STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

IN RE: The Narragansett Electric Company Notice of Intent to Relocate Transmission Lines in Providence and East Providence (E-183 115kV Transmission Line Relocation Project – A/C I-195 Relocation)

Docket No. SB-2003-01

SUPPLEMENTARY MEMORANDUM IN SUPPORT OF PROVIDENCE'S OBJECTION TO JOINT MOTION OF NATIONAL GRID AND THE CITY OF EAST PROVIDENCE TO ESTABLISH AN ALTERNATIVE OVERHEAD ALIGNMENT

On October 28, 2016, the City of Providence ("Providence") responded to the Joint Motion filed by National Grid and the City of East Providence to establish an alternative overhead alignment, the Bridge Alignment South, for the crossing of the Seekonk River.

Since that time, the parties have jointly explored the alternative urged by Providence in that earlier submission, the so-called "underbridge alignment." Engineering specialists retained by the cities, National Grid, and by the Rhode Island Department of Transportation all participated in a review of the possibilities. Power Delivery Consultants, Inc. filed its report on July 11, 2017, enumerating the various crossings and their suitability for use as substitutes for the horizontal directional drilling ("HDD") to span the Providence and Seekonk Rivers.

Expert opinion is unanimous that HDD for the Providence River crossing has significant challenges and a high risk of failure. With the July report, it is now clear that the Providence River crossing will not be effectuated through the use of one or more of the existing bridges.

Nevertheless, Providence continues to advocate for burial of such portions of the E-183 line as can reasonably be accomplished. A pool of funds created by the 2004 set-aside of

refunds, originally \$5,800,000, has certainly been augmented by accrued interest. While Providence has no current accounting of the other funds which were to have been devoted to the underground alignment, it is reasonable to assume that several millions of dollars are available.

Providence is willing to accept the position taken by the other parties to this docket, adopting the South Bridge Alignment, with this critical exception: we request that the funds derived from Providence ratepayers be devoted exclusively to burying the power lines from Temporary Pole #1 to Temporary Pole #7. As we understand it, this would require the construction of two transition stations, an expensive proposition. But this use of the funds would honor the concerted efforts of citizens, elected officials, business and civic leaders, organized labor, and government agencies to see the power lines buried through India Point Park. It would ensure that significant aesthetic and ancillary benefits flow to residents of the City of Providence, who have contributed no small amount to see this project completed.

Respectfully submitted,

THE CITY OF PROVIDENCE

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