

**DUFFY & SWEENEY, LTD**  
BUSINESS LAW & LITIGATION

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May 13, 2024

**VIA EMAIL ONLY**

Coastal Resources Management Council  
c/o Jeff Willis, Director  
Laura Miguel, Deputy Director  
Oliver H. Stedman Government Center  
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**Re: CRMC Assent No. W2023-10-104, CRMC File No: 2023-10-104 (“Application”)**

Dear Mr. Willis and Miss Miguel,

I represent the Applicant on the above-captioned matter, which is on for hearing before the Council tomorrow, May 14, 2024. Enclosed please find a copy of the statement in support of the application that was submitted by Rhode Island Energy during our federal permitting process. While I will bring hard copies tomorrow evening, I wanted to provide you with a copy electronically in advance of the hearing.

Thank you in advance for your attention to this matter and we look forward to presenting the application tomorrow evening before the full Council.

Regards,

*/s/ Joelle C. Rocha*

Joelle C. Rocha

Enclosure

cc: Clients

Lisa Turner via email - [lturner@crmc.ri.gov](mailto:lturner@crmc.ri.gov)

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Algonquin Gas Transmission, LLC

)

Docket No. CP24-49-000

**RHODE ISLAND ENERGY’S COMMENTS IN SUPPORT OF  
THE SAKONNET RIVER REPLACEMENT PROJECT**

Pursuant to Rule 212<sup>1</sup> of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Rules of Practice and Procedure, The Narragansett Electric Company d/b/a Rhode Island Energy (“RIE”) hereby respectfully moves the Commission to accept the following comments filed out of time in the above-captioned proceeding. On January 30, 2024, Algonquin Gas Transmission, LLC (“Algonquin”) filed with the Commission a Prior Notice of Blanket Certificate Activity, for the Sakonnet River Replacement Project (“Project”). While the comment period established in the proceeding by the Commission expired April 8, 2024, good cause exists to accept the following comments despite the slight delay in their submission as they will not disrupt the proceedings, prejudice any party, or cause an additional burden. Furthermore, the comments offered herein will be of use to the Commission in its deliberations on this matter as RIE offers a perspective on the Project as a transportation customer whose service is directly impacted by the Project that is not otherwise represented in the record to date. Therefore, RIE respectfully requests that the Commission consider the following comments in support of the Project in its consideration of Algonquin’s request for authorization to construct the Project.

RIE relies on transportation from Algonquin as the single feed to provide natural gas to serve load at Aquidneck Island. Uninterrupted availability of the Algonquin facilities necessary to serve this load is critical during the winter season. As explained in Algonquin’s filings in this docket, the Project is designed to replace a segment of pipeline on which Algonquin identified several anomalies during a recent inspection. It is RIE’s understanding that the Project is necessary to maintain the safety, reliability, and integrity of Algonquin’s natural gas system and must be

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<sup>1</sup> 18 C.F.R. §358.212.

completed within Algonquin's proposed schedule to ensure deliverability of gas, including to RIE load on Aquidneck Island, during the forthcoming winter heating months. Specifically, Algonquin has advised RIE that to achieve Project completion by the end of September, mobilization for construction needs to commence within the next few weeks. Project completion by the end of September is necessary to reduce the risk to potentially impact Algonquin transportation to Aquidneck Island during the upcoming winter season when customers require natural gas for heating.

Considering Algonquin's identification of the Project as essential to maintaining the safety of its system and reliable pressures on a critically important segment of its system, RIE requests that the Commission act with expediency in this matter to complete its environmental assessment and authorize construction without disruption to Algonquin's proposed schedule. As both the completion of the Project and the timing of such completion are of critical importance to reliable natural gas service on Aquidneck Island, RIE respectfully requests that the Commission issue an order authorizing the Project to start construction as soon as possible.

Respectfully submitted,

Kelsey Colvin  
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***Counsel for The Narragansett Electric Company  
d/b/a Rhode Island Energy***

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused service of the foregoing document by email upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 19th day of April, 2024.

/s/ Kelsey A. Colvin