STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

COPY

In re: The Narragansett Electric Company d/b/a National Grid (J16 115kV Transmission Line Reconductoring Project Woonsocket and Cumberland, Rhode Island)	:	Docket No. SB-2015-

Notice of Intent Application of
The Narragansett Electric Company
d/b/a National Grid

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INTRODUCTION

The Narragansett Electric Company d/b/a National Grid ("TNEC" or "Applicant"), with a principal place of business at 280 Melrose Street, Providence, Rhode Island 02907, hereby submits this Notice of Intent Application to the Energy Facility Siting Board (the "Board" or "EFSB") for approval of the reconductoring of an existing transmission line within the State of Rhode Island, pursuant to the applicable provisions of Rhode Island General Laws §§ 42-98-1, et seq. and the Board's Rules of Practice and Procedure, as amended (the "EFSB Rules").

This Application is filed by TNEC pursuant to § 1.6(f) of the EFSB Rules which provides an abbreviated review for (i) the construction of power lines of more than 1,000 feet but less than 6,000 feet or (ii) the modification or relocation of power lines. Rule 1.6(f) provides for an abbreviated application, a public hearing "in one or more of the cities or towns affected by [the] application," and a determination within sixty (60) days of the filing as to whether the project "may result in a significant impact on the environment or the public health, safety and welfare," thereby requiring a full EFSB review. (See EFSB Rules 1.6(f), (g), and (h)). If the Board does not determine that the project may result in a significant impact on the environment or the public health, safety and welfare, the project does not constitute an "alteration" and the project may proceed without further review. (See EFSB Rules 1.2(d) and 1.6(f)).

TNEC is proposing to reconductor[1] the existing J16 115 kV Transmission Line (the "J16 Line") between the Riverside Substation in Woonsocket and the Highland Park Substation in Cumberland. This portion of the J16 Line is approximately 2.2 miles long and is located in

[1] "Reconductoring" is the replacement of the conductors (wires) of an existing transmission line with new, larger conductors which are capable of carrying more power. In many cases it also involves the replacement or reinforcement of existing pole or tower structures.

Woonsocket and Cumberland. In this Application, TNEC requests the Board's approval of the reconductoring the J16 Line (the "Project").

TNEC is filing herewith and incorporates herein an Environmental Report on the Project entitled "J16 115kV Transmission Line Reconductoring Project; Woonsocket and Cumberland, Rhode Island (June, 2015)" (the "ER"). This application follows the organization of § 1.6(f) of the EFSB Rules and identifies the sections of the ER where the issues identified in the EFSB Rules are discussed.

1. Identification of the owner(s) of the facility.[2]

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.[3]

The J16 Line extends a distance of approximately 3.8 miles from the Riverside Substation in Woonsocket to the Staples Substation located off of Staples Road in Cumberland. TNEC proposes to reconductor the 2.2 mile portion of the J16 Line between the Riverside Substation and the Highland Park Substation. This portion of the J16 Line contains

[2] EFSB 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.

[3] EFSB 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.

approximately 1.6 miles of double-circuit steel lattice tower structures and 0.6 miles of steel canal structures.[4] The double-circuit steel lattice tower structures support both the J16 Line and the adjacent R9 115kV Transmission Line. The canal structures support the J16 Line and the adjacent R9 and H-17 115kV Transmission Lines as well as an unenergized sub-transmission line. The route of the line is shown on Figures 1-1 and 3-1 of the ER. In addition to replacing the existing conductors with new, larger conductors, four of the existing double-circuit steel lattice tower structures will be replaced with steel single pole double-circuit deadend structures in approximately the same location. The Project also includes the addition of one new direct embedded double-circuit steel two pole davit arm suspension structure that will be installed between structures 150 and 151. The structure replacements are necessary for strength and ground clearance for the new larger conductor. The Project is described in more detail in Section 3.0 of the ER.

3. Detailed description and analysis of the impact of the Project on the physical and social environment.[5]

The environmental characteristics of the Project area are described in Section 5.0 of the ER and the affected social environment is discussed in Section 6.0 of the ER. The impact of the Project on the natural and social environments is described in Section 7.0 of the ER. A review of current independent scientific research pertaining to electric and magnetic fields is contained in

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[4] There are the following three exceptions to the standard structures: Structure 144, which is a double-circuit steel H-frame structure; Structure 153, which is a single-circuit steel lattice tower structure; and Structure K-4, which is a special bridge structure. Figures 3-2, 3-3, and 3-4 of the ER are cross sections showing the lattice tower structures, steel canal structures, and the steel single pole double-circuit structures.

[5] EFSB Rule 1.6(f)(3) requires the Applicant to provide a "[d]etailed description and analysis of the impact of the Project on the physical and social environment. The Applicant shall also provide a review of the current independent scientific research pertaining to electromagnetic fields (EMF) and shall provide data on the anticipated levels of EMF exposure and potential health risks associated with this exposure. To the extent the proposed Project will have only negligible impact on any particular resource in the natural and social environment (e.g., geology, air quality or population) the, Applicant may so state and need not provide a detailed analysis of the baseline conditions for that resource."

the report in Appendix A of the ER. The studies relied upon for analyses of the impact of EMF on human health are listed in Section 10 (References) of Appendix A of the ER. The existing and projected levels of electric and magnetic fields at the edges of the ROW are provided in §§6.6 and 7.14 of the ER.

4. All studies and forecasts which demonstrate the need for the proposed facility.[6]

The need for the Project is described in Section 2 of the ER. The Project was included in TNEC's 2015 master construction plan which was filed with the EFSB on November 25, 2014.

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

Transmission lines of 69 kV and above are included in the definition of "major energy facilities" in Rule 1.2(p) of the EFSB Rules. However, Rule 1.2(d) states that

> the modification[7] or relocation of an existing power line shall not be an alteration unless the Board determines that the project may result in a significant impact on the environment or the public health, safety and welfare. [Emphasis supplied.]

Thus the Project would constitute the alteration of a major energy facility and be subject to the full EFSB permitting process only if the Board determines that it "may result in a significant impact on the environment or the public health, safety and welfare."

As explained in Section 3 of the ER, the Project involves reconductoring the existing J16 Line, replacing 4 of the 23 existing structures, and construction of 1 additional structure within the right-of-way.

The impacts of the Project are discussed in Section 7.0 of the ER and summarized in Section 7.1 as follows: "[i]mpacts to environmental resources and the social environment will be negligible . . ." Consequently, because the Project does not significantly impact the environment

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[6] EFSB Rule 1.6(f)(4) requires the Applicant to provide all studies and forecasts which demonstrate the need for the proposed facility under the statewide master construction plan submitted annually.

[7] Per EFSB Rule 1.2(d), modification "includes reconductoring and rebuilding an existing power line."

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 Application, the ER which is filed herewith and incorporated herein, and the other supporting material clearly demonstrate that the reconductoring of the existing J16 115 kV Transmission Line will not result in a significant impact on the environment or the public health, safety and welfare.

For the reasons stated herein, The Narragansett Electric Company d/b/a National Grid requests that the Energy Facility Siting Board approve the Project as described herein pursuant to EFSB Rule 1.6(f).

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY
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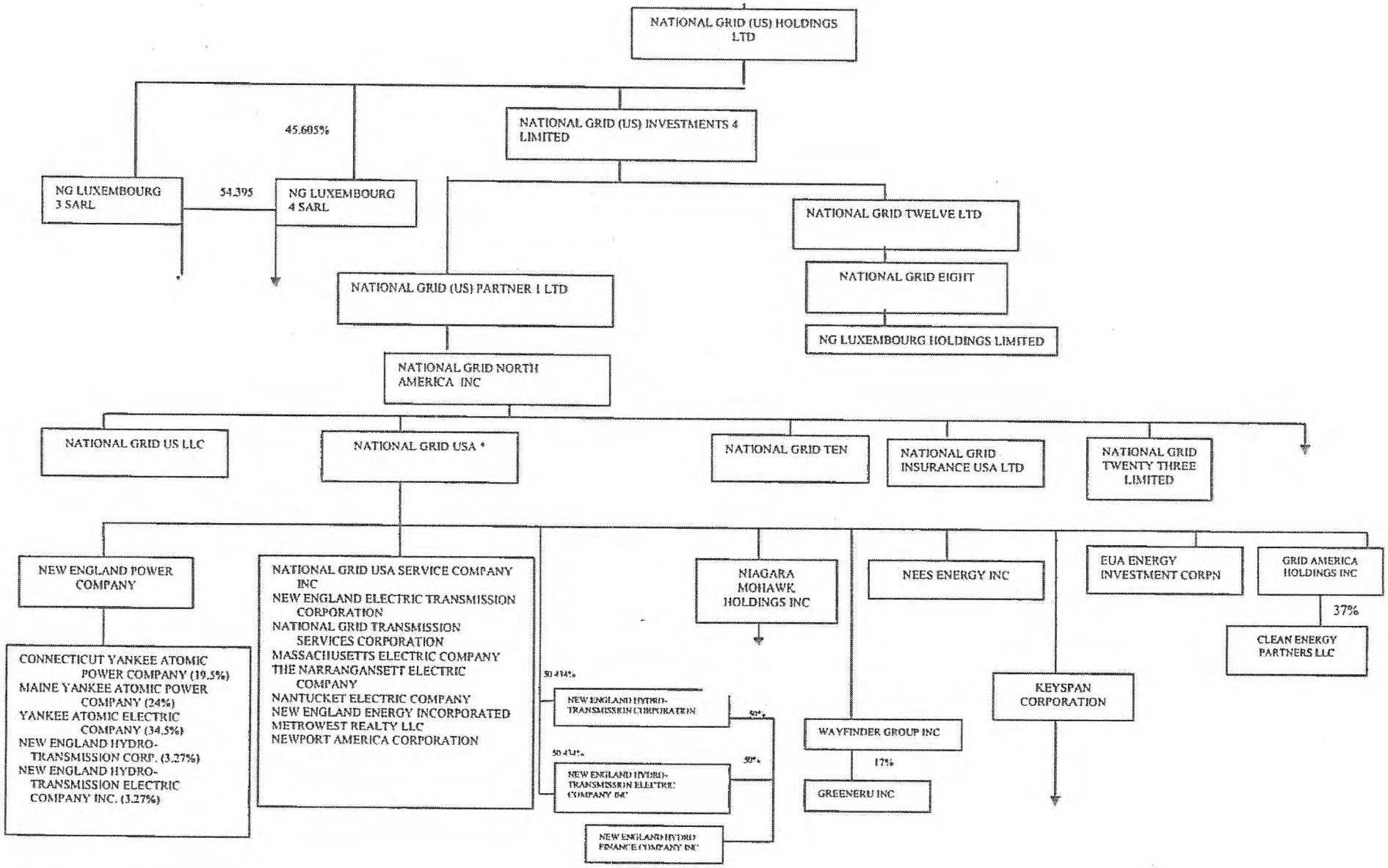
EXHIBIT 1


NATIONAL GRID (US) HOLDINGS LTD
45.605%
NATIONAL GRID (US) INVESTMENTS 4 LIMITED
NG LUXEMBOURG 3 SARL
54.395
NG LUXEMBOURG 4 SARL
NATIONAL GRID TWELVE LTD
NATIONAL GRID EIGHT
NG LUXEMBOURG HOLDINGS LIMITED
NATIONAL GRID (US) PARTNER 1 LTD
NATIONAL GRID NORTH AMERICA INC
NATIONAL GRID US LLC
NATIONAL GRID USA *
NATIONAL GRID TEN
NATIONAL GRID INSURANCE USA LTD
NATIONAL GRID TWENTY THREE LIMITED
NEW ENGLAND POWER COMPANY
CONNECTICUT YANKEE ATOMIC POWER COMPANY (19.5%)
MAINE YANKEE ATOMIC POWER COMPANY (24%)
YANKEE ATOMIC ELECTRIC COMPANY (34.5%)
NEW ENGLAND HYDRO-TRANSMISSION CORP. (3.27%)
NEW ENGLAND HYDRO-TRANSMISSION ELECTRIC COMPANY INC. (3.27%)
NATIONAL GRID USA SERVICE COMPANY INC
NEW ENGLAND ELECTRIC TRANSMISSION CORPORATION
NATIONAL GRID TRANSMISSION SERVICES CORPORATION
MASSACHUSETTS ELECTRIC COMPANY
THE NARRANGANSETT ELECTRIC COMPANY
NANTUCKET ELECTRIC COMPANY
NEW ENGLAND ENERGY INCORPORATED
METROWEST REALTY LLC
NEWPORT AMERICA CORPORATION
50.434%
NEW ENGLAND HYDRO-TRANSMISSION CORPORATION
50%
50.434%
NEW ENGLAND HYDRO-TRANSMISSION ELECTRIC COMPANY INC
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NEW ENGLAND HYDRO FINANCE COMPANY INC
NIAGARA MOHAWK HOLDINGS INC
NEES ENERGY INC
WAYFINDER GROUP INC
17%
GREENERU INC
KEYSPAN CORPORATION
EUA ENERGY INVESTMENT CORPN
GRID AMERICA HOLDINGS INC
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CLEAN ENERGY PARTNERS LLC