

June 22, 2015

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First St., N.E.
Washington, D.C. 20426

Re: Docket No. PF15-____-000
Request For Approval To Use The Pre-Filing Process
National Grid LNG, LLC
Fields Point Liquefaction Project

Dear Secretary Bose:

Pursuant to Section 157.21(b) of the Commission's Regulations, 18 C.F.R. § 157.21(b), National Grid LNG, LLC ("NGLNG") respectfully requests approval to use the Commission's pre-filing procedures for a project to add liquefaction facilities to its existing liquefied natural gas ("LNG") storage facility (called the "Fields Point Liquefaction Project" or "Project"). Upon completion of the pre-filing review, NGLNG will file an application with the Commission for authorization to construct the Project under Section 7(c) of the Natural Gas Act ("NGA"). Representatives of NGLNG met with Commission Staff in mid-May to discuss the Project and NGLNG's use of the pre-filing review process.

Project Overview

NGLNG owns and operates a Commission-jurisdictional LNG storage facility located in Providence, Rhode Island that is used by its three firm storage customers for peak-shaving. Currently, the LNG is delivered to the storage facility by tanker trucks and redelivered from storage to the customers' trucks or the LNG is vaporized and delivered to the customers at a point on the Algonquin Gas Transmission system by displacement. The Fields Point Liquefaction Project is being undertaken by NGLNG at the request of two of its storage customers to add liquefaction facilities so that they can deliver gas for storage in vapor form as an alternative to delivering LNG to the site by tanker trucks.

The Project will not modify or replace the existing LNG storage tank. NGLNG proposes to install one natural gas liquefaction train, rated at 20 mmscfd. The liquefaction system will employ an electric driven, closed loop, nitrogen refrigeration cycle process to convert natural gas, supplied by the existing gas utility infrastructure, into liquid before storing it in the existing LNG storage tank. The design of the proposed facilities and layout of the equipment will be at the site of the existing plant and will not

require the relocation of the existing cryogenic piping, storage, or vaporization equipment. To meet the needs of the customers, the project is proposed to be in service in November 2018.

In accordance with the requirements of Section 157.21(d), NGLNG submits the following information:

1. *Description of the schedule desired for the project including the expected application filing date and the desired date for Commission approval.*

To meet the customer needs to be able to fill the NGLNG storage tank utilizing an on-property natural gas line, the project is targeted to be in service by November, 2018. To meet the target in-service date, NGLNG requests that the Director of the Office of Energy Projects issue a notice approving use of the pre-filing review process in June 2015. As a result, NGLNG’s target milestones are as follows:

Pre-Filing Process Begins	June 2015
NGLNG submits Resource Reports 1 and 10	July 2015
Hold open houses	August 2015*
NGLNG submits all other Resource Reports	November 2015
Section 7(c) Certificate Application filed	February 2016
Requested Date for FERC order	September 2016
Commence construction	November 2016
Project in-service date	November 2018

* Dates to be determined in consultation with FERC staff.

This timeline will allow for receipt of any remaining applicable permits and authorizations necessary for NGLNG to begin pre-construction activities, including the orderly mobilization of contractors and materials and the resolution of any outstanding landowner issues, and allow for construction to commence as soon as feasible.

2. *For LNG terminal facilities, a description of the zoning and availability of the proposed site and marine facility location.*

The proposed Project does not involve an LNG terminal.

3. *For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, an explanation of why the prospective applicant is requesting to use the pre-filing process under this section.*

NGLNG is seeking authorization to use the pre-filing review process to provide the necessary environmental information to Commission Staff for review at the earliest practicable time in order to expedite the processing of NGLNG’s certificate application. Use of the pre-filing review process will benefit NGLNG, interested federal, state, and local agencies, and other stakeholders by:

- Assisting in the development of initial information about the Project and identifying affected parties;
 - Facilitating issue identification and resolution;
 - Providing a process that accommodates site visits, meetings with federal, state, and local agencies and stakeholders, participation in public information meetings (e.g., open houses), and the examination of alternatives;
 - Providing interested federal, state, and local agencies and stakeholders with access to draft Environmental Resource Reports and other Project-related information;
 - Minimizing the number of Commission Staff environmental data requests and subsequent filings;
 - Maintaining a coordinated schedule for a thorough environmental review; and
 - Facilitating preparation of Environmental Resource Reports and other related documents.
- 4. *A detailed description of the project, including location maps and plot plans to scale showing all major plant components that will serve as the initial discussion point for stakeholder review.***

The Fields Point Liquefaction Project will add pretreatment and liquefaction facilities on NGLNG property at the location of the existing storage facility. The plant will be fed from the existing 200 psig natural gas main that enters the site.

Upon entering the plant the gas stream will pass through a coalescing vessel/filter to remove any condensate and solids. Feed gas will then be compressed by an electric motor driven booster compressor that will require approximately 3,000 hp. The feed gas will then flow through a molecular sieve pretreatment system made up of three identical absorber vessels containing desiccant to adsorb CO₂ and water, with one tower in adsorption mode, one in cool down mode and the other in regeneration mode. The pretreatment system will contain a heater to regenerate the molecular sieve vessels that will be fueled by feed gas or heavy hydrocarbons separated from the gas stream during liquefaction.

Liquefaction will be accomplished through a single train configuration capable of producing 20 mmscfd of equivalent LNG. The required cooling for the liquefaction process will be provided by a closed loop nitrogen refrigeration cycle, which comprises multiple stages of compression and expansion processes. The refrigeration loop will be powered by an electric motor driven, multi-stage, centrifugal nitrogen recycle compressor rated at approximately 13,000 hp. All cooling for the pretreatment and liquefaction

processes will be accomplished via fin fan cooling units. There will be no water cooled exchangers or coolers requiring supply or discharge from or to the Providence River.

The new liquefaction facilities will require approximately 15 MW of electrical power.

A location map and plot plan depicting a preliminary conceptual layout of the proposed facilities are included as Attachment 1. The new liquefaction equipment will be located to the north of the truck loading/unloading station, north and west of the LNG storage tank. Electric switchgear and transformers for the new train will be located to the west of the coolers.

5. ***A list of the relevant federal and state agencies in the project area with permitting requirements, indicating (i) that the agencies are aware of the prospective applicant's intention to use the pre-filing process (including contact names and telephone numbers); (ii) whether the agencies have agreed to participate in the process; (iii) how the applicant has accounted for agency schedules for issuance of federal authorizations; (iv) when the applicant proposes to file with these agencies for their respective permits or other authorizations.***

NGLNG began contacting federal, state and municipal agencies in Rhode Island in the summer and fall of 2013 to discuss the relevant permitting requirements for the Project and advised these agencies of NGLNG's intent to use the pre-filing review process. During the first and second quarters of 2015, NGLNG subsequently held additional meetings with agencies it previously contacted, and initial meetings with those it had not initially contacted. At these meetings, the federal, state, and municipal regulatory agencies were provided with preliminary information regarding the Project, including a Project description and timeline.

A listing of the federal and state agencies with applicable environmental permit requirements along with the anticipated timing for their review is included as Attachment 2. On June 8, 2015, NGLNG informed each of these agencies by letter of NGLNG's intent to use the pre-filing process and requested each to participate in the pre-filing process. As of this date, the agencies are still considering this request. NGLNG expects those agencies to issue the applicable permits, reviews, and approvals by the time the Commission issues an order on the certificate application. Any formal comments that NGLNG receives from those agencies or mitigation plans developed in those agency proceedings will be provided to FERC staff and incorporated into the Resource Reports, as appropriate.

6. ***A list and description of the interest of other persons and organizations who have been contacted about the project.***

NGLNG began advising potential stakeholders, government officials, and other interested persons in the summer and fall of 2013 about the Project through individual

meetings. During the first and second quarters of 2015, NGLNG subsequently held additional meetings with agencies it previously contacted, and initial meetings with those it had not initially contacted. NGLNG has contacted officials at the federal, state, and local governments, including congressional delegations, state legislators, the Providence Mayor, local elected officials, and other interested stakeholder groups. A listing of persons and organizations contacted is included as Attachment 3. NGLNG will continue its ongoing efforts to identify and contact other potential stakeholders and interested persons. Updates to Attachment 3 will be submitted to Commission Staff accordingly.

7. *A description of what work has already been done, e.g., contacting stakeholders, agency consultations, project engineering, route planning, environmental and engineering contractors engagement, environmental surveys/studies, and open houses.*

Agency consultations: NGLNG initiated informal consultation with the applicable federal and state resource and permitting agencies in September 2013 and again in May 2015. NGLNG held a meeting with the Rhode Island Department of Environmental Management on May 19, 2015 and a meeting with the Rhode Island Coastal Resources Council is scheduled for June 26, 2015.

Project Engineering: NGLNG has defined the facilities required to provide the desired liquefaction capability. The facilities primarily involve one natural gas liquefaction train, rated at 20 mmscfd. The liquefaction system will employ an electric driven, closed loop, nitrogen refrigeration cycle process to convert natural gas, supplied by the existing gas utility infrastructure, into liquid before storing it in the existing LNG storage tank. Further, the Project facilities will be located within the existing LNG plant developed property with some additional temporary workspace needed during construction. The additional temporary workspace will use either NGLNG-owned property outside the existing plant fence or property owned by an affiliate. Civil surveys were conducted during project development and final surveys commenced in May 2015 and are ongoing. NGLNG anticipates installing 150,000 cubic feet of fill at the site in order to comply with 500 year flood design requirements. Project workspace configurations will be further refined, as necessary, based on input from agencies, public officials and other stakeholders, as well as information obtained from field surveys. These activities will continue throughout the pre-filing review process.

Contractor Engagement: NGLNG and its in-house engineering and environmental groups have been working with the following contractors to perform various engineering and project studies:

- Kiewit Power Constructors: Complete civil survey and assist NGLNG with project design and engineering;
- AECOM Technical Services, Inc.: Prepare Environmental Resource Reports and obtain environmental permits & clearances;

- Vanasse Hagen Brustlin, Inc.: Coastal and hydraulic modeling analysis;
- GZA Geoenvironmental, Inc.: Wetlands delineation and wetlands permitting;
- CH IV International: Provide Owner’s Engineer services; and
- Pro-Unlimited: Construction Management services.

Environmental and Cultural Surveys:

Wetland Delineation Survey Status

Delineation of wetlands has been completed for the Project site and some of the Additional Temporary Work Spaces (“ATWS”) that will be required for construction. Delineation of wetlands will be completed shortly after the finalization of the ATWS to be used by the Project.

Cultural Resource Identification Surveys

Cultural Resource Identification Surveys were completed for the Project site in 2004. These surveys will be reviewed for accuracy and the availability of more recent information and then updated. Upon finalization of the ATWS required for the Project construction cultural surveys of these locations will begin.

Next Steps: Upon approval from the Director to use the pre-filing review process, NGLNG will distribute letters to stakeholders that will include information about the FERC pre-filing review process as well as a detailed description of Project facilities and maps. NGLNG will continue to update stakeholders with mailers and will also post information on the company website.

- 8. *For LNG terminal projects, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document.***

The proposed Project does not involve an LNG terminal.

- 9. *For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, proposals for at least three prospective third-party contractors from which the Commission staff may make a selection to assist in the preparation of the requisite NEPA document, or a proposal for the submission of an applicant-prepared draft Environmental Assessment.***

On November 1, 2013, NGLNG requested proposals from ten firms believed to be capable of performing the required tasks to work as a third-party contractor. Four firms submitted proposals which were deemed complete and meeting the requirements of the request. Each proposal was found to be technically adequate and no organizational

conflicts of interests were found. NGLNG has provided Commission Staff with the three contractor proposals that NGLNG considers the best-qualified, for the Commission's consideration. Each of the firms selected have extensive experience in preparing NEPA documents, Environmental Impact Statements, and working with the Office of Energy Projects. All of the firms have staffing which is adequate for the task, and have the depth and range of staff to execute the work.

10. *Acknowledgment that a complete Environmental Report and complete application are required at the time of the filing.*

NGLNG acknowledges that a complete Environmental Report and a complete Natural Gas Act Section 7(c) certificate application are required at the time of filing the application.

11. *A description of a Public Participation Plan which identifies specific tools and actions to facilitate stakeholder communications and public information, including a project website and a single point of contact. This plan shall also describe how the applicant intends to respond to requests for information from federal and state permitting agencies.*

NGLNG has developed a comprehensive Public Participation Plan that outlines a commitment to engage actively with stakeholders throughout the life cycle of the Project and provides the steps NGLNG has identified to ensure successful ongoing communication with stakeholders, including establishing a Project website and a single point of contact. NGLNG will continue to meet with Project stakeholders to discuss the ongoing efforts associated with the Project. NGLNG's Public Participation Plan is included as Attachment 4 and further details regarding NGLNG's plan are provided below.

1. Single Point of Contact to Ensure Consistent Message

On April 24, 2015, NGLNG established a dedicated a 24 hour toll-free telephone number for the Project: 1-888-275-6326. The toll-free number will be listed in every communication made by NGLNG to affected landowners to facilitate their ability to obtain additional information in a timely manner. In addition, NGLNG has designated a spokesperson and primary contact for fielding inquiries posed by the media and other interested stakeholders.

2. Systematic Stakeholder Outreach

State, Local and Congressional Officials

Prior to notifying Project-affected landowners, the government relations specialists on the Project team contacted state, county, municipal and other local officials, state legislators, and congressional delegation members and/or their staffs to apprise them of the Project. In conjunction with those contacts, NGLNG prepared preliminary maps

and fact sheets outlining the purpose of the Project and the proposed facilities. NGLNG representatives solicited input from interested stakeholders and will utilize that feedback as the design process evolves.

In order to enable local, state and federal government officials and elected representatives to be a touchstone for their constituents and serve as advocates for their concerns, NGLNG notified various officials prior to making written notification to affected landowners. The briefings of the aforementioned officials and staffs allowed them to be informed in anticipation of possible telephone calls or emails from constituents.

State and Federal Regulatory Agencies

The Project team has endeavored to reach out to federal and state regulatory agencies. Contacts began in May 2013 and again in April and May 2015, and additional meetings are scheduled for this month. The Project environmental team will work with Commission Staff to schedule federal and state interagency meetings. As noted in Section 5 above, any formal comments that NGLNG receives from those agencies or mitigation plans developed in those agency proceedings will be provided to FERC staff and incorporated into the Resource Reports, as appropriate. Just as input from affected landowners and public officials is important in our facility design, the feedback received from regulatory agencies also will be used in a similar fashion. As with other outreach activities, NGLNG's overarching goal is to submit a comprehensive certificate application that adequately supports the need for the Project, demonstrates mitigation of the Project's impacts and is responsive to the input received during the pre-filing process.

3. Affected Landowner Outreach

NGLNG will be mailing letters, within 14 days after the initiation of the pre-filing process, to affected landowners to describe the Project and to provide information about their rights as landowners consistent with FERC's landowner outreach process. In addition, each letter will include the Project's toll-free telephone number and website address.

4. Stakeholder Communications: Newsletters, Mailings, and Website.

In order to provide current information on the Project and enable involvement by stakeholders, regular communications by mailings and/or newsletters will be provided to affected landowners as well as to public officials and other interested parties. A Project webpage will be launched by July 1, 2015. In addition to the toll-free telephone number, the website will be referenced in communications related to the Project. Generally, the website will contain Project descriptions, information on FERC's processes, Project timetables, public meeting notices including locations and answers to frequently asked questions. It also will contain hyperlinks to access NGLNG's certificate application and the PDF version of FERC's informational brochure entitled, "An Interstate Natural Gas Facility on My Land? What Do I Need to Know?" As the Project advances, notices of

open houses and opportunities for public comment as well as news articles and other timely information resources will be posted on the Project's website.

5. Informational Open Houses

Within seven days after the Director approves the use of the pre-filing review process, a proposed schedule of the open houses will be submitted to the Commission staff. As the open house dates near, the dates and locations will be disseminated to affected landowners, public officials, and other stakeholders. Print advertisements also will be placed in local newspapers. The following is a description of the format and the types of information that will be provided at the open houses:

- a. Meetings generally will be conducted from 5:30 – 7:30 p.m.; team members from various disciplines will staff information stations;
- b. Displays will include a map providing an overview of the Project as well as mounted aerial and topographical maps; there will be sign-up sheets and follow-up sheets related to individual landowner inquiries;
- c. Handouts containing Project overviews and timelines, tables of required permits, Project-specific "Frequently Asked Questions" and Project team contact information will be available; and
- d. Copies of "An Interstate Natural Gas Facility on My Land? What Do I Need to Know?"

6. FERC Site Visits and Scoping Meetings.

Public officials and affected landowners will be notified in writing by NGLNG in advance of the Commission's scoping meetings and in addition to FERC's official notifications. Letters also will contain general descriptions of the purpose of the scoping meetings. Project team members will be at the scoping meetings to provide information.

7. NGLNG's Stakeholder Outreach and Government Relations Team.

NGLNG will devote the necessary internal resources to ensure that stakeholder outreach and government relations activities are managed in a timely fashion. NGLNG's Stakeholder Outreach and Government Relations teams recognize the importance of a comprehensive outreach program and will continue to implement it throughout the Project. NGLNG's Public Participation Plan will be updated as needed and updates will be included in the monthly reports to Commission Staff.

12. *Certification that a Letter of Intent and a Preliminary WSA have been submitted to the U.S. Coast Guard or, for modifications to an existing or approved LNG terminal, that the U.S. Coast Guard did not require such information.*

The proposed Project does not involve an LNG terminal, so this provision is not applicable.

In conclusion, NGLNG believes use of the pre-filing review process will allow for active participation by interested stakeholders early on in the Project development process while maintaining a coordinated schedule throughout the review process. NGLNG is committed to identifying and resolving stakeholder issues or concerns regarding the proposed Project at the earliest practicable stage. NGLNG appreciates the assistance of Commission Staff in initiating the pre-filing review process and ensuring a thorough and timely analysis of the Project, thereby allowing NGLNG to meet the needs of its customers.

Should you have any questions concerning this request, please contact me at (781) 907-2778.

Respectfully submitted,



Anthony LaRusso
Director
National Grid