



April 6, 2016

BY OVERNIGHT MAIL

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 Motion for Intervention of The Narragansett Electric Company d/b/a National Grid. Please note that an electronic copy of this Motion has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Bess B. Gorman".

Bess Beikoussis Gorman  
Assistant General Counsel

Enclosure s

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: INVENERGY THERMAL  
DEVELOPMENT LLC'S APPLICATION  
TO CONSTRUCT CLEAR RIVER  
ENERGY CENTER IN BURRILLVILLE,  
RHODE ISLAND**

**DOCKET NO. 4609**

**MOTION TO INTERVENE OF THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID**

Pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (PUC), The Narragansett Electric Company d/b/a National Grid (National Grid), respectfully files this Motion to Intervene in Docket 4609. On March 11, 2016, the Energy Facility Siting Board (EFSB or Board) designated the PUC to render an advisory opinion in EFSB Docket No. SB-2015-06. As a result of this designation, the PUC opened Docket 4609. In its Application to the EFSB to site a 900 megawatt (MW) gas-fired combined-cycle electricity generating facility in Burrillville, Rhode Island, Invenergy Thermal Development LLC (Invenergy) represented that its generating facility will connect to National Grid's Switching Station via a new 6-mile long electric transmission line to be installed and owned by National Grid. National Grid's interconnecting 6-mile transmission line is a Major Energy Facility requiring review and approval by the Energy Facility Siting Board.

Intervention in PUC proceedings is governed by PUC Rule 1.13. Since Invenergy's proposed generating facility will be connected to National Grid's transmission line and switching station, National Grid is seeking intervention pursuant to PUC Rule 1.13(b)(2) as its interests are

directly affected by this proceeding, are not adequately represented by the existing parties, and the PUC's decision in this proceeding may be binding on National Grid.<sup>1</sup>

WHEREFORE, National Grid hereby respectfully requests to be granted leave to intervene in this proceeding as a full party.

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID

By its attorney,



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Bess Gorman #8751  
Assistant General Counsel  
National Grid USA Service Company, Inc. d/b/a  
National Grid  
40 Sylvan Road  
Waltham, MA 02451  
[Bess.Gorman@nationalgrid.com](mailto:Bess.Gorman@nationalgrid.com)  
Telephone: (781) 907-1834  
Facsimile: (781) 907-5701

CERTIFICATE OF SERVICE

I hereby certify that on the 6<sup>th</sup> day of April, 2016, I sent a copy of the foregoing Motion to Intervene to the attached service lists by electronic mail.



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Bess B. Gorman

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<sup>1</sup> The EFSB granted National Grid's motion to intervene in Docket SB 2015-06 on January 12, 2016.

**SB-2015-06 Invenergy CREC Service List as of 03/10/2016**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone/FAX</b>
<b>File an original and 10 copies with EFSB:</b> 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	<a href="mailto:Todd.Bianco@puc.ri.gov">Todd.Bianco@puc.ri.gov</a> ;	401-780-2106
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a> ;	
	<a href="mailto:Margaret.Curran@puc.ri.gov">Margaret.Curran@puc.ri.gov</a> ;	
	<a href="mailto:janet.coit@dem.ri.gov">janet.coit@dem.ri.gov</a> ;	
	<a href="mailto:kimberly.Crabill@doa.ri.gov">kimberly.Crabill@doa.ri.gov</a> ;	
	<a href="mailto:susan.forcier@dem.ri.gov">susan.forcier@dem.ri.gov</a> ;	
	<a href="mailto:rayna.maguire@dem.ri.gov">rayna.maguire@dem.ri.gov</a> ;	
<b>Parties (Electronic Service Only, Unless by Request)</b>		
Invenergy Thermal Development LLC Alan Shoer, Esq. Richard Beretta, Esq. Elizabeth Noonan, Esq. Nicole Verdi, Esq. Adler, Pollock & Sheehan One Citizens Plaza, 8 <sup>th</sup> Floor Providence, RI 02903	<a href="mailto:ashoer@apslaw.com">ashoer@apslaw.com</a> ;	401-274-7200
	<a href="mailto:rberetta@apslaw.com">rberetta@apslaw.com</a> ;	
	<a href="mailto:enoonan@apslaw.com">enoonan@apslaw.com</a> ;	
	<a href="mailto:nverdi@apslaw.com">nverdi@apslaw.com</a> ;	
	<a href="mailto:jniland@invenergylc.com">jniland@invenergylc.com</a> ;	312-224-1400
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	<a href="mailto:Tthomas@invenergylc.com">Tthomas@invenergylc.com</a> ;	
Town of Burrillville Michael McElroy, Esq., Special Counsel Leah Donaldson, Esq., Special Counsel Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	<a href="mailto:Michael@mcelroylawoffice.com">Michael@mcelroylawoffice.com</a> ;	401-351-4100
	<a href="mailto:leah@mcelroylawoffice.com">leah@mcelroylawoffice.com</a> ;	
	<a href="mailto:Nikolyszyn@gmail.com">Nikolyszyn@gmail.com</a> ;	401-474-4370
Oleg Nikolyszyn, Esq., Town Solicitor 155 South Main St., Suite 303 Providence, RI 02903		
Conservation Law Foundation Jerry Elmer, Esq. Max Greene, Esq. 55 Dorrance Street Providence RI, 02903	<a href="mailto:Jelmer@clf.org">Jelmer@clf.org</a> ;	401-351-1102
	<a href="mailto:Mgreene@clf.org">Mgreene@clf.org</a> ;	
Ms. Bess B. Gorman, Esq. Assistant General Counsel and Director Legal Department, National Grid 40 Sylvan Road Waltham, MA 02451	<a href="mailto:Bess.Gorman@nationalgrid.com">Bess.Gorman@nationalgrid.com</a> ;	781-907-1843

Office of Energy Resources Andrew Marcaccio, Esq. Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	401-222-3417
	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ;	401-574-9100
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
Rhode Island Building and Construction Trades Council Gregory Mancini, Esq. Sinapi Law Associates, Ltd. 2374 Post Road, Suite 201 Warwick, RI 02886	<a href="mailto:gmancinilaw@gmail.com">gmancinilaw@gmail.com</a> ;	401-739-9690
Residents of Wallum Lake Road, Pascoag, RI Dennis Sherman and Kathryn Sherman Christian Capizzo, Esq. Shechtman Halperin Savage, LLP 1080 Main Street Pawtucket, RI 02869	<a href="mailto:ccapizzo@shslawfirm.com">ccapizzo@shslawfirm.com</a> ;	401-272-1400
	<a href="mailto:kags8943@gmail.com">kags8943@gmail.com</a> ;	
Residents of Wallum Lake Road, Pascoag, RI Paul Bolduc and Mary Bolduc Joseph Keough Jr., Esq. 41 Mendon Avenue Pawtucket, RI 02861  Paul and Mary Bolduc 915 Wallum Lake Road Pascoag, RI 02859	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
	<a href="mailto:oatyssl@verizon.net">oatyssl@verizon.net</a> ;	401-529-0367
<b>Interested Persons (Electronic Service Only)</b>		
Peter Nightingale, member Fossil Free Rhode Island 52 Nichols Road Kingston, RI 02881	<a href="mailto:divest@fossilfreeri.org">divest@fossilfreeri.org</a> ;	401-789-7649
Sister Mary Pendergast, RSM 99 Fillmore Street Pawtucket, RI 02860	<a href="mailto:mpendergast@mercyne.org">mpendergast@mercyne.org</a> ;	401-724-2237
Patricia J. Fontes, member Occupy Providence 57 Lawton Foster Road South Hopkinton, RI 02833	<a href="mailto:Patfontes167@gmail.com">Patfontes167@gmail.com</a> ;	401-516-7678
Burrillville Land Trust Marc Gertsacov, Esq. Law Offices of Ronald C. Markoff 144 Medway Street Providence, RI 02906	<a href="mailto:marc@ronmarkoff.com">marc@ronmarkoff.com</a> ;	401-272-9330

Paul Roselli, President Burrillville Land Trust PO Box 506 Harrisville, RI 02830	<a href="mailto:proselli@cox.net">proselli@cox.net</a> ;	401-447-1560
Rhode Island Progressive Democrats of America Andrew Aleman, Esq. 168 Elmgrove Avenue Providence, RI 02906	<a href="mailto:andrew@andrewaleman.com">andrew@andrewaleman.com</a> ;	401-429-6779
Fighting Against Natural Gas and Burrillville Against Spectra Expansion Jillian Dubois, Esq. The Law Office of Jillian Dubois 91 Friendship Street, 4 <sup>th</sup> Floor Providence, RI 02903	<a href="mailto:jillian.dubois.esq@gmail.com">jillian.dubois.esq@gmail.com</a> ;	401-274-4591
Burrillville Town Council c/o Louise Phaneuf, Town Clerk 105 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:lphaneuf@burrillville.org">lphaneuf@burrillville.org</a> ;	401-568-4300
Thomas J. Kravitz, Town Planner Town of Burrillville 144 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:tkravitz@burrillville.org">tkravitz@burrillville.org</a> ;	401-568-4300
Michael C. Wood, Town Manager Town of Burrillville 105 Harrisville Main Street Harrisville, RI 02830	<a href="mailto:mcwood@burrillville.org">mcwood@burrillville.org</a> ;	401-568-4300 ext. 115
Mr. Leo Wold, Esq. Department of Attorney General 150 South Main Street Providence, RI 02903	<a href="mailto:LWold@riag.ri.gov">LWold@riag.ri.gov</a> ;	401-274-4400
Public Utilities Commission Cynthia Wilson Frias, Esq., Dep. Chief of Legal Alan Nault, Rate Analyst	<a href="mailto:Cynthia.Wilsonfrias@puc.ri.gov">Cynthia.Wilsonfrias@puc.ri.gov</a> ;	401-941-4500
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
Division of Public Utilities and Carriers John J. Spirito, Esq., Chief of Legal Steve Scialabba, Chief Accountant Tom Kogut, Chief of Information	<a href="mailto:john.spirito@dpuc.ri.gov">john.spirito@dpuc.ri.gov</a> ;	401-941-4500
	<a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:thomas.kogut@dpuc.ri.gov">thomas.kogut@dpuc.ri.gov</a> ;	
Matthew Jerzyk, Deputy Legal Counsel Office of the Speaker of the House State House, Room 302 Providence RI, 02903	<a href="mailto:mjerzyk@rilin.state.ri.us">mjerzyk@rilin.state.ri.us</a> ;	401-222-2466
Hon. Cale Keable, Esq., Representative of Burrillville and Glocester	<a href="mailto:Cale.keable@gmail.com">Cale.keable@gmail.com</a> ;	401-222-2258
Nick Katkevich	<a href="mailto:nkatkevich@gmail.com">nkatkevich@gmail.com</a> ;	

Ambar Espinoza	<a href="mailto:aespinoza@ripr.org">aespinoza@ripr.org</a> ;	
Joseph Bucci, Acting Administrator Highway and Bridge Maintenance Operations RI Department of Transportation	<a href="mailto:joseph.bucci@dot.ri.gov">joseph.bucci@dot.ri.gov</a> ;	
Jared Rhodes, Chief Statewide Planning Program	<a href="mailto:jared.rhodes@doa.ri.gov">jared.rhodes@doa.ri.gov</a> ;	
Doug Gablinske, Executive Director TEC-RI	<a href="mailto:doug@tecri.org">doug@tecri.org</a> ;	
Tim Faulkner ecoRI News 111 Hope Street Providence, RI 02906	<a href="mailto:tim@ecori.org">tim@ecori.org</a> ;	401-330-6276
Robert Tormey Conanicut Energy, LLC	<a href="mailto:rjtormey@conanicutenergy.com">rjtormey@conanicutenergy.com</a> ;	617-306-1601
Sally Mendzela	<a href="mailto:salgalpal@hotmail.com">salgalpal@hotmail.com</a> ;	

**Docket No. 4609 – PUC Advisory Opinion Regarding Need to Construct the Clear River Energy Facility  
Service List as of 03/23/2016**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
<b>Invenergy Thermal Development LLC (Clear River Energy Facility)</b> Alan Shoer, Esq. Richard Beretta, Esq. Elizabeth Noonan, Esq. Nicole Verdi, Esq. Adler, Pollock & Sheehan One Citizens Plaza, 8 <sup>th</sup> Floor Providence, RI 02903  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	<a href="mailto:ashoer@apslaw.com">ashoer@apslaw.com</a> ;	401-274-7200
	<a href="mailto:rberetta@apslaw.com">rberetta@apslaw.com</a> ;	
	<a href="mailto:enoonan@apslaw.com">enoonan@apslaw.com</a> ;	
	<a href="mailto:nverdi@apslaw.com">nverdi@apslaw.com</a> ;	
	<a href="mailto:jniland@invenergylle.com">jniland@invenergylle.com</a> ;	312-224-1400
	<a href="mailto:Tthomas@invenergylle.com">Tthomas@invenergylle.com</a> ;	
<b>Division of Public Utilities and Carriers</b> Leo Wold, Esq. Department of Attorney General 150 South Main Street Providence, RI 02903	<a href="mailto:LWold@riag.ri.gov">LWold@riag.ri.gov</a> ;	401-274-4400
	<a href="mailto:Jmunoz@riag.ri.gov">Jmunoz@riag.ri.gov</a> ;	
	<a href="mailto:Dmacrae@riag.ri.gov">Dmacrae@riag.ri.gov</a> ;	
John J. Spirito, Esq., Chief of Legal Steve Scialabba, Chief Accountant	<a href="mailto:john.spirito@dpuc.ri.gov">john.spirito@dpuc.ri.gov</a> ;	401-941-1400
	<a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:Don.ledversis@dpuc.ri.gov">Don.ledversis@dpuc.ri.gov</a> ;	
Seth Parker Boris Shapiro Levitan & Associates, Inc. 100 Summer Street Suite 3200 Boston, MA 02110	<a href="mailto:sgp@levitan.com">sgp@levitan.com</a> ;	617-531-2818
	<a href="mailto:bls@levitan.com">bls@levitan.com</a> ;	
<b>Office of Energy Resources</b> Andrew Marcaccio, Esq. Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	401-222-3417
	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ;	401-574-9100
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
<b>Statewide Planning Program</b> Jared Rhodes, Chief Statewide Planning Program	<a href="mailto:Jared.rhodes@doa.ri.gov">Jared.rhodes@doa.ri.gov</a> ;	401-222-5731
<b>Conservation Law Foundation (CLF)</b> Jerry Elmer, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	401-351-1102 Ext. 2012



<b>RI Building and Construction Trades Council</b> Gregory A. Mancini, Esq. Sinapi Law Associates, Ltd. 2374 Post Road, Suite 201 Warwick, RI 02886	<a href="mailto:gmancinilaw@gmail.com">gmancinilaw@gmail.com</a> ;	<b>401-739-9690</b>
<b>Public Utilities Commission (PUC)</b> Luly E. Massaro, Commission Clerk 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.wilsonfrias@puc.ri.gov">Cynthia.wilsonfrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
Ambar Espinoza, RI Public Radio: RI's NPR	<a href="mailto:aespinoza@ripr.org">aespinoza@ripr.org</a> ;	401 519-0233