

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

REPLY TO MOTION FOR EXTENSION OF TIME
FILED BY NATIONAL GRID

The City of Providence (“Providence”) welcomes the Motion filed by the Narragansett Electric Company, d/b/a National Grid (“National Grid”), for an extension of time to allow the parties to engage the engineering firm PDC, the same firm which conducted the peer review of the original underground alignment, to review the feasibility of the a hybrid route, the so-called under-bridge alignment (“UBA”). In the absence of any relevant, current testimony from the Rhode Island Department of Transportation (“RIDOT”), seeking PDC’s expert opinion as to whether the UBA is a viable alternative is the most expeditious and least costly means of resolving the question left open by the 2004 Settlement Agreement: if the E-183 is not to be buried, which alternative route will be chosen?

By way of brief background, the Settlement Agreement contemplates joint action by the parties to designate the alternative route if they conclude that the underground alternative is not feasible. The October 12, 2016 filing by National Grid and the City of East Providence purports to reach that conclusion, and selects the Bridge Alignment South route. The Attorney General concurred in both the conclusion and the selection.

To be clear, Providence has never, in any pleading or representation of counsel, conceded that the original underground alignment is not feasible. Providence admits that the costs of that

alignment are substantially in excess of any alternative alignment, and further, that the risk of failure of the horizontal directional drilling necessary to make the under-river crossing may be uncomfortably high. However, it is precisely for these reasons that Providence (and particularly the Friends of India Point Park, who have steadfastly insisted that Providence focus on the economic development, tourism and health benefits which would flow from the undergrounding of the power lines) has sought a hybrid configuration, combining the best of the underground alignment with the less expensive and far less risky UBA (utilizing the South Bridge Alignment for that particular crossing). To date, of course, the only testimony which has been provided on the UBA comes from National Grid's witness, David Kampilii, who argues that there are simply too many engineering challenges to that option, even if RIDOT were to acquiesce in the use of its bridges.

Finally, should the Board grant National Grid's motion and authorize an expert engineering review of the UBA, a potentially major impediment to its adoption remains. Despite the fact that both the underground alignment and the South Bridge Alignment are explicitly included in the Settlement Agreement, the Board's legal counsel has taken the position that *any* deviation from the four originally-identified routes would require National Grid to file a new application. Yet, this position is contrary to the terms of the Settlement Agreement and to the clear understanding of the parties. The parties themselves refer to the UBA as a "variant" – sometimes of the underground alignment, other times of the South Bridge Alignment. The actual route of the power lines does not materially differ from the course originally identified in the Settlement Agreement; the only difference is that the wires would cross the rivers not under the riverbed or suspended from towers, but attached to a bridge. Suggesting that this minor change in elevation requires an entirely new application would be to exalt form over substance.

Providence believes that far too much time has been devoted to the siting of these power lines to now simply consign years of work to the circular file, when this Board, the parties, and the public all know that such a choice would mean no change in the existing configuration of the transmission lines – something that the Settlement Agreement made clear was not an acceptable option.

For these reasons, the City of Providence supports National Grid's motion for an extension of time to enable the parties' expert engineering firm to work with RIDOT to ascertain whether the UBA is feasible.

Respectfully submitted,

THE CITY OF PROVIDENCE



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DOCKET NO. SB-2003-1**Relocation of Transmission Lines in Providence and East Providence****(E-183 115kV Transmission Line Relocation Project – A/C I-195 Relocation)**

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