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May 9, 2018

Patricia S. Lucarelli, Esq.  
Administrative and Legal Support Services Administrator  
Rhode Island Energy Facility Siting Board  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

Re: **In re: The Narragansett Electric Company d/b/a National Grid  
Petition for Declaratory Order**  
(Allens Avenue Main Replacement Project)

Dear Patti:

I am enclosing for filing an original and six (6) copies of the Petition for Declaratory Order pursuant to R.I. Gen Laws § 42-35-8 on behalf of The Narragansett Electric Company d/b/a National Grid for the Allens Avenue Replacement Project in Providence.

Very truly yours,



George W. Watson III

Enclosure

Copy to: Bess Gorman, Esq.

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PUBLIC UTILITIES COMMISSION

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

In re: THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID  
Petition for Declaratory Order  
(Allens Avenue Main Replacement Project)

**PETITION FOR DECLARATORY ORDER**

In accordance with R.I. Gen. Laws § 42-35-8, The Narragansett Electric Company d/b/a National Grid (“TNEC”) hereby petitions the Rhode Island Energy Facility Siting Board (“EFSB”) for a Declaratory Order that the proposed replacement of 1,600 linear feet of an existing gas pipeline and improvements to the existing pipeline manifold (collectively, the “Project”) are not an alteration as defined under R.I. Gen. Laws § 42-98-3(b) and Rule 1.2(d) of the EFSB’s Rules of Practice and Procedure. The existing pipeline and manifold<sup>1</sup> are located at 642 Allens Avenue, Providence, RI which is owned in fee by TNEC.

1. Identification of the Owner of the Facility

TNEC is the owner and operator of the gas pipeline. TNEC is a subsidiary of National Grid USA, Inc. and its business address is 280 Melrose Street, Providence, Rhode Island 02907. The Project is located on property owned in fee by TNEC.

2. Detailed Description of the Project

A. Components

The Project is the replacement of a 1,600 foot segment of the existing 1940s vintage 12-inch and 16-inch pipeline with a 16-inch pipeline. The Project also includes improvements to the manifold for maintenance purposes and to accept the 16-inch pipe. The manifold is located in a

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<sup>1</sup> A manifold is used to connect multiple smaller pipes to one larger pipe.

concrete vault and it serves as the western connection point to the three pipelines that cross the Providence River.

### B. Need and Cost

The Project is needed to address TNEC's concerns with the quality of the vintage welds in the pipeline that were identified during a recent inspection. The Project summary below is from TNEC's Gas Infrastructure, Safety and Reliability Plan FY 2019 Proposal (Revised) dated February 21, 2018 that was filed in the Rhode Island Public Utilities Commission ("PUC") Docket No. 4781.

This project is necessary to replace approximately 1,600-feet of existing 1940s vintage 12-inch and 16-inch steel main located on the Company property on Allens Avenue in Providence. A girth weld on the existing pipeline was exposed during a gas pressure regulation engineering project. The appearance of the weld concerned the inspector on-site, who then requested that the weld be assessed by both visual and non-destructive examination testing methods, such as x-rays. The examination indicated that the weld did not meet current acceptability standards for welding of pipelines and related facilities, which raised concerns about the structural integrity of the girth welds. After review of available documentation and as-built conditions, it was determined that the weld at issue could be indicative of the weld quality over the entire 1,600 foot line segment... Thus, the Allens Avenue Main Replacement project will address the concern of the integrity of the pipeline by replacing both the pipe and welds constructed to current construction standards. This pipe is critical to the Company's gas distribution system because it helps move gas from the pipeline company at the Wampanoag Trail citygate in East Providence and gas regulator station on Allens Avenue. In addition, this project will address corrosion that has been identified in the vault located at the Allens Avenue river crossing. The project will include the replacement of 42 feet of existing 10-inch 200 psig vault piping with 42 feet of 12-inch coated steel pipe. Additional work includes the replacement of the three existing 10-inch 200 psig coated steel runs with 30 feet of 10-inch coated steel along with three 10-inch ball valves. For FY 2019, the Company plans spending of \$4.74 million for this project. The expected completion date for this project is the summer of 2018.

### 3. The Project Does Not Constitute a Major Energy Facility Nor the Alteration of a Major Energy Facility

TNEC has filed this petition based on its belief that the Project does not constitute an "alteration" of a major energy facility because the replacement of existing pipeline is not a

“significant modification to a major energy facility which... will result in a significant impact on the environment or the public health, safety and welfare.”<sup>2</sup>

4. Additional Information

Since the Project is the replacement of a small section of an existing pipeline within the existing location (TNEC owned property) and since the Project will not result in permanent visual impacts, outreach has been limited to reviewing the Project with the PUC and obtaining the necessary local permits.

CONCLUSION

For the reasons stated above, TNEC respectfully requests that the EFSB issue a Declaratory Order pursuant to R.I. Gen Laws § 42-35-8 that a license is not required because the Project is not an alteration of a major energy facility.

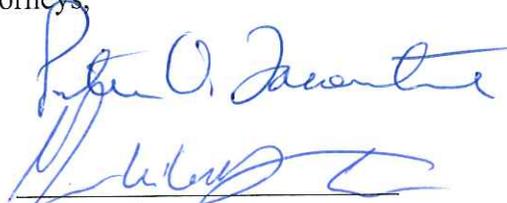
Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID

By its Attorneys,



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and Director  
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<sup>2</sup> R.I. Gen Laws § 42-98-3(b).