

**Comments of David Brunetti**  
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**RI Energy Facilities Siting Board Public Hearing**  
**On the Proposed Invenergy Power Plant in Burrillville, RI**  
**Wednesday, September, 21, 2016**

Members of the RI Energy Facilities Siting Board:

My name is David Brunetti, of 935 Sherman Farm Road in Harrisville. I am opposed to the construction of the proposed Power Plant and have many reasons for this, but at this time, I'd simply like to focus on the lack of justification or need for the project and I will use the words of the experts at our own state department of environmental management, as presented in the 3<sup>rd</sup> set of data requests from RIDEM to Invenergy.

1. As stated, "The applicant makes several conflicting and confusing assertions about the purpose and need for the project and the assessment of suitable alternatives." "The alternatives analysis presents numerous instances of circular logic." For example: "Dismissing hydropower in the Power Generation Alternatives"... "solely because it would not be appropriate on the proposed CREC site, [a site] which was selected for proximity to the gas line, and then dismissing alternative project locations because they do not have the desired natural gas infrastructure".

2. "The emissions and cost-benefit analyses" "primarily list only benefits"... "There is no mention of loss of forests, biodiversity, ecosystem services, such as moderation of extreme hot and cold weather, climate change mitigation, water quality, health, etc. This seems particularly important since the applicant notes that the majority of the benefits that are outlined – construction jobs and energy cost savings – would be rather short-lived and the majority of the foreseeable costs would be long term or permanent."

3. "Section 3.2 states the project's purpose and function as helping ISO-New England "meet its capacity, reliability, and operational requirements and needs for the regional electric transmission network", yet the proposed location was deemed the only option that meets the purpose of the project [simply] **because** the chosen starting point for the search was a location that meets the needs of a natural gas facility in RI rather than one that assists with the energy needs of the ISO-New England. The premise that natural gas is the only way to meet demand is not borne out by the information provided."

4. As stated, "It is false logic to imply that the results of the ISO" supply and demand auctions..."demonstrate a need for CREC specifically and/or prove that it would have superior energy efficiency and/or environmental value/benefits over other sources." "A thorough needs assessment should consider the current and projected energy portfolio as a whole rather than use the retirements of outdated facilities to justify additional natural gas [usage]." The applicant needs to "justify a large investment in a "bridge fuel" with its attendant environmental consequences."

5. “The applicant presents the 1000 MW proposed for CREC as the standard for the project and dismisses alternatives that do not achieve the full quantity from a single source on a single site. Where did the 1000 MW [figure] come from and why must the entire quantity be met with one energy source at a single site?”... **“The applicant ignores the benefit of solar in a state that can ill-afford to lose more forestland”**...“solar can take advantage of already developed/impacted areas to avoid virgin land [use] and does not need to be all in one place to add up to substantial generation” and “reduce demands on the grid.”
6. “ISO-New England reports indicate that there is excess supply elsewhere within the region and that **transmission** is a barrier”, **not supply**.

Therefore, based on the Department of Environmental Management’s statements, this plant is not needed.

Four other points to be considered:

1. Impacts to Fish and Wildlife.

As stated in their Advisory Opinion, “DEM cannot, with such little site-specific information, make conjectures on the full suite of species that would be impacted by the project and the exact nature of those projects.

*It can, however, reasonably assume that the further fragmentation of one of the largest remaining intact forests in the State will negatively impact area fish and wildlife, including interior forests specialists listed as Species of Greatest Conservation Need in the state’s Wildlife Action Plan. With additional survey, it is plausible that State-listed species may be found to occur within the project footprint and/or within the extended limits of indirect impacts from the Facility.”*

2. Lack of provision of a Preliminary Plan for the proposed project.

A preliminary plan was supposed to be provided by Invenergy to the Town of Burrillville and its respective Planning and Zoning Boards back in May of this year. Yet here we are, over four months later and such a plan has not been submitted. Have you, the members of the EFSB seen such a plan from Invenergy? How can you make the detailed assessment needed for a decision without review of such a plan?

3. Environmental Assessment (“EA”) and Environmental Impact Statement (“EIS”).

As stated on page 3 in the 8<sup>th</sup> set of responses from Invenergy to the Town of Burrillville, dated May 16, 2016, and I quote – “the US Army Corps of Engineers will be responsible for preparing an Environmental Assessment (“EA”) to determine whether an Environmental Impact Statement (“EIS”) will be required for the project. If required, the preparation of the EIS would be the responsibility of the US Army Corps of Engineers.”

Has such an Environmental Assessment been completed at this point? If so, has it been determined that an Environmental Impact Statement is now necessary? If yes, what are the chances that the EIS will be completed prior to your due date for the rendering of your final decision?

4. Fuel Oil Piping, Pumping, and Storage.

As stated on page 4 in the 1st set of the responses from Invenergy to the Department of Environmental Management, dated June 23, 2016, and I quote – “detailed engineering of the fuel oil system will not be initiated until late 2016 or early 2017. Consequently, the detailed design of the fuel oil piping, pumping, and storage tank systems is not available at this time”.

This seems highly unreasonable, especially since such design should be part of the Preliminary Plan, which was supposed to be provided to the Town for review back in May of this year.

To date, such a detailed design of the fuel oil piping, pumping, and storage tank systems is still not complete or at least has not been communicated to the Town of Burrillville. What is the expected date of completion?

How does Invenergy expect this Board to make an assessment as to the potential people, wildlife, and general environmental impacts from such a system without any detailed engineering plans?

Thank you for the opportunity to provide you with my comments.

Sincerely,

David A. Brunetti

