

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company d/b/a :
National Grid and Clear River Energy LLC :
(Burrillville Interconnection Project) : Docket No. SB-2017-01

**CLEAR RIVER ENERGY LLC'S OBJECTION TO THE
TOWN OF BURRILLVILLE'S MOTION FOR A SHOW CAUSE HEARING**

Co-Applicant, Clear River Energy LLC ("CRE") hereby objects to Intervenor, the Town of Burrillville's (the "Town") Motion for a Show Cause Hearing.

The bulk of the Town's Motion references the so-called Large Generator Interconnection Agreement ("LGIA"). However, the Town is well aware that the LGIA does not serve as an independent basis to argue alleged ratepayer impact. Thus, the Town at page 4 of its Motion for a Show Cause Hearing requests that the Board issue an "Order[,] similar to the EFSB Order No. 117" that was entered in Docket No. SB-2015-06.

The Board, upon entry of Order No. 117 in Docket No. SB-2015-06, limited the issues related to the FERC litigation to FERC Docket EL18-31, commenced on November 17, 2017. Order No. 117 does not reference the LGIA.

Therefore, the Town files this most recent Motion for a Show Cause Hearing in this docket solely for inflammatory reasons. Certainly, the Board in this Docket can take notice of the results of a show cause hearing now scheduled pursuant to Order No. 117 in Docket No. SB-2015-06.

If the show cause hearing in Docket No. SB-2015-06, scheduled pursuant to Order No. 117 therein, does not result in a suspension of proceedings, then such underlying facts cannot serve as a basis to suspend proceedings in this docket. In fact, as pursuant to the Board's mandate to expedite transmission line licensing pursuant to Rule 1.36, the Board could expedite

and summarily deal with the issue in this Docket, as a result of findings rendered after the show cause hearing in Docket No. SB-2015-06. Similarly, the Board should also note that the Town has asked to extend the dates for advisory opinions under the Preliminary Order entered herein. CRE respectfully submits that it is premature to rule on extending the advisory opinion deadlines at least until the Board renders a show cause determination in Docket No. SB-2015-06.¹

Furthermore, the Town is requesting that the Board consolidate Docket Nos. SB-2015-06 and this Docket No. SB-2017-01. CRE submits that there is simply no provision whatsoever in the applicable procedural rules that would allow such consolidation.

For the reasons, CRE objects to the Town of Burrillville's Motion for a Show Cause Hearing, to consolidate that show cause hearing with proceedings in Docket No. SB-2015-06, and to extend procedural deadlines at this time.

Respectfully submitted,

Clear River Energy LLC
By their attorneys,

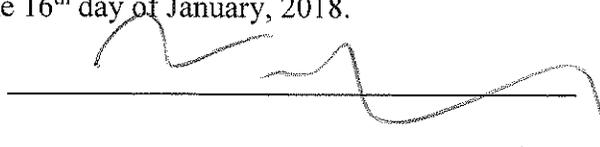


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Dated: January 16, 2018

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the within was sent by e-mail to the following referenced on the attached service list this the 16th day of January, 2018.



¹ CRE recognizes that a pending request has been made by the Public Utilities Commission to extend the advisory opinion deadline. CRE respectfully requests that the Board wait until making a show cause determination in SB-2015-06 before making a determination as to whether an extension is needed.

SB-2017-01 Burrillville Interconnection Project Service List as of 10/12/2017

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