

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD**

**In re: Relocation of Transmission Lines** : **Docket No. SB-2003-01**  
**in Providence and East Providence** :  
**(E-183 115kV Transmission Line** :  
**Relocation Project – A/C I-195 Relocation)** :

**MOTION OF THE CITY OF PROVIDENCE  
TO EXTEND THE TIME FOR BRIEFING**

Now comes the City of Providence, pursuant to Rule 1.17(a) of the Rules and Practice and Procedure of the Energy Facility Siting Board (“Board”) and hereby requests additional time in order to provide further detail about the City’s September 25, 2017 proposal for a hybrid of the underground and South Bridge alignments. In support of this motion, the City states:

1. The hybrid route was generated through meetings which took place between the Mayor of the City and representatives of the Friends of India Point Park (“Friends”) on Friday, September 22, 2017, at a time when Deputy City Solicitor Adrienne Southingate was out of the office prior to some scheduled surgery on Tuesday, September 26, 2017.
2. Following counsel’s return to the office on September 28, counsel contacted the Friends to obtain the name and affiliation of the consulting engineer who had proposed the hybrid configuration. Friends advised that Rick Ponti of Stantec, Inc. was the author of their own feasibility study; however, Mr. Ponti had a quadruple bypass on September 5, and is not currently available to appear and consult. Friends has informed counsel that once Mr. Ponti is discharged from his rehabilitation facility, he would be ready and willing to travel to Providence from his New Hampshire home in order to assist the parties.

3. In the interim, on October 5, 2017, the Company's attorney and underground engineering specialist met with counsel and representatives of several affected City departments (Planning, Parks, and Public Works) to review the locations of the transition stations proposed by Friends and to review the route of the "cut and cover" underground conduit through India Point Park.
4. During the site visit, National Grid's engineer delineated the site requirements for transition stations: a location of roughly 20,000 square feet, at a single elevation, not too close to an interstate highway (salt from snow-plowing operations can cause "flash over" and take a line out of service), and from which the overhead wires will not need to cross improved property.
5. The first Friends' site is in the vicinity of the Brown Boathouse. The site visit group considered two possible locations. The one apparently depicted on the Friends' map [Location 2- East] is in close proximity to Route 195. An alternative in the general area [Location 1 – East] was also considered because it removed the transition station from proximity to the highway. In both of these venues, the City planner pointed out that the original RIDOT plan had been to connect India Street through the second arch of the Washington Bridge, and build parking under the first and third arches. Either of the scenarios for a transition station would make those plans impossible.
6. The site visit group also reviewed the Friends' second transition station location [Location 3 – West], a triangular parcel. However, the group located two other potential sites [Locations 1 & 2 – West], both of which boast adequate space and grade as well as separation from the highway.
7. National Grid has suggested that the City's response, which would be due today absent an extension from the Board, should discuss (a) the City's ability and means to

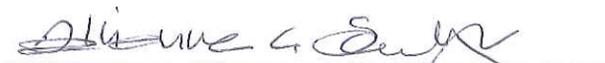
acquire the transition station sites; and (b) the City's plan to address the funding shortfall.

8. In order to provide meaningful answers, the City will need additional time to ascertain whether the site "requirements" described by National Grid's engineer are absolute. The City needs expert guidance to determine whether a smaller area could be used for the transition stations, potentially enabling the City to acquire smaller parcels or portions of the parcels tentatively identified as transition station sites.
9. Secondly, the City needs the most current information on the funds actually available for the underground route, including the construction of the transition stations.
10. National Grid estimated that it would require six months to evaluate the Providence proposal, including development of a conceptual design and route layout, desktop environmental review and development of a project cost estimate.

Wherefore, the City respectfully requests that the Board extend the time for filing a responsive pleading to thirty days following National Grid's evaluation.

Respectfully submitted,

**CITY OF PROVIDENCE**



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