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**Via Electronic Mail and Hand Delivery**

March 22, 2017

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

**Re: The Narragansett Electric Company d/b/a National Grid  
and Clear River Energy LLC  
(Burrillville Interconnection Project)**

Dear Mr. Bianco:

I am enclosing for filing on behalf of The Narragansett Electric Company d/b/a National Grid and Clear River Energy LLC seven (7) copies of an update to our filing in the above docket. The update includes the following:

- Addendum to Question 20 of the License Application; and
- Revised response to Question 21 of the License Application.

Sincerely,

  
George W. Watson III

Enclosures

Copy to: Patricia S. Lucarelli, Esq. (*w/o enclosures*)  
Leo Wold, Esq. (*via hand delivery*)  
Alan Shoer, Esq. (*via hand delivery*)  
Louise R. Phaneuf, Burrillville Town Clerk  
Michael C. Wood, Burrillville Town Manager  
William C. Dimitri, Esq., Burrillville Town Solicitor  
Bess B. Gorman, Esq., Assistant General Counsel, National Grid  
Mark R. Rielly, Esq., Senior Counsel, National Grid  
John Niland, Invenergy LLC

Energy Facility Siting Board Application  
 Burrillville Interconnection Project  
 Addendum to response to Question 20.

The chart below summarizes the relief needed from federal, state, and local boards and agencies and provides relevant citation as requested. More detailed information is provided in § 10 of the Environmental Report.

<b>Responsible Board/Agency</b>	<b>Permit/Review</b>	<b>Regulation</b>	<b>Reason needed</b>
United States Army Corps of Engineers	Individual Permit	Section 404 of the Clean Water Act	Fill discharges to waters of the United States
State Historic Preservation Office and Tribal Historic Preservation Office	Consultation	Section 106 of the National Historic Preservation Act	Work within cultural resource area boundaries
Rhode Island Energy Facility Siting Board	EFSB License	Rhode Island General Laws (R.I.G.L.) Section 42-98-1 et seq.	License to construct a major energy facility
Rhode Island Department of Environmental Management (RIDEM)	RIDEM Freshwater Wetlands Permit	R.I.G.L. Section 2-1-18 et seq.	Alteration of freshwater wetlands in connection with the construction of certain structures and access roads
RIDEM	Water Quality Certification	Section 401 of the Clean Water Act; RIDEM Water Quality Regulations	Fill discharges to waters of the United States
RIDEM	Rhode Island Pollutant Discharge Elimination System (RIPDES) Storm Water Discharge Associated With Construction Activities	Section 402 of the Clean Water Act; RIPDES Regulations	Soil disturbances exceeding one acre
Rhode Island Department of Transportation	Highway utility permit	R.I.G.L. Chapter of 8 of Title 24	Installation of wires across state highway and access from state highway during construction
Burrillville Zoning Board	Dimensional Variance	Burrillville Zoning Ordinance Section 30-111	Structures in excess of permitted maximum heights
Burrillville Planning Board	Development Plan Review	Burrillville Zoning Ordinance Section 30-201(c)(8)	Review required for all projects under the jurisdiction of the EFSB

Energy Facility Siting Board Application  
 Burrillville Interconnection Project  
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<b>Responsible Board/Agency</b>	<b>Permit/Review</b>	<b>Regulation</b>	<b>Reason needed</b>
Burrillville Zoning Board	Noise Ordinance – special use permit	Burrillville Ordinance Sections 16-35(b) and 16-48	Occasional extended work hours
Burrillville Building Inspector	Determination Of Applicability	Burrillville Ordinance Section 12-61-73	Soil disturbance and excavation exceeding 50 cubic yards

21. Where applicable, the applicant must provide evidence to show that the project conforms with the Rhode Island Energy Coordinating Council's policy statement entitled Rhode Island's Options for Electric Generation dated August, 1989, including any revisions or any successor to that document which may replace it as state policy.

The purpose of this Project is to connect the CREC to the electric system. The unique purpose of the Project means that its conformance with the Rhode Island energy policy, from a generation perspective, is shared with the power plant it is serving. CREC's conformance with the Rhode Island energy policy is summarized in Section 8.0 of the Rhode Island Energy Facility Siting Board Application Clear River Energy Center Burrillville, Rhode Island Dated October 28, 2015, EFSB Docket No. SB-2015-06 and is further described in the Advisory Opinions of the Rhode Island Office of Statewide Planning and the Rhode Island Office of Energy Resources, as filed in EFSB Docket No. SB-2015-06.

From a transmission system perspective, the Energy Coordinating Council's Rhode Island's Options for Electric Generation, dated August 1989 (the "Policy Statement"), is not applicable as the Policy Statement is focused on generation and does not include any recommendations for the transmission system. However, the more recent Rhode Island Energy Plan 2002 (State Guide Plan Element 781) dated August 8, 2002, includes a recommendation for transmission lines that is applicable to the Project. The following is from Section 03-03-05 Other Recommendations, under the Environmental Quality section of Part 781-03: Recommendations and Implementation Strategies:

As infrastructure expands to meet future needs, in particular power transmission lines and gas or petroleum pipelines, safety must be the paramount concern from siting to construction to operation. Breaches or ruptures, whether by natural events such as floods from severe storms or by human error and carelessness, must be avoided by design and practice.

Evidence of the Project's conformance with the above-referenced recommendation from the Rhode Island Energy Plan 2002 is found in ER §§ 3, 4.2, 4.3, 8.15, and 9. These sections of the ER detail the Applicant's focus on safety in the design, construction, operation, and maintenance of the proposed transmission facilities.