

# 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

February 21, 2017

Todd Anthony Bianco  
Coordinator  
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 Mr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's Motion seeking (1) Supplementary Advisory Opinions, (2) New Advisory Opinions, and (3) Employment by the Board of Independent Expert Witnesses. 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

*Burrillville Invenergy EFSB Motion*

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD

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

**MOTION OF THE TOWN OF BURRILLVILLE SEEKING (1) SUPPLEMENTAL  
ADVISORY OPINIONS, (2) NEW ADVISORY OPINIONS, AND (3) EMPLOYMENT BY  
THE BOARD OF INDEPENDENT EXPERT WITNESSES**

**INTRODUCTION**

In light of (1) the January 11, 2017 revised water plan filed by the applicant, which proposes to redesign plant operations to reduce water, to truck water to the plant from Johnston, and to truck waste water out of the facility, and (2) the February 6, 2017 ISO-NE Forward Capacity Auction (FCA) in which the applicant failed (for a second time) to receive a Capacity Supply Obligation (CSO) for its proposed second 500 MW Unit, the Town of Burrillville (the "Town") files this Motion. The Town asks this Board to order within not more than six months following designation, (1) supplemental advisory opinions, (2) new advisory opinions, and (3) employment of independent expert witnesses at the applicant's expense to evaluate the viability and impacts of the revised water plan and to explore the issues of need, cost-justification, socio-economic impacts, and environmental impacts of the proposed facility. We understand that the Board will consider the issue of new and supplemental advisory opinions at its March 6, 2017 hearing.

**I. SUPPLEMENTAL ADVISORY OPINIONS**

**A. Various Agencies**

The Town requests that the Board order that the following advisory agencies issue supplemental advisory opinions. These supplemental opinions should review and consider in

detail the revised water plan, evaluate its viability, and determine its impacts on the responsibilities of each of the following advisory agencies:

- A. The Town Planning Board;
- B. The Town Zoning Board;
- C. The Town Building Inspector;
- D. The Town Tax Assessor;
- E. The State of Rhode Island Department of Transportation;
- F. The State of Rhode Island Department of Health;
- G. The State of Rhode Island Statewide Planning Program; and
- H. The State of Rhode Island Department of Environmental Management (“DEM”).<sup>1</sup>

All issues related to the revised water plan, including, but not limited to, the legality of the revised water plan, increased truck traffic and related risks and hazards, increased air pollution from the truck traffic, increased noise from the truck traffic, and proposed changes in the operation of the proposed energy facility to reduce the volume of water used shall be considered.

#### **B. Statewide Planning Program**

The Town also requests that the Statewide Planning Program be directed to issue a supplemental advisory opinion addressing the seven (7) elements of the State Guide Plan which were not considered in its previous advisory opinion:

- 1. The Rivers Policy and Classification Plan;
- 2. The Non Point Source Management Plan;

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<sup>1</sup> The applicant should also be required to promptly provide to DEM (1) the “site-specific information” DEM said it needed regarding biodiversity and conservation value, as set forth on page 12 of its advisory opinion, and (2) the “survey and analysis of environmental impacts, including wildlife and plant community impacts” DEM said it needed on page 22 of its advisory opinion. DEM should be directed to utilize this site-specific information, survey, and analysis in rendering its supplemental advisory opinion.

3. The Blackstone Region Water Resources Plan;
4. The Forest Resources Management Plan;
5. The Urban and Community Forest Plan;
6. Ocean State Outdoors: Rhode Island's Comprehensive Recreation Plan; and
7. A Greener Path: Green Space and Greenway's Plan for Rhode Island's Future.

To date, no review has been conducted by the Statewide Planning Program of these seven (7) critical elements of the State Guide Plan. Therefore, there has been no assessment by the Statewide Planning Program regarding the consistency of the proposed power plant with state policies concerning such matters as forest resources, outdoor recreation, biodiversity, rivers, or greenways. This omission renders the opinion incomplete and should be corrected in a supplemental advisory opinion issued simultaneously with the Statewide Planning Program's evaluation of the revised water plan.

### **C. Public Utilities Commission**

The Town also requests that the Board seek a supplemental advisory opinion from the Public Utilities Commission on the critical issues of need and cost-justification, especially in light of (1) the recently-revealed increase in the estimated cost of the facility from \$700 million to \$1 billion, and (2) the results of the recent ISO-NE forward capacity auction in which the applicant failed for a second time in two (2) years to obtain a Capacity Supply Obligation from ISO-NE for its second 500 MW unit.

Under R.I.G.L. § 42-98-2(2), construction of new major energy facilities "shall only be undertaken when those actions are justified by long term state and/or regional energy need forecasts." Under R.I.G.L. § 42-98-11(b)(1), a license may only be issued by this Board if the applicant demonstrates the facility "is necessary to meet the needs of the state and/or region."

Under R.I.G.L. § 42-98-11(b)(3), the applicant must also demonstrate that “the proposed facility will not cause unacceptable harm to the environment and will enhance the socio-economic fabric of the state.”

Moreover, under R.I.G.L. § 42-98-2(3), it must be demonstrated by the applicant, (which has the burden of proof) that the energy will be “produced at the least possible cost to the consumer” and that the facility “shall produce the fewest possible adverse effects on the quality of the state’s environment; most particularly, its land and its wildlife and resources, the health and safety of its citizens, the purity of its air and water, its aquatic and marine life and its esthetic and recreational value to the public.” Under R.I.G.L. § 42-98-11(b)(2), a license may not be issued unless the applicant demonstrates that the proposed facility “is cost-justified, and can be expected to produce energy at the lowest reasonable cost to the consumer . . .”

In recent weeks, two major developments have occurred. First, Invenenergy has disclosed that its original \$700 million cost estimate for this facility has grown to approximately \$1 billion. The information in the application submitted to date deals only with the approximate \$700 million cost. R.I.G.L. § 42-98-8(a)(5) requires that the application contain “complete detail as to the estimated construction cost of the proposed facility . . .” At present, there is nothing in the application that itemizes the dramatic 43% increase in construction costs from \$700 million to \$1 billion. This issue should be fully explored in a supplemental advisory opinion by the Public Utilities Commission, which has been charged with determining whether the proposed facility is needed and is cost-justified.

Moreover, in ISO-NE’s annual capacity auction conducted on February 6, 2017 (FCA-11), ISO-NE obtained sufficient resources to fully meet anticipated demand for the year 2020 – 2021 **without awarding a Capacity Supply Obligation to any proposed new fossil-fired facilities in**

**New England.** The auction closed at a clearing price of \$5.30 per kilowatt-month, significantly less than \$7.03 per kilowatt-month in the FCA-10, and much less than \$17.73 per kilowatt month in FCA-9. New energy-efficiency and demand-reduction measures totaling 640 MW (essentially the equivalent of a large power plant), cleared the auction and will be available in 2020 – 2021. All known retirements are built into the ISO-NE auction process.

The Town believes that the results of this auction demonstrate that Invenenergy’s proposed power plant is not needed. This auction has taken into account all power plants that will retire between now and 2020. The zone that includes Rhode Island cleared this auction with a **surplus of 1,926 megawatts**. Therefore, even if the applicant’s existing Capacity Supply Obligation of 485 MW is deducted, that still leaves a capacity surplus of 1,441 megawatts in the zone that includes Rhode Island. Accordingly, it is the Town’s firm belief that the most recent ISO-NE auction (FCA-11) demonstrates beyond question that there is no need for this proposed facility in Rhode Island or the region.

We understand that the applicant may disagree. This is why we propose that the Board require the Public Utilities Commission to consider this new evidence of lack of need for the facility, together with the new evidence of the dramatic cost increase for this facility, at public evidentiary hearings and issue a supplemental advisory opinion to the Board.

#### **D. Office of Energy Resources (“OER”)**

Since the time OER issued its advisory opinion in September, 2016, the Executive Climate Change Coordinating Council (EC4) issued its “Rhode Island Greenhouse Gas Emissions Reduction Plan December 2016,” in accordance with the provisions of the Resilient Rhode Island Act, R.I.G.L. § 42-6.2-1 et seq. We ask that OER be directed to issue a supplemental advisory opinion, which takes into account this important and extensive report.

### **E. Other Agencies**

To the extent other advisory agencies were unable to fully render opinions due to a lack of information from the applicant, as described in detail in the Motion to Dismiss papers filed by the Conservation Law Foundation, which we will not repeat here, we request that the Board direct the applicant to promptly provide such information as is necessary for each such advisory agency to render supplemental opinions addressing each area within the responsibility of each agency that they were unable to previously address due to lack of information.

### **II. NEW ADVISORY OPINIONS**

The Town also requests that new advisory opinions be requested from the following:

#### **A. Johnston, Smithfield, and Gloucester**

1. The Town of Johnston Planning Board and Tax Assessor.
2. The Town of Smithfield Planning Board and Tax Assessor.
3. The Town of Gloucester Planning Board and Tax Assessor.

The revised water plan shows that the proposed tanker truck route will traverse the Towns of Johnston, Smithfield, and Gloucester (as well as Burrillville). We request that the Board seek advisory opinions from the Planning Boards of these Towns regarding any adverse impact this revised water plan may have on these Towns, including whether this revised water plan is consistent with their comprehensive plans. This Board should also ask the Tax Assessors of these Towns to issue advisory opinions as to whether the anticipated tanker truck traffic on the roads in these Towns, with the attendant noise, diesel air pollution, and truck hazards (accidents, spills, etc.) will have an adverse effect on property values within each Town, especially along the truck route.

## **B. Providence Water Supply Board and the Water Resources Board**

The Town also requests that new advisory opinions be requested by the Board from:

1. The Providence Water Supply Board.
2. The Rhode Island Water Resources Board.

These Boards should be directed to evaluate the revised water plan and advise this Board regarding whether the revised water plan has any impacts on the statutory responsibilities, long-term goals and water supply plans of the Providence Water Supply Board and the Water Resources Board.

## **III. INDEPENDENT EXPERTS**

The Town also asks that this Board retain independent experts to evaluate the revised water plan and provide expert opinions to the Board that can then be examined by all parties.

R.I.G.L. § 42-98-17(a) authorizes this Board to “employ . . . engineers . . . and expert witnesses” in connection with any hearing. Moreover, Rule 1.12(g) of this Board’s Rules states:

“Board Witness – Notwithstanding the requirements for prefiled written direct testimony, the board shall have the right to call and examine any witness at any time which may assist the Board in rendering its final decision.”<sup>2</sup>

Rule 1.21(a) states that the applicant “shall be charged with and shall pay the expenses reasonably incurred by the Board . . . for hearing and investigation relating to the applicant’s application.” Rule 1.21(b) makes specific reference to the payment of expenses by the applicant of “. . . the Board’s best estimate of expenses to be incurred for . . . engineers, chemists, . . . expert witnesses . . . .”

The revised water plan is a complex document that needs a thorough evaluation by a skilled, independent expert. An expert should determine whether or not the revised water plan is

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<sup>2</sup> This Rule is similar to the independent expert witness Rule 706 of the Rhode Island and Federal Rules of Civil Procedure.







a viable plan, both from an engineering standpoint (e.g. can water use really be reduced so dramatically?) as well as from the standpoint of all impacts the revised water plan may have on the affected communities.

The Town also requests that independent experts be retained by the Board to evaluate (1) the need for the project in light of the recent ISO-NE auction result rejecting the second unit, (2) the cost-justification for the proposed plant in light of the increase in cost from \$700 million to \$1 billion, (3) the expected socio-economic impacts of the plant, and (4) the expected environmental impacts of the plant.

The Town respectfully submits that the hiring of independent expert witnesses to independently evaluate these matters would be the best way for the Board to meet its statutory responsibility to fully and fairly evaluate the application for this proposed facility, which if built would have a lasting impact on Rhode Island and especially on the Town of Burrillville and its citizens.

Respectfully submitted,  
Town of Burrillville  
By its attorneys

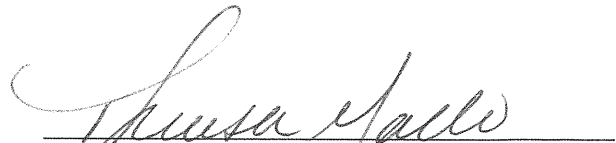
  
William C. Dimitri, Esq. #2414   
Town Solicitor  
462 Broadway  
Providence, RI 02909-1626  
Tel: (401) 474-4370  
Fax: (401) 273-5290  
Fax: (401) 273-5290  
[bill@dimitrilaw.com](mailto:bill@dimitrilaw.com)

  
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: February 21, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of February, 2017, I sent a copy of the foregoing to the attached service list.

  
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Theresa Gallo

*Burrilville Invenegy EFSB Motion*

**SB-2015-06 Invenergy CREC Service List as of 02/13/2017**

Name/Address	E-mail	Phone/FAX
<p><b>File an original and 10 copies with EFSB:</b>            Todd Bianco, Coordinator            Energy Facility Siting Board            89 Jefferson Boulevard            Warwick, RI 02888</p> <p>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.</p>	<a href="mailto:Todd.Bianco@puc.ri.gov">Todd.Bianco@puc.ri.gov</a> ;	401-780-2106
	<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: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> ;	
<p><b>Parties (Electronic Service Only, Unless by Request)</b></p>		
<p>Invenergy Thermal Development LLC            Alan Shoer, Esq.            Richard Beretta, Esq.            Elizabeth Noonan, Esq.            Nicole Verdi, Esq.            Adler, Pollock &amp; Sheehan            One Citizens Plaza, 8<sup>th</sup> Floor            Providence, RI 02903</p>	<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> ;	
	<a href="mailto:jniland@invenergylc.com">jniland@invenergylc.com</a> ;	
<p>John Niland, Dir. Of Business Development            Tyrone Thomas, Esq., Asst. General Counsel            Invenergy Thermal Development LLC            One South Wacker Drive, Suite 1900            Chicago, IL 60600</p>	<a href="mailto:Tthomas@invenergylc.com">Tthomas@invenergylc.com</a> ;	
<p>Town of Burrillville            Michael McElroy, Esq., Special Counsel            Leah Donaldson, Esq., Special Counsel            Schacht &amp; McElroy            PO Box 6721            Providence, RI 02940-6721</p>	<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> ;	
<p>William Dimitri, Esq., Acting Town Solicitor</p>		
<p>Conservation Law Foundation            Jerry Elmer, Esq.            Max Greene, Esq.            55 Dorrance Street            Providence RI, 02903</p>	<a href="mailto:Jelmer@clf.org">Jelmer@clf.org</a> ;	401-351-1102
	<a href="mailto:Mgreene@clf.org">Mgreene@clf.org</a> ;	
<p>Ms. Bess B. Gorman, Esq.            Assistant General Counsel and Director            Legal Department, National Grid</p>	<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:oatyssl@verizon.net">oatyssl@verizon.net</a> ;	401-529-0367
Abutton 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:proseli@cox.net">proseli@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
Thomas J. Kravitz, Town Planner Christine Langlois, Deputy Planner Town of Burrillville 144 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:tkravitz@burrillville.org">tkravitz@burrillville.org</a> ; <a href="mailto:clanglois@burrillville.org">clanglois@burrillville.org</a> ; <a href="mailto:jraymond@burrillville.org">jraymond@burrillville.org</a> ;	401-568-4300
Joseph Raymond, Building Official		
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> ;	
Ambar Espinoza	<a href="mailto:aespinoza@ripr.org">aespinoza@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
Robert Tormey Conanicut Energy, LLC	<a href="mailto:rjtormey@conanicutenergy.com">rjtormey@conanicutenergy.com</a> ;	617-306-1601
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@nwsinc.net">rferrari@nwsinc.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> ;	
Celine Schmidt	<a href="mailto:celine_schmidt@brown.edu">celine_schmidt@brown.edu</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> ;	