

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

**In Re: INVENERGY THERMAL
DEVELOPMENT LLC'S APPLICATION
TO CONSTRUCT THE CLEAR RIVER
ENERGY CENTER POWER PLANT
IN BURRILLVILLE, RHODE ISLAND**

Docket No.: SB-2015-06

**TOWN OF CHARLESTOWN'S MOTION FOR FUNDING AS AN
AFFECTED COMMUNITY**

Now comes the Town of Charlestown ("Charlestown") and hereby respectfully moves pursuant to the R.I. General Laws, Chapter 98 of Title 42, Sub section 9.1 for funding from the applicant to perform studies of the local environmental effects of the proposed facility.

The grounds for this request is that Charlestown is now a town which is hosting a "facility for the generation of electricity" since water for the operation of the facility is proposed by the applicant to be sourced, stored, transferred and transported in the Town of Charlestown. Without a water supply the proposed plant cannot operate. Although the actual generating facility is located outside the Town of Charlestown, the water supply is inseparable from the operation of the facility – a co-dependency which constitutes by fact and necessity that Charlestown qualifies for funding under the relevant provisions of § 42-98-9.1(b).

Since gaining Intervener status, Charlestown has retained experts on several relevant subject areas to analysis and opine on the Water Supply Plan Supplement filed by the applicant. Charlestown has had to internalize the costs and expenses for these experts and legal fees due to the actions of the applicant.

WHEREFORE, for all the reasons set forth above, Charlestown respectfully prays that its Motion for Funding as an Affected Community be granted.

Respectfully submitted,
TOWN OF CHARLESTOWN
By and Through Its Attorney,

/s/ Peter D. Ruggiero
Peter D. Ruggiero (#5733)
Town Solicitor

/s/ David R. Petrarca, Jr.
David R. Petrarca, Jr. (#8140)
Assistant Town Solicitor

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Dated: November 22, 2017

CERTIFICATION

I, the undersigned, do hereby certify that I did forward a copy of the within Motion to Intervene via e-mail to all on the following service list on the 22nd day of November, 2017.

/s/ David R. Petrarca, Jr. _____