



100 Westminster Street, Suite 1500
Providence, RI 02903-2319

p: 401-274-2000 f: 401-277-9600
hinckleyallen.com

Adam M. Ramos

aramos@hinckleyallen.com
Direct Dial: 401-457-5164

October 29, 2021

VIA E-MAIL AND HAND DELIVERY

Emma.Rodvien@puc.ri.gov

Emma Rodvien, Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket No. SB-2021-01 – In Re: Revolution Wind, LLC’s Application to Construct and Alter Major Energy Facilities in North Kingstown, Rhode Island

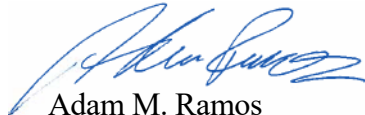
Dear Ms. Rodvien:

Enclosed please find an original and four copies of Revolution Wind, LLC’s (“Revolution Wind”) replacement Responses to the Energy Facility Siting Board’s Fourth Set of Data Requests, issued on October 15, 2021.

On October 21, 2021, the EFSB granted an extension to October 29, 2021, for Revolution Wind to respond to these requests. This filing contains Revolution Wind’s complete response to the Fourth Set of Data Requests.

Thank you for your attention to this matter.

Very truly yours,



Adam M. Ramos



Robin L. Main

AMR:cw
Enclosures

cc: SB-2021-01 Service List (via e-mail)
Meredith Brady (via hand delivery)

SB-2021-01 Revolution Wind, LLC Application for Major Energy Facility**Updated October 25, 2021**

Name/Address	E-mail
Chairman Ronald Gerwatowski (PUC)	Ronald.Gerwatowski@puc.ri.gov ;
Acting Director Terry Gray (DEM)	terry.gray@dem.ri.gov ;
Associate Director Meredith Brady (DOA)	Meredith.brady@doa.ri.gov ;
Emma Rodvien (PUC)	Emma.Rodvien@puc.ri.gov ;
Patricia Lucarelli (PUC)	Patricia.lucarelli@puc.ri.gov ;
Suzanne Amerault (DEM)	Suzanne.Amerault@dem.ri.gov ;
Maria Mignanelli (DOA)	maria.mignanelli@doa.ri.gov ;
Adam Ramos (Hinckley, Allen, & Snyder, LLP)	aramos@hinckleyallen.com ;
Robin Main (Hinckley, Allen, & Snyder, LLP)	rmain@hinckleyallen.com ;
Christine Dieter (Hinckley, Allen, & Snyder, LLP)	cdieter@hinckleyallen.com ;
Marvin Bellis (Eversource)	marvin.bellis@eversource.com ;
Charles R. Scott	chsco@orsted.com ;
Jeannette Alyward	jalyward@northkingstown.org ;
Town of North Kingstown Town Council	TownCouncil@northkingstown.org ;
Matt Callaghan	matt@callaghanlawri.com ;
George Watson (Robinson Cole)	Gwatson@rc.com ;
Mark Rielly (National Grid)	Mark.rielly@nationalgrid.com ;
Rachel Thomas (National Grid)	Rachel.Thomas@nationalgrid.com ;
Commissioner Nicholas Ucci (OER)	Nicholas.Ucci@energy.ri.gov ;
Christopher Kearns (OER)	Christopher.Kearns@energy.ri.gov ;
Carrie Gill (OER)	Carrie.Gill@energy.ri.gov ;
Becca Trietch (OER)	Becca.Trietch@energy.ri.gov ;
Todd Bianco (PUC)	Todd.Bianco@puc.ri.gov ;
Cindy Wilson-Frias (PUC)	Cynthia.Wilsonfrias@puc.ri.gov ;
Alan Nault (PUC)	Alan.nault@puc.ri.gov ;
Luly Massaro (PUC)	Luly.Massaro@puc.ri.gov ;
Christy Hetherington (DPUC)	Christy.hetherington@dpuc.ri.gov ;
John Bell (DPUC)	John.bell@dpuc.ri.gov ;
Thomas Kogut (DPUC)	thomas.kogut@dpuc.ri.gov ;
Maggie Hogan (DPUC)	Margaret.l.hogan@dpuc.ri.gov ;
Jon Hagopian (DPUC)	jon.hagopian@dpuc.ri.gov ;
Greg Booth (DPUC)	gboothpe@gmail.com ;
Robin Blanton (DPUC)	rblanton@utilityengineering.com ;
Matthew Ouellette (DOT)	Matthew.Ouellette@dot.ri.gov ;
Robert Rocchio (DOT)	Robert.Rocchio@dot.ri.gov ;
Joseph Bucci (DOT)	Joseph.Bucci@dot.ri.gov ;
Jill Nascimento (DOT)	Jill.Nascimento@dot.ri.gov ;

John Paul Loether (HPHC)	johnpaul.loether@preservation.ri.gov ;
Charlotte Taylor (HPHC)	Charlotte.Taylor@preservation.ri.gov ;
Nicole Lafontaine (North Kingstown Planning Board)	NLaFontaine@northkingstown.org ;
Roberta Groch (DOA)	Roberta.Groch@doa.ri.gov ;
Jennifer Sternick (DOA)	Jennifer.Sternick@doa.ri.gov ;
Nancy Lavin (Providence Business News)	Lavin@pbn.com ;
Christian Capizzo (Partridge Snow & Hahn LLP)	ccapizzo@psh.com ;
Christina Hoefsmit (DEM)	Christina.Hoefsmit@dem.ri.gov ;

EFSB 4-1

Request:

Refer to the response of Revolution Wind to EFSB 1-2 supplemental, which contains the following statement in the last paragraph:

“As discussed in the original response to data request EFSB 1-2(b), the Project removed use of that access road from consideration during the design phase for numerous reasons, including that The Narragansett Electric Company d/b/a National Grid (TNEC) has existing infrastructure in it, including electric distribution and telecommunications facilities, which Revolution Wind would have to cross while maintaining any required separation to avoid mutual thermal heating of the TNEC and Revolution Wind facilities – an issue the Project saw as a constraint in the engineering evaluation for use of this access road.”

And refer to the responses of National Grid to EFSB 2-1 and 2-2 which indicates that there are no underground electric facilities within the access road and the connecting road to Circuit Drive.

And refer to the map in the response of National Grid to EFSB 1-3 indicating that there are no electric facilities that run north from the corner of the connecting road all the way to the substation, but only a string of poles carrying low-voltage telecommunications lines.

- (a) How many crossings of TNEC electric distribution facilities occur on the access road?
- (b) If there would be mutual thermal heating constraints on the access road where the transmission cable crosses under the overhead electric facilities, please explain in detail why that is the case.
- (c) If there are no mutual thermal heating constraints caused by crossing under the overhead electric distribution facilities, please clarify the inconsistency with the response to data request EFSB 1-2 supplemental that it would have to cross electric distribution facilities while maintaining any required separation to avoid mutual thermal heating of the TNEC and Revolution Wind facilities.

Response:

- a. None.
- b. There would be no mutual heating between an overhead and underground electric circuit.

- c. At the time that Revolution Wind, LLC ("Revolution Wind") made the decision to cease consideration of the access road as a potential onshore cable route, and at the time Revolution Wind submitted its supplemental response to data request EFSB 1-2(b) and provided testimony at the October 12, 2021 hearing in this matter, Revolution Wind had a good faith belief that The Narragansett Electric Company ("TNEC") had existing underground infrastructure that ran north along the access road. Revolution Wind's good faith belief was based on conversations between Revolution Wind representatives and TNEC representatives, as well as Revolution Wind's general understanding and expectations of where such infrastructure would likely be located based on Eversource's experience as a distribution utility operator. Revolution Wind had not, however, performed any geotechnical studies or surveys of that portion of the access road, nor had it asked TNEC to perform or provide such studies. Accordingly, Revolution Wind provided its supplemental response to data request EFSB 1-2(b) based on its then-existing good faith belief about the location of underground TNEC infrastructure.

Revolution Wind learned definitively after providing the supplemental response to data request EFSB 1-2(b) and after giving testimony at the October 12, 2021 hearing in this matter that TNEC has no underground infrastructure running north along the access road, and that any concerns about mutual heating that Revolution Wind previously had regarding the use of that access road are unfounded and do not impact whether it is feasible for Revolution Wind to use the access road as part of the onshore cable route for the project.

Revolution Wind also refers to its responses to Record Request 2 and Data Request EFSB 3-4.

EFSB 4-2

Request:

Refer to Section 5.4 of the Environmental Report, the original filing provided the number of times the Quonset Point Business Park alternative would cross existing utilities. Please indicate how many times the preferred alternative (referenced in the Applicant's April 9, 2021 filing) will cross existing utilities, including an identification of the location on one of the Applicant's route maps for each crossing. Please provide a list describing the type of utility infrastructure being crossed in each instance (i.e., electric, natural gas, water, sewer, etc...), and whether the existing utility infrastructure being crossed is overhead or underground.

Response:

The design drawings for the Preferred Route using the "Emissive Energy" route are included in the Application for a Major Energy Facility, Volume 1, December 30, 2020, Appendix A, Onshore Transmission Cable Plans on PG-05, 06, 10, 11, 12, 13, 14, 15, 16 and 17. This route and corresponding design pages indicate the existing overhead and underground utilities for the preferred route including: water, gas, storm drains, fiber optic cable and overhead distribution lines. Typically, transmission line design runs within the roadway and any overhead distribution and utility lines run adjacent and parallel to the roadway and our proposed route.

The utility infrastructure crossed by the transmission line includes:

	Underground						Overhead
Design Page #	Gas	Water	Storm	Fiber Optic Cables	Sanitary	Distribution Line	Utilities
PG-05	3						
PG-06	1						2
PG-10	2	2	4	1	5		1
PG-11	1	2	4		4		1
PG-12		2		1	2		
PG-13		3	4	1		1	
PG-14		2	2		2		
PG-15							
PG-16	2	1	1				1
PG-17		1	1	1			1

Note: Not all overhead utility/service laterals are captured during surveys and may not be correctly articulated in this table.

EFSB 4-3

Request:

Please provide a list of all easements or other property rights that have already been acquired or will be necessary to acquire to accommodate the preferred alternative as defined by the April 9, 2021, including an identification of the location on one of the Applicant's route maps. Please indicate in each instance whether such easements and property rights have already obtained or have not yet been obtained.

Response:

The easements required for the Revolution Wind preferred alternative are listed below:

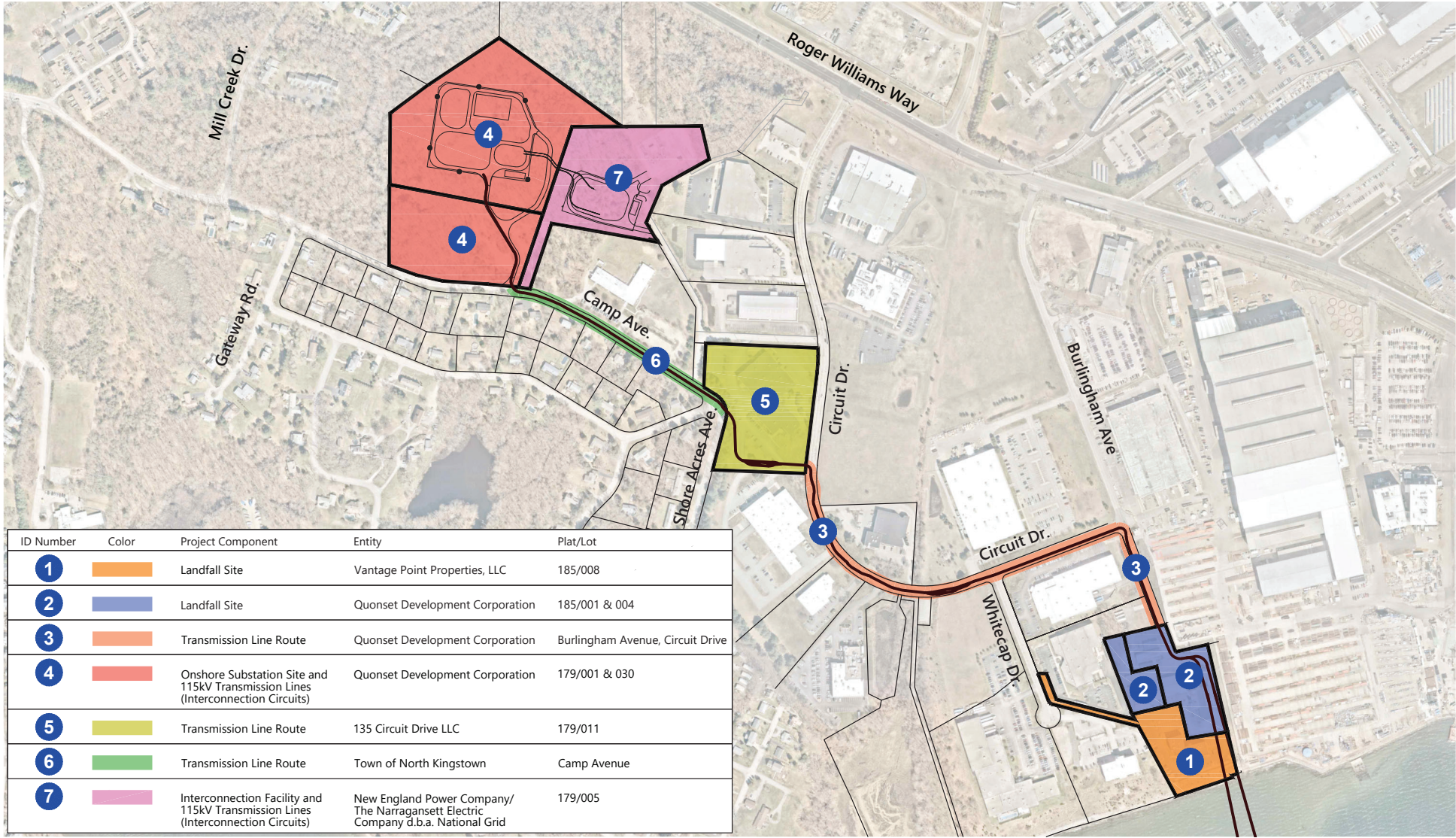
Entity	Project Component	Status
Vantage Point Properties, LLC	Landfall Site	Executed Option Agreement
Quonset Development Corporation	Landfall Site, Transmission Line Route (Burlingham Avenue, Circuit Drive), and Onshore Substation site and 115kV Transmission Lines (Interconnection Circuits)	(1) Executed Option Agreement(s) for Revolution Wind Project (2) TNEC Easement modification to accommodate new Right-of-Way under discussion
135 Circuit Drive LLC	Transmission Line Route	Executed Option Agreement
North Kingstown	Transmission Line Route in Camp Avenue	(1) Host Community Agreement under discussion (2) Camp Avenue Easement under discussion
New England Power Company d.b.a. National Grid	Interconnection Facility and 115kV Transmission Lines (Interconnection Circuits)	Executed LGIA

Revolution Wind, LLC Application to Construct a Major Energy Facility
EFSB Docket No. SB-2021-01
Revolution Wind, LLC's
Response to the Energy Facility Siting Board's Data Requests, Set 4
Issued on October 15, 2021

Entity	Project Component	Status
The Narragansett Electric Company d.b.a National Grid	Interconnection Facility and 115kV Transmission Lines (Interconnection Circuits)	(1) Easements rights for 115kV transmission line under discussion (2) Temporary Construction Access agreement needed to build ICF under discussion

Revolution Wind also refers to Attachment EFSB 4-3-1.

\\vhb\gsh\proj\Providence\73032 01 RWF-Export Cable (2)\Graphics\FIGURES\Lease Options.dwg



**Revolution
Wind**

Powered by
**Ørsted &
Eversource**

Revolution Wind
Easement Option Properties
North Kingstown, RI

**Attachment
EFSB 4-3-1**