

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: Application of
Invenergy Thermal Development LLC's
Proposal for Clear River Energy Center

Docket No. SB 2015-06

**Objection of Conservation Law Foundation To
Invenergy's Motion To Strike**

Conservation Law Foundation (CLF) respectfully objects to Invenergy's Motion To Strike CLF's Memorandum of Law pertaining to witness credibility, which motion Invenergy filed and served on March 25, 2019.

Invenergy cites no EFSB rule that suggests that it is improper for a party to file a memorandum of law on a matter pending before the EFSB (for there is no such rule).¹

Importantly, Invenergy states that it agrees with CLF's principal legal point concerning the critical importance of witness credibility. Invenergy's Motion To Strike, at 2.

For these reasons, CLF respectfully requests that Invenergy's Motion To Strike be denied.

CONSERVATION LAW FOUNDATION,
by its Attorney,



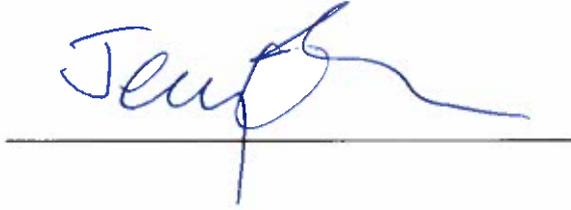
Jerry Elmer (# 4394)

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¹ Invenergy's citation to EFSB Rule 1.17 is inapposite because CLF's memorandum does not ask the Board to take any action.

CERTIFICATE OF SERVICE

I certify that the original and seven hard copies of this document were hand delivered to the Energy Facility Siting Board and served electronically on the service list of this docket on March 28, 2019.

A handwritten signature in blue ink is written over a horizontal line. The signature is cursive and appears to read "J. Smith".