

**STATE OF RHODE ISLAND
ENERGY FACILITY SITING BOARD**

THE NARRAGANSETT ELECTRIC COMPANY :
NOTICE OF INTENT APPLICATION : **DOCKET NO. SB-2022-03**
L190 115 kV TRANSMISSION LINE :
ASSET CONDITION REFURBISHMENT :
PROJECT

DECISION AND ORDER

On June 17, 2022, The Narragansett Electric Company (TNEC or Company)¹ filed a Notice of Intent Application with the Energy Facility Siting Board (EFSB or Board) pursuant to Rule 1.6(F) of the Board’s Rules of Practice and Procedure (Rules).² The application proposed refurbishment of a portion of the L190 115 kV Transmission Line (L190 Line or Line) that extends approximately 14 miles and runs from the Davisville Tap in East Greenwich to the West Kingston Substation in South Kingstown and includes the taps to the Wickford Junction and the Tower Hill Substations. The portions of the Line being refurbished run through East Greenwich, North Kingstown, Exeter, and South Kingstown.

A copy of the Notice of Intent to Construct or Relocate Power Lines of More than 1,000 feet is required by 445-RICR-00-00-1.6(F) of the Rules to be filed with the Council of the

¹ In May 2022 after acquiring the assets of The Narragansett Electric Company from National Grid, PPL Holdings, LLC changed the name of The Narragansett Electric Company to Rhode Island Energy. “The Narragansett Electric Company” will be used throughout this order for consistency with the caption and signature on Notice of Intent Application.

² Rule 1.6(F) provides for an abbreviated review of an application for the construction of power lines of more than 1,000 feet, but less than 6,000 feet, or the modification or relocation of existing power lines. After the application is filed and a public hearing held in one or more of the cities or towns affected by the project, the Board must make a determination within sixty 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.” If the Board finds no significant impact, the project does not constitute an alteration of a major energy facility, and the applicant may proceed without further review.

municipality affected by the construction of said lines at least ninety days before construction is to commence. On June 17, 2022, TNEC filed the Notice of Intent with the Town Clerks in East Greenwich, North Kingstown, Exeter, and South Kingstown for distribution to the respective Town Councils within each municipality. The Rule also allows the municipality, or any intervenor, up to thirty days after the filing to file an objection with the Board. No such objections were received by the Board.

In its application, the Company described the portion of the L190 Line being refurbished as the 13 mile span between the Davisville Tap and the West Kingston Substation running parallel to the existing G185S 115 kV Transmission Line (G185S Line) that is a 795 kcmil 37-strand “Arbutus” single bundle conductor supported by roundwood pole single-circuit structures. A one mile in and out tap that is a 795 kcmil 26/7 “Drake” ACSR single bundle conductor supported by galvanized steel pole structures connects the Tower Hill Substation in North Kingstown to the L190 Line. The project traverses through a right-of-way (ROW) measuring between 125 and 300 feet wide that is either held in-fee or by easement by TNEC.

The Company engages in routine transmission planning studies done to ensure firm and reliable operation of the system as it continues to evolve and grow. TNEC concluded from a study that the L190 Line was one of its worst performing circuits due to pole deterioration, poor lightning shielding, and failure to meet current insulation standards. It noted that there had been eight operations related to incidents along the Line. TNEC provided that it designed the project to increase capacity which will address thermal overloads identified by an ISO-NE study. The project also includes a needed fiber optic path between the Kent County and West Kingston Substations. The specific components of the project are to: 1) replace approximately 146 wood pole H-frame structures and 3-pole structures with primarily weathering steel pole equivalent structures; 2)

reconductor with a new 795 kcmil “Drake” ACSS conductor; 3) replace the shield wire along portions of the route with optical ground wire; and 4) maintain and update to TNEC standards access roads, signage, and grounding.

Construction maintenance practices will be implemented to avoid or minimize environmental impacts. Prior to commencing construction, vegetation will be removed from the ROW and the ROW will be mowed. An environmental monitor will be present to supervise the activities throughout the project. Soil erosion and sediment controls will be installed to mitigate disruption to the environment and will be removed upon completion of the project. TNEC anticipates intermittent traffic during the construction period and committed to coordinating with the local municipalities and the Rhode Island Department of Transportation to develop traffic management plans for local and state streets and roads. Once construction is complete, the ROW will be restored to pre-construction conditions to the extent possible.

Construction is scheduled to occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and when necessary, between 7:00 a.m. and 5:00 p.m. on Saturdays but may be required outside of those timeframes if needed to complete certain activities. TNEC has committed to notifying landowners, abutters, municipal officials, Town Public Works, and Town Police and Fire Chiefs of all planned construction.

The Company has implemented and begun its community outreach efforts to inform and educate residents, businesses, and municipal officials of the project. Outreach includes meetings with municipalities and relevant governmental organizations, community open house events, door-to-door campaign and canvassing, a user-friendly website, a project hotline, fact sheets, door hangers, FAQs, timelines, and advertising. The Company has met with state and local officials in all four Towns to provide details about the project. TNEC anticipates the project to cost

approximately \$56.9 million. Planning for and engineering of the project began in Q2 2019; construction is expected to begin Q4 2022. Facilities are expected to be in service by Q2 2024, and the area fully restored by Q3 2023.³

Seven alternatives were considered by the Company: 1) no action, 2) a new overhead transmission route; 3) a parallel transmission line; 4) a railroad ROW route; 5) a public streets and highways route; 6) a new underground transmission route; and 7) the L190 asset condition refurbishment. The no action alternative was rejected because the Company concluded that it would not meet safety and reliability standards or be able to meet communications requirements. The new overhead transmission route alternative was rejected because it would result in significantly higher costs, the displacement of both residences and businesses, more significant environmental impacts, and substantially delay the project. The parallel transmission line route was rejected because it would require either widening the existing ROW or acquiring a new ROW.

The Company rejected the railroad ROW route because access restrictions caused by train traffic and schedules would restrict construction hours and make emergency or routine maintenance difficult. High speed trains would also pose a safety risk to construction and maintenance workers. The public streets and highways route was rejected because it would cause significant disruption to land uses and traffic, require the removal of existing overhead utilities and likely require obtaining additional easements. The Company rejected the new underground transmission route because while it would address loading requirements, it would not achieve the safety goals of the project, and would have significant cost, schedule, environmental, and operational disadvantages, including community disruption, increased time for repair, and environmental impacts resulting from river, wetland, and highway and rail crossings. Thus, the

³ During the hearing on August 10, 2022, the Company updated these time periods.

chosen alternative, as described above, was found to be superior because it would bring the L190 Line up to code and resolve condition and reliability issues.

Public hearings were held on August 9, 2022 in the Town of East Greenwich and on August 10, 2022 in the Town of South Kingstown. No member of the public appeared to offer comment at either hearing. At the public hearing in South Kingstown, the Company presented the following witnesses: 1) Nelson Antunes, Manager of the Project Management Group at TNEC and 2) Thomas Kenny, a contingent employee and Transmission Project Manager for the Company for this Project, and 3) Karen Hanecak, Environmental Project Manager with POWER Engineers.⁴ The witnesses described the project and were available to answer questions from the Board.

Mr. Kenny testified that he manages all activities related to the project which include budgeting, overseeing engineering, scheduling, outage coordination, etc. Mr. Kenny noted that the construction schedule was updated from what was originally filed to reflect a change to the date of estimated completion of construction from Q3 of 2024 to Q4 of 2024 and final restoration anticipated to be complete in Q2 2025. He explained that the changes to the schedule were due to the upgrades needed for the interconnection of the Revolution Wind project. Mr. Kenny reiterated the details set forth in the Notice of Intent and explained why the project was needed and the conditions that would occur if no action was taken. He described the route as 12.5 miles, beginning at the Davisville Tap and ending at the West Kingston substation. He noted that in addition to the 12.5 mile route a tap line of about one mile in each direction to the Tower Hill Substation and an additional 200-foot section to the Old Baptist Substation comprise the approximately 14 miles of work that need to be done to the line.⁵

⁴ Hr'g Tr. at 6-10 (Aug. 10, 2022).

⁵ *Id.* at 9-12.

Mr. Kenny testified that the L190 Line dates back to the 1960s. He provided that there are 146 wood structures being replaced with steel poles, and the conductor and optic shield wire are being replaced. He provided that Project is needed because of poor reliability and that several locations along the line do not meet current installation standards. In order to address thermal overloads identified in a ISO-NE Need Assessment, the Project was engineered with an increased capacity.⁶

Mr. Kenny testified that a number of alternatives were considered and about the reason that they were rejected. He described the construction sequence noting that construction is planned to begin in December 2022 and was expected to be completed by the last quarter of 2024 with final restoration of the ROW being complete in the second quarter of 2025. He also noted that the Company outreach has begun to educate and inform the community about the project and will include all of the abutters along the project route.⁷

Ms. Hanecak described the environmental impacts. She highlighted that all of the proposed work will occur within an existing ROW currently managed as low growth vegetation. She noted presence of 42 wetlands located within the ROW and that through a field survey, she was able to identify streams and vernal pools located within the project area. Besides these wetlands, she testified that the proposed work will cross areas identified as a sole source aquifer. Ms. Hanecak explained that temporary construction matting in wetlands, which is a best management practice, will be used during construction to not only gain access to the area but to minimize impacts to wetlands and to create safe work areas for equipment to access structural locations.⁸

⁶ *Id.* at 13-14.

⁷ *Id.* at 14-15.

⁸ *Id.* at 16-17.

While no above-ground historic resources were identified in the ROW, Ms. Hanecak noted that an archeological investigation identified 12 sites within the project corridor that the Company developed a plan to avoid. She testified that in areas where there are active sod fields, the Company will use landscape matting to minimize impacts to those locations. Landscape matting will also be used when avoidance is not possible to protect the two State-listed plant species that were identified to have the potential to occur within the ROW. She noted that the ROW will not require widening, and she does not expect any long-term impacts to the natural or social environment. She testified that soil and sedimentation control measures will be implemented and maintained over the course of the Project and an environmental monitor will be employed to ensure compliance with all permits and requirements. When asked, she opined that there will be no significant impact to the environment; impacts will only temporary and will be minimized with best management practices.⁹

On August 24, 2022, the Board conducted an Open Meeting which was properly noticed. For the reasons described below, the Board found that the project does not constitute an alteration of a major energy facility. The Company's Notice of Intent application filed pursuant to Rule 1.6(F) seeks a finding from the Board that the modification of an existing power line does not constitute an alteration requiring further review by the Board. While the proposed work is a significant modification as defined by § 42-98-4(b), the Board finds that based on the evidence presented, it will not result in significant impact to the environment or public health, safety, or welfare. The Board finds the proposed refurbishment of the entire L190 115 kV Line to be necessary due to the condition of the assets. This is a positive and necessary step in ensuring reliability to the area and in bringing the electric transmission system up to current standards.

⁹ *Id.* at 17-20.

Based on the evidence provided, the Board finds the project will not have a significant impact on the environment or public health, safety, and welfare. All of the work will occur within an existing ROW. The social and environmental impacts resulting from the construction will be temporary and minimal. The Board finds that the Company's choice of preferred alternative was carefully and thoroughly evaluated and is the least impactful to the surrounding community and environment. Moreover, the Board was assured and is confident that the Company will engage in appropriate mitigation measures to minimize any disturbances to vegetation and soil and to the social environment. Accordingly, the Board unanimously finds that the project will not cause a significant impact on the environment, public health, safety, or welfare and, thus, is not an alteration of a major energy facility. TNEC may proceed without further review.

Accordingly, it is hereby

(157) ORDERED:

The Energy Facility Siting Board finds that the project does not constitute an alteration of a major energy facility as defined by R.I. Gen. Laws § 42-98-4(b) in that it will not result in a significant impact on the environment or public health, safety, and welfare and that The Narragansett Electric Company may proceed without further review.

DATED AND EFFECTIVE AT PROVIDENCE, RHODE ISLAND ON AUGUST 24, 2022,
PURSUANT TO AN OPEN MEETING DECISION. WRITTEN ORDER ISSUED ON
SEPTEMBER 7, 2022.

ENERGY FACILITY SITING BOARD

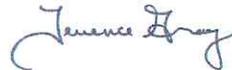


Ronald T. Gerwatowski, Chairman



Meredith Brady (Sep 7, 2022 10:56 EDT)

Meredith E. Brady, Member



Terrence Gray, Member

