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January 30, 2017

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

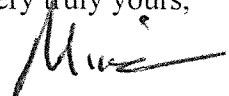
Re: Invenergy Thermal Development LLC – Clear River Energy Center
Docket No. SB-2015-06

Dear Dr. Bianco:

This office represents the Town of Burrillville in this docket. Enclosed for filing in this matter are an original and ten (10) copies of a Motion to Postpone the February 6, 2017 EFSB Hearing. Electronic copies have been sent to the service list.

If you need any further information, please do not hesitate to contact me.

Very truly yours,


Michael R. McElroy

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 Energy : Docket No. SB-2015-06
Center in Burrillville, Rhode Island :

**THE TOWN OF BURRILLVILLE'S MOTION TO
POSTPONE THE FEBRUARY 6, 2017 EFSB HEARING**

The Town of Burrillville ("Town"), an intervenor as of right in this docket, hereby requests that the Energy Facility Siting Board ("EFSB") postpone for 45 days the EFSB Hearing scheduled for Monday, February 6, 2017 on the pending Motions to Dismiss. The Town requests this extension in order to have adequate time to have its experts meaningfully review, evaluate, and provide input to the EFSB on the revised Water Supply Plan ("Plan") filed by Invenergy on January 11, 2017.

I. BACKGROUND

On October 29, 2015, Invenergy Thermal Development LLC's ("Invenergy") filed its Application to Construct the Clear River Energy Center ("Application"), a natural gas/oil-fired electric generating facility of up to 1,000 MW in Burrillville, Rhode Island.¹ The EFSB requested that several entities in the Town render Advisory Opinions as to the proposed facility's impact on the Town, its residents, and its environment.² The Town and its Entities spent significant time evaluating Invenergy's Application, as well as great sums of money on expert consultants to do likewise.³

¹ Only the first unit (485 MW) has been approved by ISO-NE thus far.

² In its Preliminary Decision and Order, the EFSB directed the following Town entities to render Advisory Opinions regarding Invenergy's Application: (a) Burrillville Zoning Board of Review, (b) Burrillville Building Inspector, (c) Burrillville Planning Board, and (d) Burrillville Tax Assessor (collectively "Entities").

³ The deadline for filing all of the Advisory Opinions was September 12, 2016.

An electric generating facility cannot operate without a sufficient water supply. However, Invenergy lost its originally proposed water source in August 2016. On September 9, 2016, Invenergy filed a motion seeking an extension of the deadlines in the EFSB Procedural Schedule. As grounds for its request, Invenergy reported it expected to have an alternative water supply secured and “available for review within the coming weeks.” Invenergy requested a 30-day extension to “provide all parties with enough time to review and comment on Invenergy’s alternative water supply plans.” The 30-day extension was granted on September 20, 2016.

On October 4, 2016, the EFSB issued a Show Cause Order requiring Invenergy to appear and show cause why the licensing proceedings should not be suspended. The Show Cause Order stated in part: “The lack of information regarding Invenergy’s water supply renders its application incomplete and therefore not in compliance with Rule 1.6(b)(4) of the Rules of Practice and Procedure.” Following a hearing on October 13, 2016, the EFSB suspended the proceedings for 90 days to allow Invenergy time to supplement its Application with a new water supply source.

On January 11, 2017, the last day of the suspension period, Invenergy filed its revised Water Supply Plan.⁴

II. LEGAL STANDARD

EFSB Rule 1.17(a) provides that “any application to the board to take any action or to enter any order after commencement of a proceeding ... shall be made in writing, shall be filed with the Coordinator, shall specifically state the grounds therefor, shall set forth the action or order sought, and shall be served upon all persons entitled thereto under these rules.”

⁴ The revised Water Supply Plan, with appendices, is over 80 pages long.

EFSB Rule 1.6(b)(11) requires all applications filed with the EFSB to include “[w]here applicable, required support facilities, e.g. road, gas, electric, *water*, telephone, and an *analysis of the availability of the facilities and/or resources to the project.*” (Emphasis added.)⁵

It is well settled in Rhode Island “that due process in administrative procedures requires the opportunity to be heard ‘at a meaningful time and in a meaningful manner.’” *Millett v. Hoisting Engineers’ Licensing Division of Dept. of Labor*, 377 A.2d 229, 236 (R.I. 1977) (quoting *Raper v. Lucey*, 488 F.2d 748, 753 (1st Cir. 1973)).

III. ARGUMENT

After a four-month delay, Invenergy finally provided its revised Water Supply Plan. The revised Plan differs greatly from the water plan in the original Application, as more fully discussed below. It is currently unclear how and to what extent the revised operating processes, as proposed, would affect the data provided in the original Application and data responses previously provided by Invenergy.

Further, it is uncertain how such changes will impact the Town and its residents. Simultaneous to this Motion, the Town submitted over 50 data requests to Invenergy to explore these issues. (See attached Exhibit A.) A significant change in one operating process (such as Invenergy’s proposed reduction in water use) could well impact other operating processes and facility impacts outlined in the Application. We will not know until Invenergy responds to the Town’s data requests and the Town’s experts review those responses.

The Town intends to supplement its Motion to Dismiss to address issues raised by the revised Plan. The Town needs adequate time to retain appropriate experts to review the revised

⁵ Moreover, R.I.G.L. §42-98-2(8)(iii) of the Energy Facility Siting Act (“Act”) requires the EFSB to review water supply information for any energy generation project in order to determine whether certain criteria are met.

Plan⁶, formulate and submit data requests to Invenergy, receive responses from Invenergy⁷, evaluate those answers with its experts, and then supplement its Motion to Dismiss.⁸

The proposed Plan is distinctly different from the water plan in the original Application in many key aspects. For example, with regard to water delivery, the Application stated that water would be “supplied to the facility in a dedicated water supply pipeline.” Whereas, the revised Plan states that water will be “delivered to the facility via public roads by trucks owned or leased by the facility.”

A second example involves the amount of water needed to support the facility. The original Application stated that the facility’s daily water demand (for both units) under normal full-load conditions would be 104,000 gallons per day (gpd), and under summer full-load conditions would be 225,000 gpd. Invenergy also advised that the facility would require 925,000 gpd on any day the facility was oil fired.

In comparison, the revised Plan states that the facility has been redesigned to greatly reduce water demand.⁹ Invenergy now predicts that by using different technology, discussed below, the revised daily water demand (for both units) under normal full-load conditions would be 15,840 gpd, and under summer full-load conditions would be 18,720 gpd, plus 4,600 gallons per hour (a total of 129,120 gpd) when evaporative coolers are operated.¹⁰ When the facility is

⁶ The Town is in the process of attempting to retain a power plant process engineering firm to assist the Town in meaningful evaluating the revised Plan. As of the date of this filing, no firm has yet been engaged, but we expect to do so shortly.

⁷ Invenergy has 15 days to respond to the Town’s data requests. EFSB Rule 1.27(b)(2).

⁸ The Town acknowledges that it previously requested “at least two weeks” to meaningfully review and evaluate the information provided by Invenergy related to the revised water proposal. It was the Town’s understanding at that time that Invenergy’s original plan would remain largely unchanged (i.e. piped water), and that only the water source would be different. However, Invenergy’s revised Plan is extremely different from the original plan (trucked water and changes in process at the facility intended to reduce water needs). Because of this, two weeks is not adequate to fully evaluate the revised Plan.

⁹ The amount of water necessary under these different circumstances, and the technology proposed to reduce water use so significantly, needs to be independently verified by the Town’s expert consultant(s).

¹⁰ According to the revised Plan, such evaporative coolers would be necessary in summer months “in order to operate the facility under optimal conditions to maximize electricity generation.”

oil fired, the revised Plan states that the daily water demand would be an additional 724,320 gpd. This increased demand would be “met by on site storage.”

A third example relates to the methods Invenergy intends to use to reduce water use. Invenergy expects to replace reverse osmosis and electrodeionization systems with a “trailer mounted demineralization system.” Invenergy refers to incorporating “a means of recovering the flashed steam from the blowdown tank vents” but does not elaborate on the design of such a system. Invenergy also proposes to collect and treat wastewater from certain sources onsite (although Invenergy does not identify the specific method for doing so), while sending wastewater from other sources to unidentified offsite locations for treatment using a wastewater disposal tank or sump.

Consequently, as shown in Exhibit A, the Town has many questions it needs to evaluate related to the revised Plan. A few examples: What affect would the proposed increase in truck traffic have on the Town? What size/type trucks will be used? How frequently will deliveries be made? What days and times will deliveries be made? What affect would the increased emissions from diesel trucks making hundreds of trips to and from the facility have on the Town? How will water be stored on site? Would the proposed technology reduce water use as significantly as Invenergy claims? How does the demineralization system work? Are chemicals involved and in what amounts? How will the Town’s residents be protected from these chemicals? How will wastewater be treated onsite? How and where will wastewater be treated offsite? Questions such as these, and many more, must be answered by Invenergy before the Town and its experts can meaningfully evaluate the revised Plan.

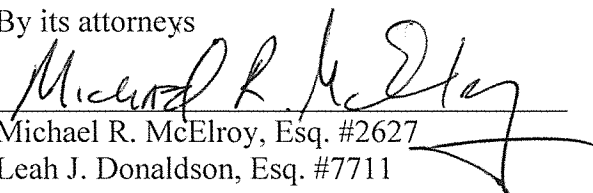
IV. CONCLUSION

WHEREFORE, the Town respectfully requests that the EFSB postpone the February 6, 2017 hearing for at least 45 days in order to allow time for the Town and its experts to meaningfully review, evaluate, and provide input to the EFSB regarding the revised Water Source Plan, its impact on the Application, and whether the revised Water Source Plan is sufficient to support Invenergy's Application.

Dated: January 30, 2017

TOWN OF BURRILLVILLE

By its attorneys



Michael R. McElroy, Esq. #2627

Leah J. Donaldson, Esq. #7711

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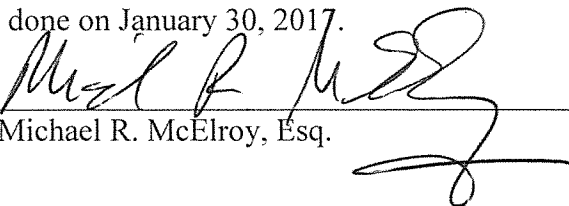
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Leah@McElroyLawOffice.com

CERTIFICATE OF SERVICE

I certify that the original and ten photocopies of this Motion were filed by U.S. Mail, postage prepared, with the Coordinator of the EFSB, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies of this Motion were served via email on the service list for this docket. I certify that all of the foregoing was done on January 30, 2017.



Michael R. McElroy, Esq.

Exhibit A

Schacht & McElroy

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Leah J. Donaldson

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January 30, 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 Dr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 22nd 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 CONSTRUCTION THE : DOCKET No. SB-2015-06
CLEAR RIVER ENERGY CENTER IN :
BURRILLVILLE, RHODE ISLAND :

**THE TOWN OF BURRILLVILLE'S 22nd SET OF DATA REQUESTS TO
INVENERGY THERMAL DEVELOPMENT LLC**

- 22-1 Under the water plan, is it correct that ammonia deliveries increased from 2 per month to 15 per month, or a 13 truckload per month delivery? That equals 26 new trips to and from the site. Please explain the reasons for the increase and the details.
- 22-2 Under the water plan, is it correct that Water Filter Bed media turnover introduces 2 new truck trailers on the roadway per month? That equals 4 trips to and from the site per month. Please explain.
- 22-3 Under the water plan, is it correct that Onsite water storage tank increased from 1,000,000 gallons (1 MG) to 2.25 MG? That is a 125% size increase, which in all likelihood, increases the footprint of impervious at the site. Please explain.
- 22-4 Under the water plan, is it correct that you now propose an Onsite Wastewater Treatment System ("OWTS") to treat wastewater from the office and domestic spaces? Do you agree that this will require an OWTS permit through RIDEM? Is there any potential for treated process wastewater to be introduced to this system? Please explain the details.
- 22-5 Under the water plan, is it correct that water replenish rate after an oil fired operation event is 11 trucks per day, or 22 trips to and from the site? Is this a guarantee? Please explain.
- 22-6 Under the water plan, is it correct that oil replenish rate after an oil fired operation event is 7 trucks per day, or 14 trips to and from the site? Is this a guarantee? Please explain.
- 22-7 Under the water plan, is it correct that you have assumed an oil run event duration for 3 days? What if there is an extended run of this power plant for more than 3 days while running on oil? Do you agree that this would increase the number of truck trips to and from the site during a week's time or longer? Please explain.
- 22-8 Under the water plan, is it correct that the worst case scenario you present is that oil tank depletion (2 MG) will equal 19 trucks per day to replenish, or 38 trips to and from the site? Is this a guarantee? Please explain.
- 22-9 Under the water plan, is it correct that the average truck rate after an oil operation event will be 22 trucks per day new traffic or 44 trips to and from the site? Could this be exceeded? Please explain.

- 22-10 Under the water plan, is it correct that the traffic engineer assumes each truck carries 8,000 gallons per truck but the water host agreement indicates a truck is 7,200 gallons per truck? Do you agree that a recalculation of the traffic engineer's figures are needed, which will increase the truck figures identified above in items 1 through 9? Please explain and provide the recalculation.
- 22-11 Under the water plan, do you agree that Table 2 of McMahon's traffic report is now underestimated due to estimated tanker truck size, and assumes only a 3-day operation event running on oil, so it technically is not the "worst case scenario"? Please explain.
- 22-12 Under the water plan, is it correct that Johnston's signed agreement is dated 1/6/17 by the Mayor, which is 4 days before the Johnston Town Council authorized the Mayor to enter such an agreement with Invenergy? Do you believe this agreement is valid? Please explain.
- 22-13 Under the water plan, is it correct that Invenergy stated to the EFSB that 2 trucks per day on average will be needed to deliver water? However, Johnston's agreement indicates 3 trucks per day and up to 5 trucks per day will be needed on average to deliver water to the site. Do you agree that information to the EFSB needs to be amended accurately reflect which figure is correct? Please explain and amend as needed.
- 22-14 Under the water plan, is it correct that under the Johnston water agreement, CREC has allowed themselves a provision to alter its water consumption at any time? What if CREC decides to sell water 3rd party to another vendor, outside of their sole use? Do you agree that there is no provision in the agreement that would prevent you from doing so? Please explain.
- 22-15 What will happen if an oil operation event occurs more frequently, or lasts longer due to a gas shortage? All the events above indicate that in addition to the figures provided, a 3 truck a day rate is needed just to supply water in addition to the figures above. Do you agree? Please explain.
- 22-16 Please provide Schedule 1 to the Benn Water Agreement.
- 22-17 Please specifically identify and explain the status of the "all necessary permits and/or local approvals" needed as described in the last paragraph of 2.0 of the Water Supply Plan.
- 22-18 How exactly will Invenergy "limit winter distillate oil firing" as discussed in paragraph 2.2.1 (third paragraph)? Will the CREC be subject to pay for performance payments? If so, how much?
- 22-19 Mr. Niland recently publicly stated that the facility will cost approximately \$1 billion to build, not \$700 million. What is the impact of this \$300 million cost increase in Invenergy's financial projections? Has Invenergy revised its financial model based on this \$1 billion cost estimate? If not, why not? If so, please provide a copy.
- 22-20 Has Invenergy requested PA consulting Group ("PA") to update its "monthly 20-year forecast (2019 through 2038) of the ISO-NE power market and a 20-year forecast (2019

through 2038) of PEC's operations and cash flows,"¹ based on the revised Water Supply Plan filed with the EFSB on January 1, 2017? If not, why not? If so, please provide a copy.

- 22-21 When providing a copy of any analysis, please provide a copy of the output of the model in sufficient detail to understand the forecasts.
- 22-22 If the PA forecast of future operations has not been updated, provide a copy of the most recent forecasts by Invenergy or any other consultant working for Invenergy relating to the operation of the CREC.
- 22-23 Provide the following annual data:
- a. Annual number of MWH the CREC is anticipated to produce operated on natural gas between 2019 and 2038 broken down by calendar year;
 - b. Annual number of MWH the CREC is anticipated to produce operated on ultra-low sulfur distillate ("ULSD") between 2019 and 2038 broken down by calendar year;
 - c. Annual cost of water in \$/MWH added to the variable cost of the unit when firing ULSD.
- 22-24 Provide the estimated monthly number of mobile demineralization trailers that will be needed per calendar year between 2019 and 2038 to operate the CREC and the total cost.
- 22-25 Provide all cost benefit analyses prepared or considered by Invenergy in selecting its most recent source of water in the Water Supply Plan submitted to the EFSB.
- 22-26 Provide all water ranking analyses or other documents analyzing the costs, benefits and shortcomings Invenergy developed or considered prior to submission of the Water Supply Plan to the EFSB.
- 22-27 Can an industrial accident anywhere on the power plant site trigger a subsequent or chain reaction at the compressor station site? Please explain.
- 22-28 How will the Spectra compressor station and pipeline be protected from an event potentially triggering a larger scale accident at the Spectra site? Has this potential been calculated into the scope of the impact area proximate to the site?
- 22-29 Does the change in plant processes associated with the reduction in water usage have any impact on site and neighborhood safety? Please explain.
- 22-30 Please provide the identity and location of all power plants Invenergy or its subsidiaries (or other operators) operate with the newly proposed water/sewer saving technology to be incorporated into the CREC plant.

¹ See PA letter dated June 16, 2015.

- 22-31 There is mention of summer time evaporative cooling usage at a rate of 4,600 gallons per hour (gph). There is limited mention of the duration for such an event (seldom during evenings, etc.), but no defined duration per event.
- How many hours per day would evaporative cooling usage occur?
 - How many days per year on average would evaporative cooling usage occur?
- 22-32 There are four (4) water balance diagrams showing different typical scenarios, but none of the scenarios include evaporative cooling usage.
- How much of the water used during the evaporative cooling scenarios would be consumptive (i.e., result in losses that would require make-up water)?
 - What would be the source of this water?
 - How would it be supplied to the site?
- 22-33 Assuming a 3-day oil-fired event, as outlined in the report as a worst-case scenario, do you agree that approximately 2.2M gallons would be consumed? It is unclear in the water plan as to the capacity of the various storage tanks (service/fire water and demineralized water). What are all the proposed on site water storage capacities?
- 22-34 The plan outlines a lengthy refill strategy of up to 1 month where approximately 9 additional trucks per day (72,000 gpd) will be used.
- Is there a minimum water storage capacity required or planned at the site for fire protection?
 - Is there a plan to have some peak water truck delivery (for example, 30 to 60 trucks on Day 1 of the refill) in order to satisfy fire protection needs?
- 22-35 Is it possible that this revised process may impact the overall footprint of the facility and further impact wetlands? Please explain, and please submit a site plan for the revised facility.
- 22-36 Is it true that with the reduced process water demand for the project, the local water suppliers may have adequate capacity to provide water to the CREC? Could a local water supply be piped to the site, eliminating the impacts of trucking water to the site?
- 22-37 Could onsite subsurface conditions be evaluated to determine if the site could provide both process and potable water to the facility?
- 22-38 Do you have agreements with a treatment facility to take the wastewater? If so, please provide copies. If not, please explain why not.
- 22-39 Please verify the water truck planned capacity, which has been reported as both 7,200 gallons and 8,000 gallons.

- 22-40 The Trip Generation in the original report (May 2016) does not specifically reference an oil-fired event. Please explain in detail the assertion that the generated traffic from such an event has been reduced.
- 22-41 Is there a plan for monitoring and/or enforcing the voluntary extension of the oil-firing replenishment duration? Are the specifics of this duration extension documented somewhere? Wouldn't this be inefficient and costly for the operators? Please explain.
- 22-42 What truck percentages were used in the previous signalized intersection analyses and in the updated analysis? Please explain.
- 22-43 Please provide the Synchro © (computer analysis) files for the signalized intersection analyses for both the current projections and the original projections.
- 22-44 Please provide a copy of Johnston's wholesale water agreement with Providence Water.
- 22-45 Please provide the total estimated truck emissions that will be generated on an annual basis, by type and amount, for all of the trucks coming and going from the facility:
- a. During the construction period.
 - b. During the operating period.

Please explain what impact these emissions will have on the people who live in Burrillville and the wildlife near the plant.

- 22-46 Do you agree that diesel exhaust has been categorized as an INRC class 1 carcinogen? If not, please explain.
- 22-47 Do you agree with the following excerpt from an article written by the Union of Concerned Scientists? Please explain anything you disagree with:

Health Impacts of Diesel Pollution

Diesel-powered vehicles and equipment account for nearly half of all nitrogen oxides (NO_x) and more than two-thirds of all particulate matter (PM) emissions from US transportation sources.

Particulate matter or soot is created during the incomplete combustion of diesel fuel. Its composition often includes hundred of chemical elements, including sulfates, ammonium, nitrates, elemental carbon, condensed organic compounds, and even carcinogenic compounds and heavy metals such as arsenic, selenium, cadmium and zinc. Though just a fraction of the width of a human hair, particulate matter varies in size from coarse particulates (less than 10 microns in diameter) to fine particulates (less than 2.5 microns) to ultrafine particulates (less than 0.1 microns). Ultrafine particulates, which are small enough to penetrate the cells of the lungs, make up 80-95% of diesel soot pollution.

Particulate matter irritates the eyes, nose, throat, and lungs, contributing to respiratory and cardiovascular illnesses and even premature death. Although everyone is susceptible to diesel soot pollution, children, the elderly, and individuals with preexisting respiratory conditions are the most vulnerable. Researchers estimate that, nationwide, tens of thousands of people die prematurely each year as a result of particulate pollution. Diesel engines contribute to the problem by releasing particulates directly into the air and be emitting nitrogen oxides and sulfur oxides, which transform into “secondary” particulates in the atmosphere.

Diesel emissions of nitrogen oxides contribute to the formation of ground level ozone, which irritates the respiratory system, causing coughing, choking, and reduced lung capacity. Ground level ozone pollution, formed when nitrogen oxides and hydrocarbon emissions combine in the presence of sunlight, presents a hazard for both healthy adults and individuals suffering from respiratory problems. Urban ozone pollution has been linked to increased hospital admissions for respiratory problems such as asthma, even at levels below the federal standards for ozone.

Diesel exhaust has been classified a potential human carcinogen by the U.S. Environmental Protection Agency (EPA) and the International Agency for Research on Cancer. Exposure to high levels of diesel exhaust has been shown to cause lung tumors in rats, and studies of humans routinely exposed to diesel fumes indicate a greater risk of lung cancer. For example, occupational health studies of railroad, dock, trucking, and bus garage workers exposed to high levels of diesel exhaust over many years consistently demonstrate a 20 to 50 percent increase in the risk of lung cancer or mortality.

- 22-48 What effect, if any, will the change in operating processes as set forth in the water plan have on data previously provided in the application and data responses? Please explain.
- 22-49 CREC’s traffic Consultant McMahon Transportation Engineers and Planners has analyzed the intersection of Pascoag Main and South Main Street Intersection’s Level of Service (LOS) and reported that it degrades to “E” during construction for “short periods.” Please have the consultant re-evaluate this intersection for the water refill truck traffic both during construction and post-construction and during water and oil refilling operations and provide a copy.
- 22-50 Please have the CREC Traffic Consultant review and analyze tanker truck movements through the Pascoag Main/South Main Street and the Route 100 (Church Street) and High Street intersection because these movements require water tanker trucks to cross the centerline in order to make the turns and provide a copy. Please explain whether this movement will likely affect the LOS.
- 22-51 Please have the CREC Traffic Consultant review and report on the truck turning radii versus the road geometry. This needs to be revisited. Do you agree that Invenergy/RIDOT

will need easements to widen the radii at the Route 100 (Church Street) and High Street intersection, and that road geometry versus tanker truck turning radii will slow traffic and create roadway centerline conflicts at a confusing intersection? Please explain your answer.

- 22-52 Please have the CREC Traffic Consultant review and report on the corner geometry versus turn radii at the Church Street corner adjacent to the Community Baptist Church and School. This intersection is 1,000 feet north of Route 100/High Street intersection.
- 22-53 Please have the CREC Traffic Consultant review and report on the sight distances at the Route 100 corner at Serio's Pizzeria. There is an abandoned building that limits sight distances at this corner located 200 feet south of Lauren Hill/Route 100 Intersection.
- 22-54 Does the new cooling method increase the amounts of hazardous/contaminated materials such as ammonia, fuel, sewage, etc. to be transported over roadways through the Town and State? Please explain.
- 22-55 What is the increased projection of accidents and spills which could occur by the increase in truck traffic at the four intersections/corners described above? Please explain.
- 22-56 What size are ammonia containing delivery trucks? If the amount is increased, can ammonia containing trucks use an alternate route to the plant through a less populated area? The area along Route 100 from Steere Farm Road to Serio's Pizzeria is our most populated area in town, with two nursing homes (Bayberry Commons and Overlook Nursing Home) and two schools (Steere Farm Elementary and Baptist Community Church/School) within 1,500 feet of roadway. Please answer and explain.
- 22-57 Is Johnston your one exclusive primary water source or are you still considering any other water sources?
- 22-58 What will you do if Providence refuses to allow Johnston to re-sell water to Invenergy?

Respectfully submitted,
Town of Burrillville
By its attorneys



William C. Dimitri, Esq. #2414

Town Solicitor

462 Broadway

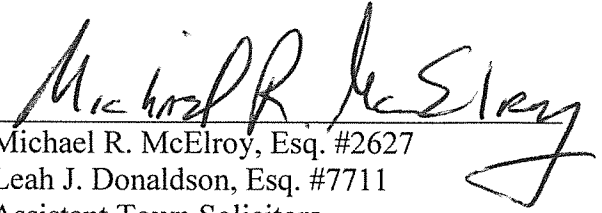
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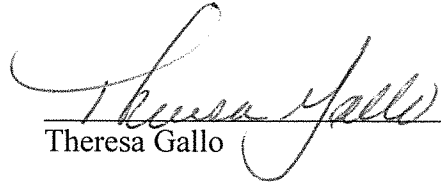
Michael@McElroyLawOffice.com

Leah@McElroyLawOffice.com

Date: January 30, 2017

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2017, I sent a copy of the foregoing to the attached service list.



Theresa Gallo

Burrillville Invenenergy EFSB Data Requests Set 22

SB-2015-06 Invenergy CREC Service List as of 01/27/2017

Name/Address	E-mail	Phone/FAX	
<p>File an original and 10 copies with EFSB: 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>	Todd.Bianco@puc.ri.gov ;	401-780-2106	
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