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-

(Portable LNG Vaporization Project

Old Mill Lane, Portsmouth, RI) :

Petition for Waiver Extension The Narragansett Electric Company <u>d/b/a National Grid</u>

Counsel:

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May 19, 2021

INTRODUCTION

The Narragansett Electric Company d/b/a National Grid (the "Company") hereby petitions the Rhode Island Energy Facility Siting Board ("EFSB" or "Board") to extend the waiver from the licensing requirement of the Energy Facility Siting Act ("Act") previously granted by the Board on January 8, 2020, to operate a portable liquefied natural gas ("LNG") vaporization facility at Old Mill Lane, Portsmouth, Rhode Island (the "Property") to provide standby peak-shaving and backup supply to the Aquidneck Island natural gas distribution system for the winter of 2021/2022 (the "Project"). The Company is requesting a one-year extension of the Board's existing waiver so that it may operate the Project this winter while it completes the EFSB licensing process for the future operation of the Project at the Property. Simultaneously with this Petition, the Company has filed an application to the Board seeking a license for the recurring operation of the Project at Old Mill Lane (the "Application").

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

A. Property

The Property is a five (5) acre parcel of which approximately 30,000 square feet will be fenced and used for the Project. The Property is owned in fee by the Company and is located adjacent to the gate station, which is the only connection between the Aquidneck Island natural gas distribution system and the interstate natural gas transmission system. The Property has been used for stand-by peak-shaving for Aquidneck Island the past two winters; for temporary backup during maintenance activities on the transmission pipeline in 2018; and for emergency backup supply during an outage in 2019.

B. Project Need

The reliability need for the Project is unquestionable and is described in detail in the Company's Application, which is filed herewith. As noted in the Application and in previous filings, the natural gas distribution system on Aquidneck Island is supplied by a lateral extension of the interstate natural gas pipeline which is known as the Algonquin G lateral. Aquidneck Island is at the end of the lateral which makes the natural gas supply to Aquidneck Island vulnerable to upstream supply constraints. In addition, in early 2019 the Company was made aware that the interstate pipeline operator may impose hourly supply limitations for the 2019-2020 winter heating season. There is only one transmission system connection to Aquidneck Island so any service interruption and/or capacity constraint on the transmission system may negatively impact the Company's ability to provide reliable service on Aquidneck Island. The Project addresses both of these capacity vulnerability and capacity constraint needs. Therefore, starting the winter of 2019-2020, the Company has mobilized portable LNG vaporization equipment at the Property during the winter months to maintain reliable service to its customers. The Company is evaluating other long-term solutions to these needs, but even if the Company were to identify a superior alternative it would not be able to place it in-service in time to meet the upcoming winter demand. Thus, the Property remains the only viable location to meet the reliability need for the winter of 2021-2022.

C. Project Overview

The Project will operate on the same schedule that it has for the last two winters. The facility will be mobilized in time to be online on December 1, 2021 and it will be in operation until March 31, 2022. Setup will occur over approximately a two-week period and will begin with clearing of vegetation, installation of composite mats that provide a stable work surface, and

installation of temporary fencing around the perimeter of the Project. The portable equipment will be delivered after the mat and fence are installed. The Project utilizes the following seasonal equipment: portable vaporizers, portable booster pumps, portable storage tanks, portable generator, and a mobile office. The equipment, followed by the mats and fencing, will be removed once the facility is taken offline after March 31, 2022. The area will be is reseeded and the site will be maintained as a mowed lawn during the Spring, Summer, and Fall.

E. Outreach

The Company has maintained regular contact with the Towns of Portsmouth and Middletown and will continue its outreach and safety meetings with local officials. The Company will also maintain the Project website that includes contact information should the general public have any questions. Finally, prior to mobilizing the Project, the Company will notify town officials and the neighbors along Old Mill Lane of the scheduled work and provide the contact information for the Company representative should they have any questions.

CONCLUSION

WHEREFORE, the Company respectfully petitions the Board to grant a waiver of the licensing requirement for the Project to operate at the Property for the winter of 2021-2022.

THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID By its Attorney,

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