

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :
d/b/a National Grid :
(GrowthPoint – Southern Rhode Island :
Growth Reinforcement Project :
West Warwick, Warwick, East Greenwich) :

Docket No. SB-2018-06

RECEIVED
2018 NOV 19 PM 4: 34
PUBLIC UTILITIES COMMISSION

Petition for Declaratory Order
The Narragansett Electric Company
d/b/a National Grid

Counsel:

Peter V. Lacouture
George W. Watson, III
Robinson & Cole LLP
One Financial Plaza
Suite 1430
Providence, RI 02903
(401) 709-3300

Bess Gorman
Assistant General Counsel and Director
National Grid USA Service Company, Inc.
40 Sylvan Road
Waltham, MA 02451-1120
(781) 907-1834

November 19, 2018

TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION	1
1. Identification of the owner(s) of the facility	2
2. Detailed description of the proposed facility	2
3. Detailed description and analysis of the impact of the Project on the physical and social environment	3
4. All studies and forecasts which demonstrate the need for the proposed facility	3
5. The reasons that the Project does not constitute the alteration of a major energy facility	3
CONCLUSION	4

INTRODUCTION

In accordance with R.I. Gen. Laws § 42-35-8, The Narragansett Electric Company d/b/a National Grid (the “Company”) hereby petitions the Rhode Island Energy Facility Siting Board (“EFSB” or “Board”) for a Declaratory Order that the proposed construction of a new gas distribution main with a maximum allowable operating pressure of 200 pounds per square inch gauge (psig) to reinforce the existing distribution system in the Company’s southern Rhode Island service territory (the “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 (“EFSB Rules”). The proposed distribution main will be installed parallel to the existing distribution main located within the limits of Route 2 in West Warwick, Warwick, and East Greenwich. Route 2 is a state highway under the jurisdiction of the Rhode Island Department of Transportation (“RIDOT”).

The Company is seeking a determination that the Project is not an alteration because the Project will not “result in a significant impact on the environment or the public health, safety and welfare.” (See EFSB Rule 1.2(d)). R.I. Gen. Laws § 42-35-8(c) requires the Board to make a determination within sixty (60) days of the filing. Since the analysis for making a determination is akin to what is outlined for electric transmission line reconductoring projects, the Company suggests following EFSB Rule 1.6(f). EFSB Rule 1.6(f) provides that projects that may result in a significant impact on the environment or the public health, safety and welfare are treated as an “alteration” and are docketed for further review as a full application. However, if the Board determines that the Project is not an alteration, the Project may proceed without further review by the Board. (See EFSB Rule 1.2(d)).

In support of this Petition, the Company is filing herewith and incorporates herein a Siting Report entitled “GrowthPoint – Southern Rhode Island Growth Reinforcement Project West Warwick, Warwick, East Greenwich (November 2018)” (the “Siting Report”). This petition follows the organization of §1.6(f) of the EFSB Rules and identifies the sections of the Siting Report where the issues identified in the EFSB Rules are discussed.

1. Identification of the owner(s) of the facility.¹

a. The owner of the facility is The Narragansett Electric Company, a Rhode Island chartered public utility, with its principal place of business at:

280 Melrose Street
Providence, RI 02907

b. The affiliates of The Narragansett Electric Company include its parent, National Grid USA and the National Grid (US) Holdings Ltd companies. The corporate relationships among the National Grid (US) Holdings Ltd companies are shown on Exhibit 1, attached. A listing of non-US affiliates is available upon request.

2. Detailed description of the proposed facility.²

The Company proposes to build a new 20-inch diameter gas distribution main measuring approximately five miles long through West Warwick, Warwick, and East Greenwich. The proposed distribution main will initially be operated at 99 psig but is designed for a maximum allowable operating pressure of 200 psig to meet future demand. Once completed, the Project will comprise approximately seven percent of the Company’s existing southern Rhode Island

¹ Rule 1.6(f)(1) requires the Applicant to provide identification of the owner(s) of the facility, including identification of all affiliates of the proposed owners, as such term is defined in R.I.G.L. §39-3-27.

² Rule 1.6(f)(2) requires the Applicant to provide a detailed description of the proposed facility, including its length, route, function and operating characteristics, and complete plans as to all structures associated with the proposed facilities.

distribution mains. The Project components are detailed in Section 3.0 of the Siting Report and the Project route is shown on Figure 2-2 of the Siting Report.

3. Detailed description and analysis of the impact of the Project on the physical and social environment.

The environmental characteristics of the Project area are described in Section 5.0 of the Siting Report and the affected social environment is discussed in Section 6.0 of the Siting Report. The impact of the Project on the natural and social environments is described in Section 7.0 of the Siting Report.

4. All studies and forecasts which demonstrate the need for the proposed facility.

The need for the Project is described in Section 2.0 of the Siting Report. The Project was included in the Company's Gas Infrastructure, Safety, and Reliability Plan FY 2019 Proposal (Revised) dated February 21, 2018 which was filed with the PUC in Docket 4781.³

5. The reasons that the Project does not constitute the alteration of a major energy facility.

The Company is submitting its Petition based on its belief that the Project does not constitute an "alteration" of a major energy facility because the reinforcement of the existing system 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." R.I. Gen. Laws § 42-98-3(b). Indeed, this proposed distribution main reinforcement is analogous to an electric reconductoring project, which the EFSB has determined is not an "alteration" of a major energy facility requiring a full application under the Energy Facility Siting Act, R.I. Gen. Laws §§ 42-98-1, *et seq.*, unless the EFSB concludes that the reconductoring project "may result in a significant impact on the environment or the public health, safety and welfare." (See EFSB Rule 1.2(d)). The installation of approximately five miles of distribution main parallel to an existing

³ The PUC approved the Company's Gas Infrastructure, Safety, and Reliability Plan FY 2019 Proposal (Revised) on March 8, 2018.

distribution main located wholly within RIDOT's Route 2 does not create significant new impacts on the environment, public health, safety or welfare.

The Project impacts are discussed in Sections 7.0 and 8.0 of the Siting Report. As summarized in Section 9.0 of the Siting Report: "[t]here are no significant long-term impacts associated with the Project." Consequently, because the Project will not significantly impact the environment or the public health, safety and welfare, the Board should determine that the Project does not constitute an alteration and is not subject to the full EFSB permitting process.

CONCLUSION

This Petition and the Siting Report, which is filed herewith and incorporated herein, clearly demonstrate that the Project will not result in significant impact on the environment or the public health, safety and welfare.

For these reasons, The Narragansett Electric Company d/b/a National Grid 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.

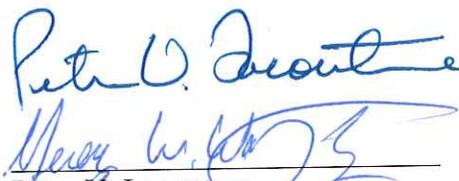
Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID

By its Attorneys,



Bess Gorman
Assistant General Counsel and Director
National Grid USA Service Company, Inc.
40 Sylvan Road
Waltham, MA 02451-1120
(781) 907-1834



Peter V. Lacouture
George W. Watson, III
Robinson & Cole LLP
One Financial Plaza
Suite 1430
Providence, RI 02903
(401) 709-3300

