

# Schacht & McElroy

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July 17, 2017

Todd Anthony Bianco  
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Rhode Island Energy Facility Siting Board  
89 Jefferson Boulevard  
Warwick, RI 02888

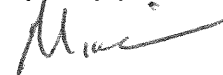
Re: Invenergy Thermal Development LLC – Clear River Energy Center  
Docket No. SB-2015-06

Dear Dr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 31<sup>st</sup> Set of Data Requests to Invenergy Thermal Development LLC. Electronic copies have been sent to the service list.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg

cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD


IN RE: INVENERGY THERMAL DEVELOPMENT LLC's :  
APPLICATION TO CONSTRUCT THE CLEAR RIVER : DOCKET No. SB-2015-06  
ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND :


**THE TOWN OF BURRILLVILLE'S 31<sup>st</sup> SET OF DATA REQUESTS TO  
INVENERGY THERMAL DEVELOPMENT LLC**

The following requests refer to Maureen Chlebek's Pre-Filed Direct Testimony, dated June 30, 2017.

- 31-1 Chlebek's Testimony acknowledges that "larger trucks will encroach into the opposing travel lane to complete the maneuver." Provide support for Invenergy's contention that it is legal for a vehicle to cross into the opposing travel lane in this manner in Rhode Island, including all relevant statutes, regulations, and ordinances.
- 31-2 Chlebek's Testimony states that throughout New England "there are numerous examples of low volume, low speed intersections with a layout that requires large sized trucks to cross into the opposing travel lane during turn maneuvers." Provide support for Invenergy's contention that it is legal for a vehicle to cross into the opposing travel lane in this manner in other New England states, including all relevant statutes, regulations, and ordinances.

Respectfully submitted,  
Town of Burrillville  
By its attorneys

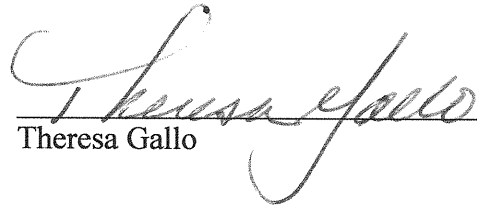
  
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Date: July 17, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of July, 2017, I sent a copy of the foregoing to the attached service list.

  
\_\_\_\_\_  
Theresa Gallo

**SB-2015-06 Invenergy CREC Service List as of 07/11/2017**

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