

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

IN RE:

THE NARRAGANSETT ELECTRIC	:	
COMPANY d/b/a NATIONAL GRID	:	
AND CLEAR RIVER ENERGY LLC	:	SB-2017-01
(BURRILLVILLE INTERCONNECTION	:	
PROJECT)	:	

**NATIONAL GRID’S RESPONSE TO THE  
THIRD SET OF DATA REQUESTS OF TOWN OF BURRILLVILLE**

REQUEST NO. DR 3-1: Provide the status of the following permits relating to the transmission interconnection:

- a. Rhode Island Department of Environmental Management (“DEM”).

RESPONSE:

The Narragansett Electric Company d/b/a National Grid (“National Grid”) and Clear River Energy LLC (“Clear River”) filed a joint Application to Alter Freshwater Wetlands with the DEM in March 2017. The application covered the proposed generating facility site as well as the transmission line interconnection rights-of-way and serves as an application for a Freshwater Wetlands Permit, Section 401 Water Quality Certificate, and a Rhode Island Pollution Discharge Elimination System (“RIPDES”) Permit. The application is still under review by DEM. The applicants are currently responding to Technical Review Comments issued by DEM dated January 29, 2018.

Response prepared by or under the supervision of  
Jamie Durand

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REQUEST NO. DR 3-1: Provide the status of the following permits relating to the transmission interconnection:

- b. Army Corps of Engineers ("ACOE").

**RESPONSE:**

National Grid and Clear River filed a joint Individual Section 404 Permit application with the U.S Army Corps of Engineers, New England District in March 2017. The application covers the proposed generating facility site and the transmission line interconnection rights-of-way. A post-application filing meeting was held with a representative of the ACOE on October 4, 2017. The ACOE has been copied on responses to the DEM Technical Review Comments, and the ACOE will continue to be copied on future responses. The joint application remains under review by the ACOE and the project team continues to communicate with the ACOE in terms of providing updated plan drawings, updated wetland impact calculations, and a draft public notice.

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**REQUEST NO. DR 3-2:** Have all the studies necessary for submission to the agencies or boards identified in No. 1 above been completed? Please furnish all completed studies and identify all uncompleted studies and the estimated completion date?

**RESPONSE:**

Yes, responses to the DEM June 19, 2017 and November 10, 2017 technical review comments, including all requested studies, were filed with the DEM on September 18, 2017 and December 11, 2017, respectively. Attachment 1 DR 3-2 contains these responses and is provided in digital format due to its large file size. The September 2017 response is presented in two volumes, and the December 2017 response is provided in one volume. The project team is currently developing responses to the most recent DEM technical review comments dated January 29, 2018. We anticipate filing our responses, including updated plan drawings, to the DEM in late the February or early March 2018 timeframe. The U.S. Army Corps of Engineers has not requested any supplemental studies.

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REQUEST NO. DR 3-3: Did DEM or ACOE ask for additional information?

- a. If yes, what is the status of the additional information? Please furnish copies.

RESPONSE:

Yes. See National Grid's responses to DR 3-1(a), DR 3-1(b) and 3-2.

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REQUEST NO. DR 3-4: If Invenergy/CREC only receives permission from the RI EFSB to construct CREC Unit 1, will the proposed transmission project be altered or modified?

- a. If yes, provide a description of the alternative for the single CREC Unit 1.

RESPONSE:

No, the proposed transmission line project would not be altered or modified if Invenergy/CREC only receives permission from the RI EFSB to construct CREC Unit 1.

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David J. Beron, P.E., P.M.P.

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REQUEST NO. DR 3-5: Has Invenergy/CREC or its consultants completed a biological inventory of the transmission interconnection corridor?

a. If yes, provide a copy of the biological inventory. If no, please describe the status of any such inventory.

RESPONSE:

National Grid completed a broad biological inventory of flora and fauna, including a desktop analysis and field reconnaissance observations, of the existing 6.0 miles of the TNEC ROW in connection with the Interstate Reliability Project (“IRP”) (Docket No. SB-2012-1), which was placed into service in the fourth quarter of 2015. TNEC representatives reviewed and updated that biological inventory for the Burrillville Interconnection Project. TNEC did not produce a separate report, but provided the results of the biological inventory in the Environmental Report filed with the EFSB (Docket No. SB-2017-01), and in the DEM and ACOE applications:

- EFSB Environmental Report - *Section 6.0* Description of Affected Natural Environment
- DEM Application - *Section 3.0* Description of Environmental Setting
  - DEM Application - *Section 3.2* Burrillville Interconnection Project
- ACOE Application - *Section 3.0* Description of Environmental Setting
  - ACOE Application - *Section 3.2* Burrillville Interconnection Project

TNEC’s consultants also performed field surveys for rare, threatened and endangered species, in consultation with the Rhode Island Natural History Survey, the Rhode Island Natural Heritage Program, and the Rhode Island Division of Fish and Wildlife.

CREC representatives completed a biological inventory and field survey of the proposed 0.8 mile CREC ROW in response to a request by the DEM to provide additional biological data.

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A summary of those biological surveys is found in the Pre-Filed Direct Testimony of Jason Ringler (June 30, 2017), and the Pre-Filed Rebuttal Testimony of Jason Ringler (September 1, 2017), both filed in Docket SB-2015-06.

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REQUEST NO. DR 3-6: Has Invenergy/CREC conducted a study on the impact of the proposed monopoles with respect to migratory birds?

- a. If yes, provide a copy of the study. If no, please describe the status of any such study.

**RESPONSE:**

National Grid conducted no such study in regard to the monopoles proposed along the existing TNEC ROW. National Grid is not aware of any such study being performed by Invenergy/CREC.

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**REQUEST NO. DR 3-7:** Provide a copy of any site-specific vegetation management plan that will regulate vegetation management along the ROW after construction.

**RESPONSE:**

National Grid’s current Five Year Vegetation Management Plan (“VMP”), dated 2014-2018, is provided as Attachment DR 3-7. This VMP also was included as Appendix B in the DEM and ACOE applications.

The VMP’s objective is to outline the procedures for managing vegetation in order to ensure safe, reliable delivery of electric service. National Grid utilizes the industry best management practice of Integrated Vegetation Management (“IVM”) to maintain its rights-of-way and has been doing so since the 1960s. This multi-faceted approach aims to minimize herbicide use and encourage low growing plant communities that are both compatible with overhead transmission corridors and in accordance with federal and state standards.

National Grid implements the VMP throughout its New England service territory. In several instances, the VMP includes references to the requirements of the Commonwealth of Massachusetts which are equal to or greater than the other New England states.

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**REQUEST NO. DR 3-8:** Provide a copy of any wetland mitigation plans submitted to DEM and/or the ACOE, whether in draft or final format.

**RESPONSE:**

The in-situ wetland mitigation measures that are to be implemented to stabilize and restore construction-related disturbances to wetlands within the ROWs, including the removal of temporary swamp mats, will comply with RI *Rhode Island Soil Erosion and Sediment Control Handbook*, the *Rhode Island Stormwater Design and Installation Standards Manual*, and the *Wetland BMP Manual: Techniques for Avoidance and Mitigation*. These mitigation measures are discussed in the ACOE and DEM applications:

- *Section 6.0* Avoidance and Minimization Statement
  - *Section 6.2* Burrillville Interconnection Project
- *Section 7.0* Proposed Project Mitigation Plan

The project team is still evaluating the best method of providing the required compensatory wetland mitigation for the project. A Final Compensatory Wetland Mitigation Plan will be prepared and submitted to the ACOE and copied to the DEM, in accordance with the U.S. Army Corps of Engineers, New England District Compensatory Mitigation Guidance dated 9/7/2016 and will be implemented if the project receives all necessary permits and approvals.

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