

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

November 5, 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") Responses to the Division of Public Utilities and Carriers' (the "Division") First Set of Data Requests, issued on November 1, 2021. This filing contains Revolution Wind's complete response to the First Set of Data Requests.

Thank you for your attention to this matter.

Very truly yours,

Adam M. Ramos

Robin L. Main

Robin L. Mai

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	<u>TownCouncil@northkingstown.org</u> ;
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;

<u>DIV 1-1</u>

Request:

In your responses, you reference a concern about thermal interference if you install the cables along the proposed access road route.

- a. What is the level of thermal interference that you anticipated?
- b. Provide the current carrying capability of the cable as designed.
- c. Provide the calculated cable derating due to thermal interference including the calculations.
- d. Provide each source creating the thermal interference and the level of that interference.

Response:

- a. Please see The Narragansett Electric Company's (TNEC) response to EFSB 3-1 and 3-2.
 - Based on our present knowledge that no existing TNEC utility infrastructure exists within the proposed alternate access road route, there would be no thermal interference with the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR 1-1.
- b. The 275 kV onshore transmission system is presently designed to carry 880 amps of full load current at 100% load factor, per 3 phase circuit (1760 amps for both circuits).
- c. Based on response a., above, cable derating due to thermal interference is not applicable for the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR 1-1.

 Revolution Wind will update this response if any underground facilities are located during subsurface utility engineering survey.
- d. Based on response a. and c., above, there are no sources of thermal interference that would result in cable derating associated with the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR 1-1. Revolution Wind will update this response if any underground facilities are located during subsurface utility engineering survey.

<u>DIV 1-2</u>

Request:

Can you describe the facilities that National Grid has along the access road currently?

Response:

Please see The Narragansett Electric Company's (TNEC) response to data request EFSB 1-3.

Based on TNEC's statement that no existing underground utility infrastructure exists, Revolution Wind's understanding is that TNEC's present infrastructure (communication line) along the access road is overhead only. It should be noted that Revolution Wind performed a subsurface utility engineering survey along the private portion of Camp Ave and additional subsurface utility surveys need to be completed along the remainder of the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR1-1 to confirm all underground facilities present.

<u>DIV 1-3</u>

Request:

If National Grid extends either transmission or distribution facilities along the access road and your cable is along your preferred route, will your cable experience thermal interference since the National Grid facilities will most likely be along either Circuit Drive or Camp Avenue?

Response:

Please see The Narragansett Electric Company's (TNEC) response to data request EFSB 3-2.

If additional future heat generating infrastructure is installed along Circuit Drive or Camp Avenue in the proximity of the proposed preferred route, then the probability does exist for mutual heating of adjacent utilities and subsequent derating issues. The extent of mutual heating can only be addressed based on specific electrical attributes of the proposed utility, the proximity to Revolution Wind's facilities, thermal resistivity of the proposed future utility backfill, etc. Engineering measures or physical separation could be incorporated to reduce or negate the mutual heating, but this would have to be studied on a case by case basis.

DIV 1-4

Request:

Are you aware whether National Grid has any plans to extend additional facilities along the access road? If so, state your understanding.

Response:

Revolution Wind is not aware at this time whether National Grid has any plans to extend facilities along the access road. Revolution Wind has contacted National Grid about this matter, and National Grid has agreed to provide a response to the Division.

DIV 1-5

Request:

Can you describe the width of the National Grid easement along the access road?

Response:

Please see The Narragansett Electric Company's response to data request EFSB 1-1, Response C, and Attachment 1-1C to the response.

DIV 1-6

Request:

You indicate the owner of Parcel 179-019 was not responsive. Did you approach the owner of Parcel 179-003 as a possible route? Would this also reduce the chance of thermal interference which is a concern to Revolution Wind?

Response:

Please see Revolution Wind's response to data request EFSB 3-1, clarifying the communication with the owner of Parcel 179-019.

Revolution Wind approached and received subsequent approval from the owner of Parcel 179-003 on a number of occasions for passive access to the property located at 646 Camp Ave, which is owned by North Kingstown Camp Ave. Real Estate Inc. (Eurofins).

Revolution Wind approached Eurofins beginning on October 20, 2021, to discuss the possible granting of an easement to site the 275kV transmission lines on either the northern or southern portion of its property. Revolution Wind representatives called and were referred to the President of Eurofins Environment Testing New England. Revolution Wind representatives exchanged emails with Eurofins representatives on October 20, 2021, and received email approval to walk the Eurofins property on October 22, 2021, for the EFSB Site Tour. Calls also were placed to Eurofins on October 22 as the tour was entering their property.

Eurofins representatives also informed Revolution Wind representatives that there would be a discussion with the Eurofins Board of Directors and legal department as to whether they would be interested in considering granting the project an easement for a possible cable route across the Eurofins property.

Follow-up emails were sent on October 21 and October 26. As of November 5, 2021, Revolution Wind has not received any further follow-up.

DIV 1-7

Request:

How much additional cable would be required if this access road route was utilized compared to the route along Camp Avenue?

Response:

If the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR1-1 were utilized in lieu of the Revolution Wind preferred route, then there would be approximately 2,250 additional feet of cable (6 phases x 375'). There would also be the need for the additional conduit, thermal backfill and excavation associated with the added duct bank.

<u>DIV 1-8</u>

Request:

Are there water and sewer facilities along Camp Avenue that would need to be avoided? If so, please provide details.

Response:

Yes, the proposed preferred route has been designed to avoid the existing underground utilities including gas, water, and storm sewer. In general, the proposed preferred route runs in parallel with the gas and water with some lateral crossings of the above-listed utilities. These lateral crossings were provided in Revolution Wind's response to data request EFSB 4-2. The plan and profile designs for the proposed preferred route were provided in the Application for a Major Energy Facility, Volume 1, December 30, 2020, Appendix A, Onshore Transmission Cable Plans. Those plans specifically show all the existing utility infrastructure that was found as part of our Subsurface Utility Engineering survey.

For the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR1-1, the existing underground facilities in the private portion of Camp Ave are included in Application for a Major Energy Facility, Volume 1, December 30, 2020, Appendix A, Onshore Transmission Cable Plans.

DIV 1-9

Request:

Based upon the map you provided on October 22, 2021, the Camp Avenue route has both gas and electric facilities which Revolution Wind will have to contend with along this entire route. However, the access road route only has a short section (approximately 2 spans) of overhead poles. Explain in detail why this would not be an easier route to install the cable and reduce both the installation time and cost of the project?

Response:

The proposed preferred route runs parallel to, and with sufficient offset from, existing utilities along Camp Ave aside from a few gas or water service connections, as depicted in the Application for a Major Energy Facility, Volume 1, December 30, 2020, Appendix A, Onshore Transmission Cable Plans. This type of construction is common for new subsurface utility installation; as such, the proposed preferred route has minimal if any impact associated with increased difficulty or added costs attributable to working in proximity to other utilities.

The proposed preferred route utilizes a new access road to the proposed OnSS that needs to be built regardless of the path of the underground transmission route. In addition to not requiring additional easements, revised electrical and civil engineering designs and updates to permits, a process that would entail some time and cost, the proposed preferred route is shorter than the proposed alternate access road route, and will result in a shorter installation duration.

Construction in the paved portion of the TNEC access road may be faster; however, TNEC has informed Revolution Wind that TNEC must maintain 24-hour access to its substation, which may complicate and lengthen the duration of construction along the TNEC access road. To evaluate the overall installation time and cost, several other items have been considered by Revolution Wind. These include the underground utilities along Circuit Dr. and the private portion of Camp Ave, which impact the installation of splice vaults, and the construction of an additional access road to build and maintain the 275kV transmission line across TNEC property.

DIV 1-10

Request:

Will Revolution Wind have to contend with any water or sewer lines along either route? If yes, please explain in detail.

Response:

The proposed preferred route will have relatively minor crossings of existing utility infrastructure compared to other typical underground transmission projects. The total number of existing utility crossings of the proposed preferred route was provided in Revolution Wind's response to data request EFSB 4-2. Additional details are available in the design drawings included in Application for a Major Energy Facility, Volume 1, December 30, 2020, Appendix A, Onshore Transmission Cable Plans. To understand the existing underground utility infrastructure for the Potential Alternate Cable Duct Route depicted on Attachment EFSB RR1-1, additional subsurface utility engineering surveys need to be completed along the TNEC access road to complement the subsurface utility information already acquired. Based on current information, neither route will have significant complications associated with water or sewer lines.