STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company : d/b/a National Grid :

(J16S 115kV Transmission Line : Docket No. SB-2021-

Thermal Upgrade Project :

Cumberland, Rhode Island) :

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

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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 of an existing transmission line 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 Rule 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 1.6(F) 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 find 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 1.2(D) and 1.6(F)).

TNEC is proposing to reconductor¹ five spans between Structures 130 and 135 of the existing J16S 115 kV Transmission Line (the "J16S Line") located in Cumberland, Rhode Island between the Staples Substation and the Highland Park Substation. This portion of the J16S Line

¹ "Reconductoring" is the replacement of the conductors (wires) of an existing transmission line with new, larger conductors which are capable of carrying more power. In many cases it also involves the replacement or reinforcement of existing pole or tower structures.

is approximately 0.61 miles (3,242 feet) long. In this Application, TNEC requests the Board's approval of the reconductoring of the J16S Line (the "Project").

TNEC is filing herewith and incorporates herein a Siting Report entitled "J16S 115kV Transmission Line Thermal Upgrade Project" (the "Siting Report"). This application follows the organization of Rule 1.6(F) 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.²

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

<u>Exhibit 1</u>, attached. A listing of non-US affiliates is available upon request.

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

The entire J16S Line extends a distance of approximately 1.7 miles from the Staples Substation to the Highland Park Substation located in Cumberland. TNEC proposes to reconductor the 0.61-mile portion of the J16S Line between Structures 130 and 135. The J16S Line consists of double-circuit, square-base, suspension and dead-end lattice towers which are

² 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.

³ 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.

shared with the R9 115 kV Line. 4 The R9, which shares structures with the J16 along the Project, will also be reconductored because the replacement of structure 133 with a taller structure will require the introduction of splices into the conductor and it is the Company's standard that there shall be no splices in spans that cross ponds or are within 100 feet of dead-end clamps. The reconductoring of the R9 is included in the Siting Report but it is not considered to be jurisdictional as it will not increase the normal carrying capacity for the R9 Line. The route of the line is shown in the Project Alignment Drawings, Figure 3-1 of the Siting Report. In addition to replacing the existing conductors with new, larger conductors, the following six structural upgrades will be required to support the proposed new conductors: (1) reinforcement of Structures 130 and 135; (2) replacement of tower hanger members at Structures 134 and 131; (3) replacement of Structure 133 with a steel pole structure; (4) replacement of insulator strands and Structures 130 through 135; (5) conversion of Structure 132 to a suspension structure and replacement of hanger members; and (6) install conductor weights on Structure 136. The structure replacements and reinforcements are necessary for strength and ground clearance for the new larger conductor. The Project is described in more detail in Section 3.0 of the Siting Report.

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

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

⁴ A drawing of a typical structure can be found in the Siting Report, Figure 3-2.

⁵ 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 the applicant may so state and need not provide a detailed analysis of the baseline conditions for that resource."

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 §§6.6 and 7.13.1 of the Siting Report.

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

 The need for the Project is described in Section 2 of the Siting Report.
- 5. The reasons why 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 modification⁷ or relocation of an existing power line shall not be an alteration <u>unless</u> the Board determines that the project may result in a significant impact on the environment or the public health, safety and welfare. [Emphasis supplied.]

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 a portion of the existing J16S Line between Structures 130 and 135, and reinforcement and replacement of the Structures within the 0.61-mile section of the right-of-way.

The impacts of the Project are discussed in Section 7.0 of the Siting Report and summarized in Sections 7.1 and 7.2. In summary, 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

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⁶ EFSB Rule 1.6(F)(4) requires the applicant to provide all studies and forecasts which demonstrate the need for the proposed facility under the statewide master construction plan submitted annually.

⁷ Per EFSB Rule 1.2(D), modification "includes reconductoring and rebuilding an existing power line."

the Project does not constitute an alteration and is not subject to the full EFSB permitting process.

CONCLUSION

This Application and the Siting Report, which is filed herewith and incorporated herein, and the other supporting material clearly demonstrate that the proposed reconductoring of the existing J16S 115 kV Transmission Line 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).

Respectfully submitted,

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