

Via Hand Delivery

November 11, 2016

Todd Bianco
Siting Board Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Re: **Docket No. SB-2003-1**
In re: The Narragansett Electric Company d/b/a National Grid
(E-183 115kV Transmission Line Relocation)

Dear Todd:

I am enclosing an original and five (5) copies of the Joint Response of The Narragansett Electric Company d/b/a National Grid and City of East Providence to the Objection of the City of Providence Regarding the Establishment of an Alternate Overhead Alignment in the above referenced matter.

Please acknowledge receipt of this filing on the enclosed copy of this letter and the report and return them to me. Thank you.

Sincerely,



Peter V. Lacouture

PVL/blv

Enclosure

Copy to: Patricia S. Lucarelli, Esq. (*via hand delivery*)
W. Mark Russo, Esq. (*via hand delivery*)
Service List (*via electronic mail*)

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :
(E-183 115 kV Transmission Line : Docket No. SB-2003-01
Relocation Project – A/C I-195 Relocation) :

JOINT RESPONSE OF THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID AND THE CITY OF EAST PROVIDENCE TO THE OBJECTION
OF THE CITY OF PROVIDENCE REGARDING THE ESTABLISHMENT OF AN
ALTERNATE OVERHEAD ALIGNMENT

The Narragansett Electric Company d/b/a National Grid (“National Grid”) and the City of East Providence (“East Providence”), jointly respond to the Objection of the City of Providence (“Providence”) regarding the establishment of an alternative overhead alignment for the E-183 Transmission Line.

National Grid and East Providence submit this response pursuant to Section II-J of the Settlement Agreement dated May 25, 2004. In accordance with Section II-J, National Grid and East Providence have filed a Joint Report and Motion seeking approval of the Bridge Alignment South in accord with the terms of the Settlement Agreement.

The Joint Report and Motion was filed on October 12, 2016. In accord with Section II-J, Providence had twenty (20) days to object to the Report, which Providence did on October 31, 2016.¹ Further, in accord with Section II-J of the Settlement Agreement, National Grid may respond Providence’s Objection within ten (10) days thereafter. In accordance therewith, National Grid and East Providence submit this joint response. Thereafter, the Board is to conduct a hearing to resolve any issues or disputes that remain, and approve, modify or reject the Joint Report. *See* Section II-J of the Settlement Agreement.

Providence is correct in that all the parties have worked extremely hard to accommodate the Underground Route. However, based upon independent analysis, it does not appear to remain economically feasible. In addition, based upon independent review, there are technological risks that may drive that cost even higher or prevent the actual project from coming to fruition.

¹ The Providence Objection was e-mailed on Friday, October 28 to the parties. In the transmittal letter, Ms. Southgate's assistant advised the EFSB Coordinator that she “will be forwarding seven copies of the attached to your attention on Monday [October 31].”The Objection was file stamped as received on behalf of the EFSB on Monday, October 31.

Accordingly, National Grid and East Providence both support an alternative overhead alignment (the Bridge Alignment – South) which was envisioned by the parties to the Settlement Agreement, and which accomplishes almost all the goals set forth by the parties in the Settlement Agreement in a constructible, and economically feasible manner.

On November 2, 2016, the Attorney General filed a Response to the Joint Report and Motion. In his response, the Attorney General states “the Bridge Alignment - South Alternative presents a workable project that accomplishes most of the goals identified by the parties for the project.” AG Response, p. 4. The Attorney General notes that based on the conceptual grade estimate of the Bridge Alignment - South, “its cost is significantly less than the cost of the underground alternative.” *Id.*, pp. 4-5. Finally, the Attorney General concludes

For the aforementioned reasons, the Department believes the Bridge Alignment- South Alternative represents the most feasible, cost effective solution that accomplishes the goals of the Settlement Agreement. Based on the foregoing, the Department does not oppose the Joint Report and Motion that National Grid and East Providence have filed with the EFSB. *Id.*, p. 5

Providence has now attempted to resurrect the Underground Route by suggesting that existing bridges can be utilized as a corridor for the transmission line to cross the Providence and Seekonk Rivers. Providence has written two letters to Director Peter Alviti of the Rhode Island Department of Transportation seeking his department's view of this idea. The first letter was written during the summer of 2015 and the second on September 30, 2016. National Grid responded to the latter letter with its October 14, 2016 letter to Director Alviti, noting that the issues had been addressed in depth during the E-183 proceedings before the Public Utilities Commission in 2004.² National Grid provided a list of issues prepared by its underground transmission engineer, David Campilii, P.E., excerpts from the pre-filed testimony of Edmund T. Parker, Jr., P.E., RIDOT Chief Engineer at the time, and excerpts from the PUC's extensive advisory opinion to the Energy Facility Siting Board.

As noted in the list of issues related to the use of the bridges, in addition to the questions of (i) whether RIDOT would allow the attachment of transmission line to the Providence River and Washington Bridges, and (ii) whether structurally the bridges could support the cables, there are two additional engineering issues which National Grid or its engineering consultant would have to address: (iii) the feasibility of locating an underground cable corridor from Franklin Square through the above-ground and below-ground obstructions in the Manchester Street Station yard to the Providence River Bridge, and (iv) engineering issues related to getting the large diameter underground cables up into and off the two bridges. If the EFSB determines that a review of the bridges as a routing option should be undertaken, National Grid suggests that PDC, which conducted the independent peer review of the underground design, be engaged once again to review the feasibility of the bridges from an engineering standpoint. This would require

² The October 14, 2016 letter to Director Alviti and the attachments thereto are attached to this Response.

PDC to work with RIDOT to answer the first two questions above and with National Grid and others to resolve the last two questions.

Based on the previous assessments of the suitability of the bridges, National Grid and East Providence do not believe such a review is required. It is our feeling that the additional engineering costs and the time required for such an analysis will not change the original conclusions that the bridges are unsuitable as an E-183 underground corridor. We urge the Board to conduct a hearing pursuant to Section II-J of the Settlement Agreement and thereafter to approve the Bridge Alignment – South pursuant to the Settlement Agreement.

Respectfully Submitted,

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID

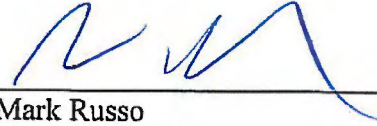
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the within was sent by e-mail to the following this the 14th day of November, 2016.

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Prenda L. Vucci