United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

MAR 7 2016

Ms. Erin Whoriskey
The Narragansett Electric Company
40 Sylvan Road
Waltham, Massachusetts 02451

Dear Ms. Whoriskey:

On December 2, 2015, the Narragansett Electric Company (TNEC) d/b/a National Grid requested two departures from 30 C.F.R. § 585.701(a)(2), which states that a Facility Design Report (FDR) must include the submission of a location plat for the proposed facilities described in the report, and that the location plat must be drawn to a scale of 1 inch equals 100 feet.

The Bureau of Ocean Energy Management (BOEM) agrees that the final location of the cable, as would be depicted on a location plat, cannot be identified prior to cable installation due to various factors, including soil, weather, and sea conditions. BOEM has determined the plan drawings that TNEC generated and submitted with the FDR, at a vertical scale of 1 inch equals 40 feet and a horizontal scale of 1 inch equals 400 feet, provide sufficient detail for the purposes of our FDR review. Therefore, BOEM has determined that the submission of a location plat at this time would not aid our review of the FDR.

Further, we agree that a location plat scale of 1 inch equals 100 feet is not appropriate for the proposed facility and would result in the reproduction of a voluminous set of plan drawings at an unreasonable size. The FDR TNEC submitted includes appropriately scaled plan drawings for the proposed facility that are sufficient for the Office of Renewable Energy Programs (OREP) technical review. Requiring the location plat at a scale of 1 inch equals 100 feet creates an unnecessarily burdensome requirement for both TNEC to produce and OREP to review without providing additional benefit for either party.

Finally, BOEM recognizes that TNEC will provide BOEM with accurate cable location information after the cable has been installed, given that:

1. TNEC will provide BOEM with post-installation survey data on the location and depth of the cable; and
2. After the cable is installed, TNEC will accurately map the cable alignment on as-built plan drawings with GPS coordinates and provide BOEM with actual distances to the nearest block lines as well as burial depths; and
3. TNEC is required to provide BOEM a Route Position List of the final as-laid position of the cable in Excel-compatible tabular format and in accordance with International Cable Protection Committee Recommendation 11, per condition 1.d of the approved General Activities Plan (GAP), no later than 45 days after the as-built plan drawings are made available.

OREP has determined that approving your departure requests is necessary to facilitate the installation activities approved in your GAP pursuant to 30 C.F.R. § 585.103(a). OREP has received sufficient cable location information to allow our FDR review to proceed, and requiring the submission of a location plat that meets the requirements of 30 C.F.R. § 585.701(a)(2) could unnecessarily lengthen our review schedule for the FDR.

Moreover, pursuant to 30 C.F.R. § 585.103(b), OREP has determined that the granting of these departure requests is consistent with subsection 8(p) of the Outer Continental Shelf Lands Act, protects the environment and the public health and safety to the same degree as if there were no approved departure, and does not impair the rights of third parties.

Accordingly, pursuant to 30 C.F.R. § 585.103, BOEM approves your departure requests and TNEC is not required to submit a location plat pursuant to 30 C.F.R. § 585.701(a)(2) as a component of its FDR.

If you have any questions you may contact Ms. Jessica Stromberg at (703) 787-1730.

Sincerely,

James F. Bennett
Program Manager
Office of Renewable Energy Programs