national**grid**

December 8, 2020

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

Re: National Grid LNG LLC, Docket No. CP16-121-000

Fields Point Liquefaction Project Certificate Extension Request

Dear Secretary Bose:

On October 17, 2018, the Commission issued the Order Issuing Certificate ("Certificate Order") granting a certificate of public convenience and necessity to National Grid LNG LLC ("National Grid") in the above captioned docket for the Fields Point Liquefaction Project (the "Project"). *National Grid LNG LLC*, 165 FERC ¶ 61,031 (2018). Ordering Paragraph (B)(1) requires construction of the facilities to be completed and made available for service within three years, which would be October, 17, 2021. National Grid respectfully requests a one-year extension of this date to October 17, 2022.

National Grid has been diligently constructing the authorized facilities, as demonstrated by the monthly status reports filed each month beginning with the November 2018 report, but the Project has encountered some unforeseen delays. The Project has experienced equipment delays, with the novel coronavirus global pandemic complicating logistics since March 2020. In addition, more recently a temporary work stoppage has been in place at the Project site to prevent the potential spread of COVID-19. Despite these delays, National Grid expects that construction of the Project will be completed within months after the current October 17, 2021 certificate deadline but that some additional time may be needed to put the facility into service. The request for a one-year extension is to provide this cushion but National Grid's objective is to complete the Project and make it available for service before the end of the requested one-year extension.

Under Section 385.2008(a) of the Commission's Regulations, 18 C.F.R. § 385.2008(a), extensions of time may be granted by the decisional authority for good cause, with a request made before the expiration of the period prescribed. The Commission has held that good cause justifying the extension of construction deadlines can be shown by a project sponsor demonstrating good faith efforts to meet its deadline but encountering unforeseen

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circumstances,¹ as National Grid has demonstrated in this docket. Accordingly, National Grid requests the Director of the Office of Energy Projects, pursuant to the delegated authority in Section 375.308(w)(4) of the Commission's Regulations, 18 C.F.R. § 375.308(w)(4), to grant National Grid a one-year extension of time to complete the authorized construction and make the facilities available for service by October 17, 2022.

If you have any questions about this submission, please contact me at 781-392-6640.

Respectfully submitted,

|s| Patrick A. Chaney

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Enclosures

cc: Service List

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¹ E.g., Algonquin Gas Transmission, LLC, 170 FERC ¶ 61,144 PP 15, 32 (2020)