

# Schacht & McElroy

Michael R. McElroy  
Leah J. Donaldson

Attorneys at Law

Michael@McElroyLawOffice.com  
Leah@McElroyLawOffice.com

Members of the Rhode Island  
and Massachusetts Bars

21 Dryden Lane  
Post Office Box 6721  
Providence, RI 02940-6721

(401) 351-4100  
fax (401) 421-5696

June 26, 2017

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

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


Dear Dr. Bianco:

This office represents the Town of Burrillville.

Enclosed for filing are an original and 10 copies of the Town's Response to Invenenergy's 2<sup>nd</sup> set of data requests to the Town.

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 RESPONSE TO  
CLEAR RIVER ENERGY LLC'S (INVENERGY'S) 2<sup>nd</sup> SET OF DATA REQUESTS**

2-1 Section 30-34(e)(4) of the Burrillville Zoning Ordinance states: "When a use is permitted by special use permit, the zoning board *may grant dimensional relief in conjunction with said special use permit* if the special use could not exist without the dimensional variance." (Emphasis added.) R.I. Gen. Laws § 45-24-42(c) also states that a zoning ordinance "may provide that an applicant may apply for, and be issued, a dimensional variance *in conjunction* with a special-use permit." (Emphasis added.)

(a) Has the Town of Burrillville ("Town") granted relief in accordance with either or both of the above provisions? If the answer is yes, please identify on how many occasions the Town has granted relief since 2012?

(b) Referencing the following statement in the status report of the Building Inspector, filed with the Energy Facility Siting Board ("Board") on June 12, 2017: "Any one of these three variances required would also prove fatal to the special use permit as granting zoning use relief in conjunction with a special use permit is not allowed." Do you admit that this statement is in contravention of Section 30-34(e)(4) of the Burrillville Zoning Ordinance and R.I. Gen. Laws § 45-24-42(c) stated above?

(c) If your response to question 2-1(b) is anything other than an unqualified affirmative, thereby constituting a denial, state specifically the factual basis for such denial.

RESPONSE 2-1:

In the Newton case (*Newton v. Zoning Board of Review of City of Warwick*, 713 A.2d 239 (R.I. 1998)), the Rhode Island State Supreme Court held that a special use permit cannot be combined with a dimensional variance. By definition, dimensional relief can only be granted in conjunction with a legally permitted use of a property. The Court's decision was based on the language of the RI Zoning Enabling Act of 1991, specifically, 45-24-31(61) (b) which defined a dimensional variance as:

"permission to depart from the dimensional requirements of a zoning ordinance, where the applicant for the requested relief has shown, by evidence upon the record, that there is no other reasonable alternative way to enjoy a **legally permitted beneficial use** of the subject property unless granted the requested relief from the dimensional regulations." (R.I.G.L. § 45-24-31(61) (b)). (Emphasis added).

The Court had held that you cannot grant dimensional relief for a use requiring a special use permit specifically because a use granted by a special use permit is not a legally permitted use. It was the Court's opinion that, if the Legislature had intended to do so, they would have addressed this in their construction of the RI Zoning Enabling Act of 1991.

The State Legislature then amended the Act in 2002 by adding the following language:

“The ordinance additionally may provide that an applicant may apply for, and be issued, a dimensional variance in conjunction with a special use permit. If the special use could not exist without the dimensional variance, the zoning board of review shall consider the special use permit and the dimensional variance together to determine if granting the special use is appropriate based on both the special use criteria and the dimensional variance evidentiary standards.”

To allow the Burrillville Zoning Board to utilize this provision, the Burrillville Town Council amended the Burrillville Zoning Ordinance on May 28, 2003 by adding the following language to the Ordinance:

“When a use is permitted by special use permit, the zoning board may grant dimensional relief in conjunction with said special use permit if the special use could not exist without the dimensional variance. The zoning board of review shall consider the special use permit and the dimensional variance together to determine if granting the special use is appropriate based on both the special use criteria and the dimensional variance evidentiary standards.”

- (a) In response to question (a), the Burrillville Zoning Board has heard five zoning cases from 2012 to the present, where an applicant has requested dimensional relief in conjunction with granting a special use permit, utilizing the language in the Zoning Ordinance (30-34(e)(4)). On three occasions, the Board has granted the applications. The Board has also denied the application on one occasion and, in the case of the advisory opinion requested from the Energy Facility Siting Board relative to the Clear River Energy Center, the Zoning Board has rendered a negative opinion.
- (b) In response to question (b), I do not agree that this statement is in contravention of the Town Zoning Ordinance section 30-34(e) (4). Nor is my statement in contravention to R.I.G.L. § 45-24-42(c). I believe the author of this question is confusing dimensional relief, as in the form of a dimensional variance, which is allowed under the statute, with a use variance which is allowing a prohibited use to be created, something that is rarely, if ever, approved. In the case of a special use permit, the law is clear. If a use of a property requires a use variance to exist, it can never be approved under a special use permit. In the referenced statement from my status report, I am addressing the relationship between a use variance, or in these instances, possibly three distinct use variances, and a special use permit. The language is clear. A use variance and a special use permit are very different animals. I will assume it is the use of the word “use” that is confusing the individual directing this question.

(c) As I have referenced in my narrative above, as well as in my Advisory Opinion to the Energy Facility Siting Board and again in my status report on my Supplemental Advisory Report, the language in the RI Zoning Enabling Act of 1991, R.I.G.L. § 45-24-27 to 45-24-72, is clear. One cannot be **granted a use variance in conjunction with a special use permit** in any instance. This is not my opinion. Nor is this the basis for a determination I might be asked to render. This is a long standing fact enumerated in the language of the Enabling Legislation, in Superior and Supreme Court judgements, as well as in each and every city and town's Zoning Ordinance in the State of Rhode Island.

Prepared by: Joseph Raymond, Building Inspector

2-2 On November 2, 2016, Invenergy provided (via federal express) the Building Inspector with the Preliminary Stormwater Management Plan and Preliminary Soil Erosion and Sediment Control Plan, which were also filed with the Board on September 27, 2016.

- (a) Did the Building Inspector receive the Preliminary Stormwater Management Plan and Preliminary Soil Erosion and Sediment Control Plan?
- (b) Did the Building Inspector review the Preliminary Stormwater Management Plan and Preliminary Soil Erosion and Sediment Control Plan?

RESPONSE 2-2:

- (a) I did receive a copy of the Preliminary Stormwater Management Plan and Preliminary Soil Erosion and Sediment Control Plan in late September or early October of 2016.
- (b) While I did begin to review the preliminary plans at that time, with the suspension order from the EFSB in October for ninety days into the winter, assuming Invenergy would have ample time to continue finalizing their plans during this time period, I waited for the final plans which were anticipated to be ready for late winter/early spring to continue my review. As such, I did not submit the preliminary plan to be reviewed to the Town engineer or his designee. While the preliminary plans were not made available to the Town in time that I could include them in my advisory opinion, the plans are noted in my status report to the EFSB on my Supplemental Advisory Opinion status report.

Prepared by: Joseph Raymond, Building Inspector

2-3 On October 14, 2016, Invenergy provided (via federal express) the Building Inspector with a conceptual plan set that included proposed details for CREC and a set of plans, similar to what is anticipated in a post-licensing building permit application, for comparison with reference to another similar Invenergy Thermal Development LLC project in Lackawanna County, PA.

(a) Did the Building Inspector receive the conceptual plan set?

(b) Did the Building Inspector review the conceptual plan set?

RESPONSE 2-3:

(a) I did receive what is being labelled as “the conceptual plan set”; however, I take issue with the author of this request as to what constitutes a “conceptual plan set.”

(b) I did review what was submitted by Invenergy in October 2016. The proposed details for CREC were a one page rudimentary floor plan for an administration building, one page showing the four side elevations of the structure, and two pages showing eight wall details. Although the scale was noted on the plans, barring a reference to the size of the building being ninety feet by one hundred feet, there were no other measurements on the four pages of plans.

The three pages of plans submitted to me regarding the turbine building floor plan and the exterior elevations, as well as the sixty odd pages of plans for the administration/warehouse building for the Lackawanna Energy Center in Pennsylvania do not, in my opinion constitute “plans similar to what is anticipated in a post licensing building permit application.” The overall majority of the pages were titled “not for construction.” I would hope this is not Invenergy’s assumption; that unstamped plans developed to the “not for construction” level is adequate to get a building permit to construct a power plant in Rhode Island.

What I have stated upon numerous occasions, verbally and in writing, is that all I want is what we are entitled to and that is specified in the Rules of Practice and Procedure of the EFSB at 1.6 (b) (4) which states the following: “a detailed description of the proposed facility including its function and operating characteristics, **and complete plans as to all structures, including, where applicable, underground construction, transmission facilities, cooling systems, pollution control systems and fuel storage facilities associated with the proposed location for the project.**” From the start of my involvement with this process, I have asked for these plans but have never been given them. I have only requested one other thing. This is also stated as required, under 1.6 (b) (5), by the EFSB, and that is a “site plan for each proposed location for the project.”

It is important to note that this is also a critical requirement of procuring a Special Use Permit from the Zoning Board. Barring the Siting Act, an applicant must establish, with certainty, the exact location of the proposed use on the property for a special use (see *Hester v. Timothy*, 108 R.I. 376,275 A.2d 637 (1971)). (In some ways there are specific similarities

in the two cases. The applicants in this case were proposing to use a small portion of a large parcel of land for a use requiring a special exception.) Since March of 2016, I have been requesting that Invenenergy create a proper site plan for the lot they are proposing, for without an exact site there is no finality as to what may or may not be required. I have seen at least six iterations of the proposed site, none of which are an actual surveyed parcel of land.

Prepared by: Joseph Raymond, Building Inspector

2-4 On June 9, 2017, Invenergy provided the Building Inspector (via e-mail and federal express) with the following:

- (1) Stormwater Management and SESC drawing package (Appendix A of the Freshwater Wetlands Alteration Permit Application), that was filed with RIDEM (note: these documents supersede the preliminary plans provided in November of 2016);
- (2) A chart identifying what drawings have been revised and/or updated;
- (3) The Facility's Stormwater Management Plan (Appendix J of the Freshwater Wetlands Alteration Permit Application), which includes the Soil Erosion and Sediment Control Plan;
- (4) A courtesy copy of the revised Water Supply Plan, filed with the Board on January 11, 2017;
- (5) Revised and updated Site Arrangement and General Arrangement, prepared by HDR, Inc. dated February 16, 2017, revised April 17, 2017 (drawings 238926-0GA-C1000 – revised and 238926-0GA-C1001B – superseded by 238926-0GA-C1001C); and A list of buildings and structures, detailing our interpretation of whether a proposed building and/or structure is considered a “principal” or “accessory” structure under the Burrillville Zoning Ordinance, and our interpretation of whether the building and/or structure identified requires a height variance.

(a) Did the Building Inspector receive documents 1 through 6 above?

(b) Did the Building Inspector review documents 1 through 6 above?

RESPONSE 2-4:

- (a) I did receive a package of what is referenced here as documents 1 through 6, on June 12, 2017.
- (b) I have been in the process of reviewing these documents since I have received them. Regarding (1) and (3), the Stormwater Management and Soil Erosion and Sediment Control Plans, I have started to compare my October 2016 notes with the final plans for application to DEM. Regarding (2), the revision chart, I make note of it although I haven't compared each and every change from one page to the next. Personally, I would appreciate, instead of a list of pages, an actual list noting the changes. For example, some of the changes are as simple as page identification number changes. If that is all the change is, just stating the change versus having to review everything on these pages would save a substantial amount of time. An even better example would be the revised Site Arrangement and General Arrangement (5). These two particular





plans have changed a number of times. Listing the specific changes instead of expecting the reader to find them would be appreciated.

- (c) Regarding the list of accessory and principal structures involved in the CREC (6), I find it hard to understand that the only principal structure on the site will be the administration/control building and the other fifty or so structures on the site are all accessory structures.

Prepared by: Joseph Raymond, Building Inspector

Respectfully submitted,  
Town of Burrillville  
By its attorneys

  
William C. Dimitri, Esq. #2414  
Town Solicitor  
462 Broadway  
Providence, RI 02909-1626  
Tel: (401) 474-4370  
Fax: (401) 273-5290  
[dimitrilaw@icloud.com](mailto:dimitrilaw@icloud.com)

  
Michael R. McElroy, Esq. #2627  
Leah J. Donaldson, Esq. #7711  
Special Counsel  
21 Dryden Lane  
P.O. Box 6721  
Providence, RI 02940-6721  
Tel: (401) 351-4100  
Fax: (401) 421-5696  
[Michael@McElroyLawOffice.com](mailto:Michael@McElroyLawOffice.com)  
[Leah@McElroyLawOffice.com](mailto:Leah@McElroyLawOffice.com)

Date: June 26, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of June, 2017, I sent a copy of the foregoing to the attached service list.

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

*Burrillville/Invenergy/EFSB/Data Responses to Invenergy Set 2*

**SB-2015-06 Invenergy CREC Service List as of 06/19/2017**

Name/Address	E-mail	Phone/FAX
<b>File an original and 10 copies with EFSB:</b> Todd Bianco, Coordinator Energy Facility Siting Board 89 Jefferson Boulevard Warwick, RI 02888  Margaret Curran, Chairperson Janet Coit, Board Member Assoc. Dir., Div. of Planning Parag Agrawal Patti Lucarelli Esq., Board Counsel Susan Forcier Esq., Counsel Rayna Maguire, Asst. to the Director DEM Catherine Pitassi, Asst. to. Assoc. Dir. Plann. Margaret Hogan, Sr. Legal Counsel	<a href="mailto:Todd.Bianco@puc.ri.gov">Todd.Bianco@puc.ri.gov</a> ;	401-780-2106
	<a href="mailto:Kathleen.Mignanelli@puc.ri.gov">Kathleen.Mignanelli@puc.ri.gov</a> ;	
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a> ;	
	<a href="mailto:Margaret.Curran@puc.ri.gov">Margaret.Curran@puc.ri.gov</a> ;	
	<a href="mailto:janet.coit@dem.ri.gov">janet.coit@dem.ri.gov</a> ;	
	<a href="mailto:Catherine.Pitassi@doa.ri.gov">Catherine.Pitassi@doa.ri.gov</a> ;	
	<a href="mailto:Margaret.hogan@puc.ri.gov">Margaret.hogan@puc.ri.gov</a> ;	
	<a href="mailto:susan.forcier@dem.ri.gov">susan.forcier@dem.ri.gov</a> ;	
	<a href="mailto:rayna.maguire@dem.ri.gov">rayna.maguire@dem.ri.gov</a> ;	
	<a href="mailto:Parag.Agrawal@doa.ri.gov">Parag.Agrawal@doa.ri.gov</a> ;	
<b>Parties (Electronic Service Only, Unless by Request)</b>		
Invenergy Thermal Development LLC Alan Shoer, Esq. Richard Beretta, Esq. Elizabeth Noonan, Esq. Nicole Verdi, Esq. Adler, Pollock & Sheehan One Citizens Plaza, 8 <sup>th</sup> Floor Providence, RI 02903	<a href="mailto:ashoer@apslaw.com">ashoer@apslaw.com</a> ;	401-274-7200
	<a href="mailto:rberetta@apslaw.com">rberetta@apslaw.com</a> ;	
	<a href="mailto:enoonan@apslaw.com">enoonan@apslaw.com</a> ;	
	<a href="mailto:nverdi@apslaw.com">nverdi@apslaw.com</a> ;	
John Niland, Dir. Of Business Development Tyrone Thomas, Esq., Asst. General Counsel Mike Blazer, Esq., Chief Legal Officer Invenergy Thermal Development LLC One South Wacker Drive, Suite 1900 Chicago, IL 60600	<a href="mailto:jniland@invenergylc.com">jniland@invenergylc.com</a> ;	312-224-1400
	<a href="mailto:Tthomas@invenergylc.com">Tthomas@invenergylc.com</a> ;	
	<a href="mailto:mblazer@invenergylc.com">mblazer@invenergylc.com</a> ;	
	<a href="mailto:generalcounsel@invenergylc.com">generalcounsel@invenergylc.com</a> ;	
Town of Burrillville Michael McElroy, Esq., Special Counsel Leah Donaldson, Esq., Special Counsel Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	<a href="mailto:Michael@mcelroylawoffice.com">Michael@mcelroylawoffice.com</a> ;	401-351-4100
	<a href="mailto:leah@mcelroylawoffice.com">leah@mcelroylawoffice.com</a> ;	
	<a href="mailto:dimitrilaw@icloud.com">dimitrilaw@icloud.com</a> ;	
William Dimitri, Esq., Acting Town Solicitor		401-273-9092
Conservation Law Foundation Jerry Elmer, Esq. Max Greene, Esq. 55 Dorrance Street Providence RI, 02903	<a href="mailto:Jelmer@clf.org">Jelmer@clf.org</a> ;	401-351-1102
	<a href="mailto:Mgreene@clf.org">Mgreene@clf.org</a> ;	
Ms. Bess B. Gorman, Esq. Assistant General Counsel and Director Legal Department, National Grid	<a href="mailto:Bess.Gorman@nationalgrid.com">Bess.Gorman@nationalgrid.com</a> ;	781-907-1834

40 Sylvan Road Waltham, MA 02451 Mark Rielly, Esq. Senior Counsel	<a href="mailto:Mark.rielly@nationalgrid.com">Mark.rielly@nationalgrid.com</a> ;	
Office of Energy Resources Andrew Marcaccio, Esq. Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908  Ellen Cool Levitan & Associates	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	401-222-3417
	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ;	401-574-9100
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ; <a href="mailto:egc@levitan.com">egc@levitan.com</a> ;	
	<a href="mailto:Brenna.McCabe@doa.ri.gov">Brenna.McCabe@doa.ri.gov</a> ;	
Rhode Island Building and Construction Trades Council Gregory Mancini, Esq. Sinapi Law Associates, Ltd. 2374 Post Road, Suite 201 Warwick, RI 02886	<a href="mailto:gmancinilaw@gmail.com">gmancinilaw@gmail.com</a> ;	401-739-9690
Residents of Wallum Lake Road, Pascoag, RI Dennis Sherman and Kathryn Sherman Christian Capizzo, Esq. Shechtman Halperin Savage, LLP 1080 Main Street Pawtucket, RI 02869	<a href="mailto:ccapizzo@shslawfirm.com">ccapizzo@shslawfirm.com</a> ;	401-272-1400
	<a href="mailto:kags8943@gmail.com">kags8943@gmail.com</a> ;	
Residents of Wallum Lake Road, Pascoag, RI Paul Bolduc and Mary Bolduc Joseph Keough Jr., Esq. 41 Mendon Avenue Pawtucket, RI 02861  Paul and Mary Bolduc 915 Wallum Lake Road Pascoag, RI 02859	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
	<a href="mailto:oatyss1@verizon.net">oatyss1@verizon.net</a> ;	401-529-0367
Abutter David B. Harris Michael Sendley, Esq. 600 Putnam Pike, St. 13 Greenville, RI 02828	<a href="mailto:mSENDLEY@cox.net">mSENDLEY@cox.net</a> ;	401-349-4405
<b>Interested Persons (Electronic Service Only)</b>		
Harrisville Fire District Richard Sinapi, Esq. Joshua Xavier, Esq. 2347 Post Road, Suite 201 Warwick, RI 02886	<a href="mailto:ras@sinapilaw.com">ras@sinapilaw.com</a> ;	401-739-9690
	<a href="mailto:jdx@sinapilaw.com">jdx@sinapilaw.com</a> ;	
Residents of 945 Wallum Lake Road, Pascoag, RI (Walkers) Nicholas Gorham, Esq. P.O. Box 46 North Scituate, RI 02857	<a href="mailto:nickgorham@gorhamlaw.com">nickgorham@gorhamlaw.com</a> ;	401-647-1400
	<a href="mailto:edaigle4@gmail.com">edaigle4@gmail.com</a> ;	

Peter Nightingale, member Fossil Free Rhode Island 52 Nichols Road Kingston, RI 02881	<a href="mailto:divest@fossilfreeri.org">divest@fossilfreeri.org</a> ;	401-789-7649
Sister Mary Pendergast, RSM 99 Fillmore Street Pawtucket, RI 02860	<a href="mailto:mpendergast@mercayne.org">mpendergast@mercayne.org</a> ;	401-724-2237
Patricia J. Fontes, member Occupy Providence 57 Lawton Foster Road South Hopkinton, RI 02833	<a href="mailto:Patfontes167@gmail.com">Patfontes167@gmail.com</a> ;	401-516-7678
Burrillville Land Trust Marc Gertsacov, Esq. Law Offices of Ronald C. Markoff 144 Medway Street Providence, RI 02906	<a href="mailto:marc@ronmarkoff.com">marc@ronmarkoff.com</a> ;	401-272-9330
Paul Roselli, President Burrillville Land Trust PO Box 506 Harrisville, RI 02830	<a href="mailto:proselli@cox.net">proselli@cox.net</a> ;	401-447-1560
Rhode Island Progressive Democrats of America Andrew Aleman, Esq. 168 Elmgrove Avenue Providence, RI 02906	<a href="mailto:andrew@andrewaleman.com">andrew@andrewaleman.com</a> ;	401-429-6779
Fighting Against Natural Gas and Burrillville Against Spectra Expansion Jillian Dubois, Esq. The Law Office of Jillian Dubois 91 Friendship Street, 4 <sup>th</sup> Floor Providence, RI 02903	<a href="mailto:jillian.dubois.esq@gmail.com">jillian.dubois.esq@gmail.com</a> ;	401-274-4591
Burrillville Town Council c/o Louise Phaneuf, Town Clerk 105 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:lphaneuf@burrillville.org">lphaneuf@burrillville.org</a> ;	401-568-4300
Christine Langlois, Deputy Planner Town of Burrillville 144 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:clanglois@burrillville.org">clanglois@burrillville.org</a> ;	401-568-4300
Joseph Raymond, Building Official	<a href="mailto:jraymond@burrillville.org">jraymond@burrillville.org</a> ;	
Michael C. Wood, Town Manager Town of Burrillville 105 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:mcwood@burrillville.org">mcwood@burrillville.org</a> ;	401-568-4300 ext. 115

Mr. Leo Wold, Esq. Department of Attorney General 150 South Main Street Providence, RI 02903	<a href="mailto:LWold@riag.ri.gov">LWold@riag.ri.gov</a> ;	401-274-4400
Public Utilities Commission Cynthia Wilson Frias, Esq., Dep. Chief of Legal Alan Nault, Rate Analyst	<a href="mailto:Cynthia.Wilsonfrias@puc.ri.gov">Cynthia.Wilsonfrias@puc.ri.gov</a> ;	401-941-4500
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
Division of Public Utilities and Carriers John J. Spirito, Esq., Chief of Legal Steve Scialabba, Chief Accountant Tom Kogut, Chief of Information	<a href="mailto:john.spirito@dpuc.ri.gov">john.spirito@dpuc.ri.gov</a> ;	401-941-4500
	<a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:thomas.kogut@dpuc.ri.gov">thomas.kogut@dpuc.ri.gov</a> ;	
Matthew Jerzyk, Deputy Legal Counsel Office of the Speaker of the House State House, Room 302 Providence RI, 02903	<a href="mailto:mjerzyk@rilin.state.ri.us">mjerzyk@rilin.state.ri.us</a> ;	401-222-2466
Hon. Cale Keable, Esq., Representative of Burrillville and Glocester	<a href="mailto:Cale.keable@gmail.com">Cale.keable@gmail.com</a> ;	401-222-2258
Nick Katkevich	<a href="mailto:nkatkevich@gmail.com">nkatkevich@gmail.com</a> ;	
Avory Brookins	<a href="mailto:abrookins@ripr.org">abrookins@ripr.org</a> ;	
Joseph Bucci, Acting Administrator Highway and Bridge Maintenance Operations RI Department of Transportation	<a href="mailto:joseph.bucci@dot.ri.gov">joseph.bucci@dot.ri.gov</a> ;	
Jared Rhodes, Chief Statewide Planning Program  Jennifer Sternick Chief of Legal Services RI Department of Administration	<a href="mailto:jared.rhodes@doa.ri.gov">jared.rhodes@doa.ri.gov</a> ;	
	<a href="mailto:Jennifer.sternick@doa.ri.gov">Jennifer.sternick@doa.ri.gov</a> ;	
Doug Gablinske, Executive Director TEC-RI	<a href="mailto:doug@tecri.org">doug@tecri.org</a> ;	
Tim Faulkner ecoRI News 111 Hope Street Providence, RI 02906	<a href="mailto:tim@ecori.org">tim@ecori.org</a> ;	401-330-6276
Sally Mendzela	<a href="mailto:salgalpal@hotmail.com">salgalpal@hotmail.com</a> ;	
Keep Burrillville Beautiful Paul LeFebvre	<a href="mailto:paul@acumenriskgroup.com">paul@acumenriskgroup.com</a> ;	401-714-4493
Mark Baumer	<a href="mailto:everydayyeah@gmail.com">everydayyeah@gmail.com</a> ;	
Nisha Swinton Food & Water Watch New England	<a href="mailto:nswinton@fwwatch.org">nswinton@fwwatch.org</a> ;	
Kaitlin Kelliher	<a href="mailto:Kaitlin.kelliher@yahoo.com">Kaitlin.kelliher@yahoo.com</a> ;	
Joe Piconi, Jr.	<a href="mailto:jiggzy@hotmail.com">jiggzy@hotmail.com</a> ;	

Hon. Aaron Regunberg Representative of Providence, District 4	<a href="mailto:Aaron.regunberg@gmail.com">Aaron.regunberg@gmail.com</a> ;	
Paul Ernest	<a href="mailto:paulwernest@gmail.com">paulwernest@gmail.com</a> ;	
Skip Carlson	<a href="mailto:scarlson@metrocast.net">scarlson@metrocast.net</a> ;	
Kathryn Scaramella	<a href="mailto:kscaramella@outlook.com">kscaramella@outlook.com</a> ;	
Diana Razzano	<a href="mailto:Dlrazzano13@verizon.net">Dlrazzano13@verizon.net</a> ;	
David Goldstein	<a href="mailto:tmdgroup@yahoo.com">tmdgroup@yahoo.com</a> ;	
Douglas Jobling	<a href="mailto:djobling@cox.net">djobling@cox.net</a> ;	
Claudia Gorman	<a href="mailto:corkyhg@gmail.com">corkyhg@gmail.com</a> ;	
Curt Nordgaard	<a href="mailto:Curt.nordgaard@gmail.com">Curt.nordgaard@gmail.com</a> ;	
Colleen Joubert	<a href="mailto:Colleenj1@cox.net">Colleenj1@cox.net</a> ;	
Matt Smith Food & Water Watch	<a href="mailto:msmith@fwwatch.org">msmith@fwwatch.org</a> ;	
Christina Hoefsmit, Esq. Senior Legal Counsel RI Department of Environmental Management	<a href="mailto:Christina.hoefsmit@dem.ri.gov">Christina.hoefsmit@dem.ri.gov</a> ;	
Steven Ahlquist, RIFuture	<a href="mailto:atomicsteve@gmail.com">atomicsteve@gmail.com</a> ;	
Pascoag Utility District William Bernstein, Esq. Michael Kirkwood, General Manager Robert Ferrari, Northeast Water Solutions, Inc.	<a href="mailto:mkirkwood@pud-ri.org">mkirkwood@pud-ri.org</a> ;	
	<a href="mailto:Wlblaw7@gmail.com">Wlblaw7@gmail.com</a> ;	
	<a href="mailto:rferrari@nwsj.net">rferrari@nwsj.net</a> ;	
Ben Weilerstein Toxics Action Center	<a href="mailto:ben@toxicsaction.org">ben@toxicsaction.org</a> ;	
Russ Olivo Woonsocket Call	<a href="mailto:rolivo232@gmail.com">rolivo232@gmail.com</a> ;	
Suzanne Enser	<a href="mailto:svetromile@gmail.com">svetromile@gmail.com</a> ;	
Rhode Island Student Climate Coalition	<a href="mailto:riscc@brown.edu">riscc@brown.edu</a> ;	