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May 15, 2018

Kathleen Mignanelli
Coordinator
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 Multi Station Rebuild Project)

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Dear Kathy:

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 Multi Station Rebuild Project in Providence.

Very truly yours,



George W. Watson III

Enclosure

Copy to: Patricia Lucarelli, Esq.
Leo Wold, Esq.
Jeffrey Dana, Esq.
Lori L. Hagen
Bess Gorman, Esq.

18015595-v1

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 Multi Station Rebuild Project)

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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 reconfiguration of existing segments of natural gas piping totaling 2,460 linear feet in the aggregate (the “Project”) in connection with the Allens Avenue Multi Station Rebuild Project is 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. This Project is 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 distribution system that serves the City of Providence and the Project is part of the reinforcement of that system. 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 reconfiguration of existing segments of natural gas piping totaling 2,460 linear feet in the aggregate which is part of the replacement and retirement of seven existing pressure regulating facilities at the major gas interchange. Below is a chart summarizing the diameter and length of the reconfigured segments of piping.

Pipe Diameter	Approximate Length ¹
16"	260 ft.
24"	375 ft.
16"	120 ft.
24"	60 ft.
16"	85 ft.
24"	760 ft.
16"	300 ft.
16"	200 ft.
16"	300 ft.

B. Need and Cost

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.

The Allens Avenue Multi Station Rebuild project is a multi-year project designed to replace or retire seven existing pressure regulating facilities at the major gas interchange. The work includes the abandonment and/or removal of obsolete pipe and equipment in support of the safety and reliability of the Company's distribution system at this location.

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 reconfiguration of piping at an existing natural

¹ The lengths provided are estimates, field conditions and existing infrastructure may result in minor modifications to the lengths of the piping.

gas regulator station 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.”²

4. Additional Information

Since the Project is the reconfiguration of existing piping and the project area is limited to the same location as the current piping, 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.

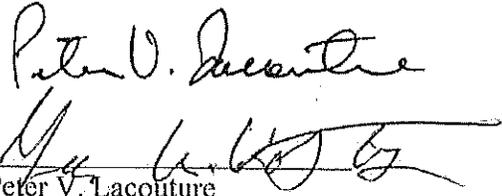
Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID

By its Attorneys,



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