

Schacht & McElroy

Michael R. McElroy
Leah J. Donaldson

Attorneys at Law

Michael@McElroyLawOffice.com
Leah@McElroyLawOffice.com

Members of the Rhode Island
and Massachusetts Bars

21 Dryden Lane
Post Office Box 6721
Providence, RI 02940-6721

(401) 351-4100
fax (401) 421-5696

March 24, 2016

Luly Massaro
Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Invenegy Thermal Development LLC – Clear River Energy Center – PUC
Docket No. 4609

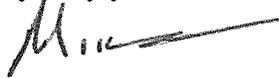
Dear Luly:

I am an Assistant Solicitor for the Town of Burrillville.

Enclosed for filing in this matter are an original and four copies of an Unopposed Motion to Intervene being filed by the Town of Burrillville in this docket. Copies have been served on the service list.

If you need any further information, please do not hesitate to contact me.

Very truly yours,



Michael R. McElroy

MRMc:tmg

Burrillville Invenegy 4609 Intervention

**Docket No. 4609 – PUC Advisory Opinion Regarding Need to Construct the Clear River Energy Facility
Service List as of 03/14/2016**

Name/Address	E-mail	Phone
Invenergy Thermal Development LLC (Clear River Energy Facility) Alan Shoer, Esq. Richard Beretta, Esq. Elizabeth Noonan, Esq. Nicole Verdi, Esq. Adler, Pollock & Sheehan One Citizens Plaza, 8 th Floor Providence, RI 02903	ashoer@apslaw.com ;	401-274-7200
	rberetta@apslaw.com ;	
	enoonan@apslaw.com ;	
	nverdi@apslaw.com ;	
John Niland, Dir. Of Business Development Tyrone Thomas, Esq., Asst. General Counsel Invenergy Thermal Development LLC One South Wacker Drive, Suite 1900 Chicago, IL 60600	jniland@invenergylc.com ;	312-224-1400
	Tthomas@invenergylc.com ;	
Division of Public Utilities and Carriers Leo Wold, Esq. Department of Attorney General 150 South Main Street Providence, RI 02903	LWold@riag.ri.gov ;	401-274-4400
	Jmunoz@riag.ri.gov ;	
	Dmacrae@riag.ri.gov ;	
John J. Spirito, Esq., Chief of Legal Steve Scialabba, Chief Accountant	john.spirito@dpuc.ri.gov ;	401-941-1400
	steve.scialabba@dpuc.ri.gov ;	
	Don.ledversis@dpuc.ri.gov ;	
Seth Parker Boris Shapiro Levitan & Associates, Inc. 100 Summer Street Suite 3200 Boston, MA 02110	sgp@levitan.com ;	617-531-2818
	bls@levitan.com ;	
Office of Energy Resources Andrew Marcaccio, Esq. Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908	Andrew.Marcaccio@doa.ri.gov ;	401-222-3417
	Nicholas.Ucci@energy.ri.gov ;	401-574-9100
	Christopher.Kearns@energy.ri.gov ;	
Statewide Planning Program Jared Rhodes, Chief Statewide Planning Program	Jared.rhodes@doa.ri.gov ;	401-222-5731
Public Utilities Commission (PUC) Luly E. Massaro, Commission Clerk 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.wilsonfrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's :
PROPOSAL FOR CLEAR RIVER ENERGY CENTER : DOCKET No. 4609

UNOPPOSED MOTION FOR INTERVENTION
BY THE TOWN OF BURRILLVILLE

1. The Town of Burrillville (Burrillville), pursuant to Public Utilities Commission (PUC) Rule of Practice and Procedure 1.13, respectfully files this Unopposed Motion for Intervention in this Docket.

2. On or about March 11, 2016, the PUC opened this Docket No. 4609, on referral from the Energy Facility Siting Board (EFSB). In this Docket, the PUC will address certain issues pertaining to Invenegy's pending application before the EFSB to build a new fossil-fueled power plant in Burrillville, Rhode Island. The issues to be addressed by the PUC include the need for the plant and impacts of the plant.

3. At the March 11, 2016 scheduling conference at the PUC in this Docket No. 4609, there was no objection raised by any party to this Motion.

4. Burrillville is the host community for the proposed plant. Therefore, under EFSB Rule of Practice and Procedure 1.10(a), Burrillville is entitled to participate as a full party in the EFSB docket as a matter of right.

5. Intervention in PUC proceedings is governed by PUC Rule of Practice and Procedure 1.13.

6. PUC Rule of Practice and Procedure 1.13(b) states, in relevant part, that "any person claiming . . . an interest of such a nature that intervention is . . . appropriate may intervene in any proceeding before the Commission."

7. PUC Rule of Practice and Procedure 1.13(e) states, in relevant part, that “all timely motions to intervene not objected to by any party within ten (10) days of service of the motion for leave to intervene shall be deemed allowed . . .”.

8. As noted above, Burrillville learned at the scheduling conference in this Docket No. 4609, conducted by PUC counsel, that there is no objection to Burrillville’s Motion to Intervene from any party.

9. Two of the substantive issues in the underlying EFSB case that Burrillville, as the host community, seeks to address were referred to the PUC for an advisory opinion: the need for the proposed plant and impacts of the proposed plant.

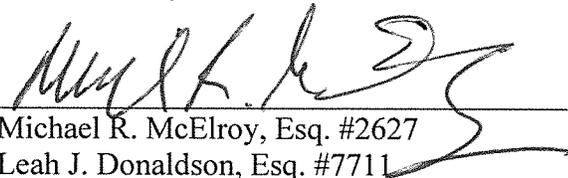
10. Participation in this proceeding by Burrillville will serve the public interest.

11. No other party can represent the unique host community interests of Burrillville.

WHEREFORE, for the foregoing reasons, Burrillville respectfully requests that its Motion to Intervene in this Docket be granted.

TOWN OF BURRILLVILLE

By its attorneys



Michael R. McElroy, Esq. #2627

Leah J. Donaldson, Esq. #7711

Schacht & McElroy

21 Dryden Lane

P.O. Box 6721

Providence, RI 02940-6721

Tel: (401) 351-4100

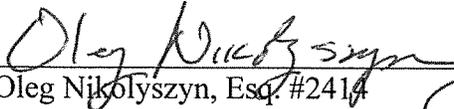
Fax: (401) 421-5696

Michael@McElroyLawOffice.com

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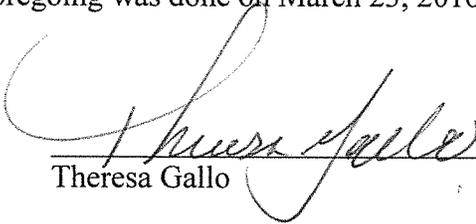
Dated: 3/24/16

Dated: 3/24/16


Oleg Nikolyszyn, Esq. #2414
155 South Main Street
Suite 303
Providence, RI 02903
Tel: (401) 474-4370
Fax: (401) 273-5290
Oleg@NikolyszynLaw.com

CERTIFICATE OF SERVICE

I certify that the original and four photocopies of this Motion were filed by U.S. Mail, postage prepared, with the Clerk of the Public Utilities Commission, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies of this Motion were served via email on the service list for this Docket. I certify that all of the foregoing was done on March 23, 2016.


Theresa Gallo