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March 28, 2016

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: *Docket No. 4609 – PUC Advisory Opinion Regarding
Need to Construct the Clear River Energy Facility***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following document:

1. Paul and Mary Bolduc's Unopposed Motion For Intervention.

Please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf

Enclosure

cc: Docket 4609 Service List and EFSB Docket
SB-20150-06 Service List (*via electronic mail*)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: APPLICATION OF INVENERGY THERMAL :
DEVELOPMENT LLC'S PROPOSAL FOR : **DOCKET No. 4609**
CLEAR RIVER ENERGY CENTER :

PAUL AND MARY BOLDUC'S UNOPPOSED MOTION FOR INTERVENTION

NOW COMES Paul and Mary Bolduc ("the Bolducs"), and pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("Commission"), moves that the Commission grant the Bolducs' request to intervene as parties in the above-captioned docket for the reasons set forth herein:

1. On or about March 11, 2016 the Commission opened the above-captioned docket on referral from the Energy Facility Siting Board ("EFSB").
2. As part of EFSB Docket SB-2015-06, the EFSB requested that the Commission render an advisory opinion on certain issues to be considered in evaluating Invenergy Thermal Development LLC's ("Invenergy") Application to Construct the Clear River Energy Center in Burrillville, Rhode Island.
3. The Bolducs' filed a Motion to Intervene in EFSB Docket SB-2015-06, which was granted.
4. As noted in the EFSB's Order granting the Bolducs' intervention in Docket SB-2015-06, the Bolducs reside on Wallum Lake Road in Burrillville approximately 0.10 miles from the corner of the property where Invenergy proposes to site and construct the Clear River Energy Center.

5. If Invenergy's Application is granted, the Bolducs maintain that the proposed facility will negatively impact the value of their property, the environment, traffic, health and safety, and aesthetic and recreational value of their property and the community.
6. The Bolducs also maintain that the project will have a negative impact on the rural character of the Town of Burrillville and on future development and that licensing the project would deprive them of the full use and enjoyment of their property.
7. Intervention in Commission proceedings is governed by Rule 1.13 of the Commission's Rules of Practice and Procedure, which states:

"Subject to the provisions of these rules, any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission. Such right or interest may be:

 - (1) A right conferred by statute.
 - (2) An interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding. (The following may have such an interest: consumers served by the applicant, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)
 - (3) Any other interest of such nature that movant's participation may be in the public interest."
8. The Bolducs have a strong interest in the subject matter of this Docket that may be directly affected, and which is not adequately represented by the existing parties in this Docket.
9. The Bolducs' participation in this Docket will be in the public interest.
10. At a procedural scheduling conference on March 11, 2016 in this Docket, counsel for the Bolducs inquired of all parties whether there was any objection to their intervention. No objection was raised at that time.

WHEREFORE, Paul and Mary Bolduc, request that the Rhode Island Public Utilities Commission grant their Motion to Intervene and that they be granted status as parties in this proceeding, and that the Commission grant all other relief it deems meet and just.

PAUL BOLDUC AND MARY BOLDUC,
By their attorney,



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Dated: March 28, 2016

CERTIFICATION

I hereby certify that on March 28, 2016, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

<u>Name/Address</u>	<u>E-mail</u>	<u>Phone/FAX</u>
<u>File an original and 10 copies with EFSB:</u> Todd Bianco, Coordinator Energy Facility Siting Board 89 Jefferson Boulevard Warwick, RI 02888 Margaret Curran, Chairperson Janet Coit, Board Member Assoc. Dir., Div. of Planning c/o Kim Crabill Patti Lucarelli Esq., Board Counsel Susan Forcier Esq., Counsel Rayna Maguire, Asst. to the Director DEM	Todd.Bianco@puc.ri.gov ;	<u>401-780-2106</u>
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