exposure and potential health risks associated with this exposure. To the extent the proposed Project will have only negligible impact on any particular resource in the natural and social environment the applicant may so state and need not provide a detailed analysis of the baseline conditions for that resource.”

is not anticipated to have any long-term impacts to the natural or social environment of the Study Area. Mitigation measures for this Project will be used to reduce the impacts related to construction work and are described in Section 8.0 of the Siting Report.

4. All studies and forecasts which demonstrate the need for the proposed facility.<sup>6</sup>

The need for the Project is described in Section 2 of the Siting Report.

5. The reasons that the Project does not constitute the alteration of a major energy facility.

Transmission lines of 69 kV and above are included in the definition of “major energy facility” in Rule 1.3(A)(16) of the EFSB Rules. However, Rule 1.3(A)(4) states that

the modification or relocation of an existing power line shall not be an alteration unless the Board determines that the project may result in a significant impact on the environment or the public health, safety and welfare. (Emphasis added.)

Thus, the Project would constitute the alteration of a major energy facility and be subject to the full EFSB permitting process only if the Board determines that it “may result in a significant impact on the environment or the public health, safety and welfare.”

As explained in Section 3 of the Siting Report, the Project involves reconductoring the existing underground Q-143 and R-144 Lines within the existing approximately two mile route from the Admiral Street Cable Terminal to Manhole 31 on Dollar Street in Providence. As summarized in the Siting Report, any impact to environmental resources and the social environment will be negligible. Consequently, because the Project does not significantly impact the environment or the public health, safety and welfare, the Board should determine that the Project does not constitute an alteration and is not subject to the full EFSB permitting process.

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<sup>6</sup> EFSB Rule 1.6(F)(4) requires the applicant to provide “[a]ll studies and forecasts which demonstrate the need for the proposed facility under the statewide master construction plan submitted annually.”



CONCLUSION

This Application, the Siting Report which is filed herewith and incorporated herein, and the other supporting material clearly demonstrate that the proposed reconductoring of the existing underground Q-143 and R-144 115 kV Transmission Lines will not result in a significant impact on the environment or the public health, safety and welfare.

For the reasons stated herein, The Narragansett Electric Company d/b/a National Grid requests that the Energy Facility Siting Board approve the Project as described herein pursuant to EFSB Rule 1.6(F).

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID

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**The Narragansett Electric Company**

**Structure Chart**

