## Robinson + Cole

October 9, 2015
Todd Bianco
Siting Board Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

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Re: In re: The Narragansett Electric Company d/b/a National Grid Notice of Intent to Construct a Tap Line of Less Than 1,000 Feet (New London Avenue Substation Tap Line)

Dear Todd:
I am enclosing for filing an original and ten (10) copies of the Notice of Intent pursuant to Rule 1.6 (c) of the EFSB Rules of Practice and Procedure on behalf of The Narragansett Electric Company d/b/a National Grid for the New London Avenue Substation in Warwick.

Please acknowledge receipt of this filing on the enclosed copy of this letter and the Notice of Intent and return them to m. Thank you.


## Enclosure

Copy to: Warwick City Council
Marie T. Ahlert, Warwick City Clerk
Peter D. Ruggierio, Esq., City Solicitor
Bess Gorman, Esq.
Cynthia DeCambre, Esq.

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

In re: THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID Notice of Intent to
Construct a Tap Line of Less Than 1,000 Feet
(New London Avenue Substation Tap Line)

## NOTICE OF INTENT TO CONSTRUCT

In accordance with Rule 1.6(c) of the Rhode Island Energy Facility Siting Board ("EFSB") Rules of Practice and Procedure, The Narragansett Electric Company d/b/a National Grid ("TNEC") hereby notifies the EFSB of TNEC's intent to construct a 115 kV tap line of approximately 225 feet in length in Warwick, Rhode Island ("Project"). The Project is required for the new New London Avenue Substation (the "Substation") that will be constructed at 375 New London Avenue, Warwick, Rhode Island (Warwick Assessor's Map 253, Lot 54) (the "Property"). TNEC is the fee owner of the Property. Presently, an existing 250 foot wide transmission line right of way ("ROW") crosses the northern portion of the Property. Two 115 kV transmission lines, the T172S Line and S171S Line, and two 345 kV transmission lines, the 359 Line and 332 Line, (collectively, the "Existing Transmission Lines") are located in the ROW. The Substation will provide load relief to the area's highly utilized distribution system and address normal and contingency loading issues in the surrounding area. In order to provide clearance for the tap line, three structures supporting the Existing Transmission Lines will be replaced with taller structures and two structures will be raised. ${ }^{1}$

TNEC files this notice pursuant to EFSB Rule 1.6(c) regarding new power lines of less than 1,000 feet with a capacity of 69 kV or more. According to the EFSB's rules, the EFSB shall act upon this Notice, and any objection filed thereto, no later than forty-five days following the

[^0]filing of this Notice. The Project does not constitute an "alteration" of a major energy facility because the length of the new tap line is less than 1,000 feet. See Rule $1.2(\mathrm{~d})$.

## 1. Identification of the Owner of the Facility

The owner of the relevant facility is TNEC, a subsidiary of National Grid USA, Inc., ${ }^{2}$ with a business address of 280 Melrose Street, Providence, Rhode Island 02907. The Project will be located on the Property which is owned in fee by TNEC.

## 2. Detailed Description of the Proposed Facility

## A. Length

The Project involves the construction of a new tap line that will be approximately 225 feet in length and connect the T172S Line to the new Substation. The new tap line structure will be an approximately 40 foot tall steel three pole deadend structure ("Tap Line Structure") that will be installed near structure 225 of the T172S Line.

## B. Route

The new tap line will be supported by the Tap Line Structure and will connect to the Substation's deadend structure. Attached hereto as Exhibit B is the site plan for the Substation showing the proposed tap line and structure improvements. The site plan also shows the structure improvements to the Existing Transmission Line which are permitted by right under the EFSB Rules of Practice and Procedure:

1. Replace structure 201 of the 359 Line with a 15 foot taller structure;
2. Replace structure 225 of the T 172 Line with a 30 foot taller structure;
3. Replace structure 241 of the S171S Line with a 20 foot taller structure; and
4. Raise structures 198 and 199 of the 332 Line.
[^1]
## C. Function

The new substation is required to address growing demand for electricity in the surrounding area. Forecasted load studies show overload conditions on area distribution feeders, substation transformers and supply lines. The proposed substation will relieve these conditions as the new feeders will pick up existing load.

The estimate for the new Substation and related improvements is $\$ 18.6 \mathrm{M}$, of which approximately $\$ 732,000$ is for the tap line.

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

The Project does not constitute an "alteration" of a major energy facility. The proposed new tap line will be approximately 225 feet in length and the EFSB has expressly excluded power lines under 1,000 feet in length from the definition of "alteration" in Rule 1.2(d): "The construction, modification or relocation of a power line of 69 kV or more which are less than 1,000 feet in length shall not be treated as an alteration..."

## 4. Additional Information

The Substation was recently approved by the City of Warwick Zoning Board of Review pursuant to a decision filed with the Warwick City Clerk on July 16, 2015. In connection with the application before the Warwick Zoning Board of Review, abutters within 200 feet of the Project received notice of the local zoning hearing. In addition to the zoning proceedings, TNEC's outreach included (a) reviewing the Project with local officials on two separate occasions and (b) two open houses in the City of Warwick to review the Project with abutters.

## CONCLUSION

For the reasons stated above, TNEC respectfully requests that the EFSB enter an Order pursuant to EFSB Rule 1.6(e), accepting this Notice of Intent to Construct the new 115 kV tap line and ruling that the Project may proceed without any further review by the EFSB.

Respectfully submitted,
THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID

Byits Attorneys,
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[^2]Exhibit A


## Exhibit B




[^0]:    ${ }^{1}$ The structure improvements do not require approval from the EFSB because (i) they will not increase the normal carrying capacity of the transmission lines and (ii) the existing alignment is not changing.

[^1]:    ${ }^{2}$ A chart identifying affiliates of the owner is attached hereto as Exhibit A.

[^2]:    Bess Gorman, Assistant General Counsel (RI Bar \#8751)
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