



State of Rhode Island and Providence Plantations

GENERAL ASSEMBLY

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PUBLIC UTILITIES COMMISSION

April 7, 2016

Energy Facility Siting Board
Attn: Margaret E. Curran, Chairperson
89 Jefferson Boulevard
Warwick, RI 02888

Dear Chairperson Curran:

After thoughtful consideration, we write to express our unequivocal opposition to Invenergy's application to construct a 1000-megawatt, fracked gas power plant in the heart of Burrillville's idyllic village of Pascoag.

Prior to taking this position, we met with residents at the State House, hosted a town hall style meeting at the Jesse M. Smith Memorial Library that was attended by hundreds of residents – in fact so many that not everyone was able to gain access to the room – and listened to the entirety of your board's public hearing at the Burrillville High School. Additionally, we have responded to countless constituents who have contacted our offices in favor and opposition to the proposed power plant. During all of this, we listened closely to our constituents. ***As a result of the above, we have become convinced that this proposed power plant is inappropriate for siting in Burrillville and we urge your rejection of Invenergy's application.***

As an initial matter, it must be stated that Burrillville has already done more than its fair share for the region's energy needs. As you know, Burrillville already hosts a fossil fuel burning power plant and has done so for over two decades. Siting a second power plant in the same town does not comport with any rational notion of fairness. More importantly, having two power plants within five miles of one another raises serious concerns regarding cumulative negative health effects.

Additionally, the very residents who would be impacted most adversely by the proposed power plant have already endured – and continue to endure – the extreme inconvenience of a gas pipeline compression station located directly adjacent to the proposed site of this power plant. These residents have sacrificed enough of the quiet enjoyment of their homes. No more should be asked of them. We certainly should not ask them to suffer the loss in market value to their homes that the siting of this power plant would entail.

Moreover, the present proposal runs afoul of the mandated policy of the Energy Facility Siting Board that, pursuant to RI Gen. Laws § 42-98-2, any proposal must assure that the:

“...construction, operation and decommissioning of 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.”

We question whether this proposal addresses this policy requirement. While the proposed site may be the most economically advantageous location for the developer, the placement of this mega-facility ensures an immeasurable adverse impact on the quality of the state’s environment. There are certainly alternative sites in heavy industrial zones where the environmental destruction/impact would be minimized. There are sites where other facilities have been decommissioned. There are other sites that provide adequate pipeline and transmission access that will not destroy these otherwise pristine natural resources. It is incumbent upon the Energy Facility Siting Board to require that Invenergy identify alternative sites.

Indeed, it goes without saying that the area is completely out of character for this proposed power plant. The George Washington Management Area, Casimir Pulaski Memorial State Park, the Buck Hill Management Area, and the Black Hut Management Area are all in the immediate vicinity. The proposed site is also in the immediate vicinity of numerous pristine bodies of water including Wilson’s Reservoir, Wakefield Pond, Round Lake, Wallum Lake, Pascoag Reservoir/Echo Lake, Pulaski Pond, Bowdish Reservoir and Lake Washington. These are unquestionably some of Rhode Island’s last, great, inland natural resources. To put these natural resources at risk by siting a colossal power plant in the middle of them would be unconscionable.

We also express opposition to this proposed power plant on behalf of the residents and staff of Zambarano Hospital, which is located only a short distance up the road from the proposed site. We view as sacrosanct our obligation to speak on behalf of the patients at Zambarano, many of whom lack the capacity to speak on their own behalf. Our friends at Zambarano are the very people that government exists to protect – government should not now put them in harm’s way.

Our concerns with regard to Zambarano are twofold. First, the hospital’s water supply is drawn directly from Wallum Lake. That water supply must be protected. Second, in the event of a catastrophe at the proposed power plant, it seems highly unlikely that the nearly 120 patients at Zambarano could possibly be evacuated in a safe manner. We understand the likelihood of such an event is low. Should it come to pass, however, the humanitarian crisis it would create would be unfathomable.

Further, each of us has the privilege of representing the good people of Glocester in addition to Burrillville in the General Assembly. For our Glocester constituents, this proposed power plant promises only burden, without any corresponding benefit. For example, we have serious concerns that during the proposed construction of this power plant, traffic flow through the historic village of Chepachet would be unworkable. The village of Chepachet is already burdened with heavy traffic during peak times.

Our concerns regarding traffic extend not only to Gloucester, but also to Burrillville and in particular to those living on Route 100. Obviously, the sheer amount of heavy traffic that would be involved in building the proposed power plant would be incredibly burdensome for anyone living on Wallum Lake Road. Our peaceful town would be subjected to nuisance activity of all kinds: congestion, noise, light, and, in all likelihood, dropping property values.

It is also clear that the developer has failed to meet the three (3) requirements set forth in RI Gen. Laws § 42-98-11(b) for obtaining approval from the Energy Facility Siting Board. First, based on the environmental impact and the requirement that the state increase its use of alternative energy facilities, it is clear that “energy of the type to be produced by the proposed facility” is not needed. Second, the proposed facility is not “cost-justified” from any perspective, including its negative impact on the health, safety and welfare of the hundreds of nearby residents and the environmental devastation that will result. Thirdly, it is also clear that the proposed facility will “cause unacceptable harm to the environment.”

Finally, as a matter of law, this board has testimony that approval of Invenergy’s application would be inconsistent with the Resilient Rhode Island Act of 2014, RI Gen. Laws § 42-6.2 et seq., which both of us were proud to support as legislators. As you know, that Act calls for reductions of greenhouse gas emissions by 25% below 1990 levels by 2025, 50% below 1990 levels by 2035, and 85% below 1990 levels by 2050.

For all of the above reasons, as well as numerous others, we request on behalf of our constituents that you deny Invenergy’s application.

Thank you.



Cale P. Keable
State Representative
District 47 (Burrillville, Gloucester)



Paul W. Fogarty
State Senator
District 23 (Burrillville, Gloucester, North Smithfield)

cc: The Honorable Gina Raimondo