

# 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

October 16, 2017

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

Re: Invenenergy Thermal Development LLC and National Grid – Clear River Energy Center  
Burrillville Interconnection Project – PUC – Docket No. 4737

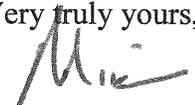
Dear Luly:

I am Special Counsel for the Town of Burrillville.

Enclosed for filing in this matter are an original and five copies of a 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/Invenenergy 4737 /Intervention*

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's :  
AND NATIONAL GRID's PROPOSED : DOCKET No. 4737  
BURRILLVILLE INTERCONNECTION PROJECT :

**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 Motion for Intervention in this Docket.

2. On or about September 19, 2017, the PUC opened this Docket No. 4737, on referral from the Energy Facility Siting Board (EFSB). In this Docket, the PUC will address certain issues pertaining to the pending application before the EFSB which would interconnect a new fossil-fuel-fired power plant in Burrillville, Rhode Island. The issues to be addressed by the PUC include the need for the transmission project and whether it is cost-justified.

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

4. 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."

5. Burrillville is the host community for the proposed plant and the proposed interconnection project. 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.

6. 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 . . .”.

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

8. 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.

Respectfully submitted,  
Town of Burrillville  
By its attorneys

  
\_\_\_\_\_  
William C. Dimitri, Esq. #2414  
Town Solicitor  
462 Broadway  
Providence, RI 02909-1626  
Tel: (401) 474-4370  
Fax: (401) 273-5290  
[dimitrilaw@icloud.com](mailto:dimitrilaw@icloud.com)

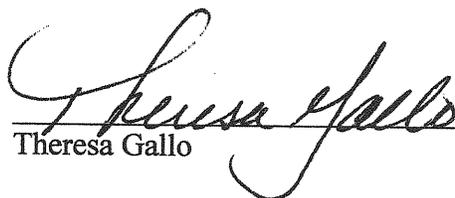


  
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Michael R. McElroy, Esq. #2627  
Leah J. Donaldson, Esq. #77M  
Special Counsel  
21 Dryden Lane  
P.O. Box 6721  
Providence, RI 02940-6721  
Tel: (401) 351-4100  
Fax: (401) 421-5696  
[Michael@McElroyLawOffice.com](mailto:Michael@McElroyLawOffice.com)  
[Leah@McElroyLawOffice.com](mailto:Leah@McElroyLawOffice.com)

Date: October 16, 2017

**CERTIFICATE OF SERVICE**

I certify that the original and five 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 October 16, 2017.

  
\_\_\_\_\_  
Theresa Gallo

**Docket No. 4737– PUC Advisory Opinion Regarding Burrillville Interconnection Project  
Service List as of 10/11/17**

<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	<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> ;	
John Niland, Dir. Of Business Development Tyrone Thomas, Esq., Asst. General Counsel Michael Blazer Invenergy Thermal Development LLC One South Wacker Drive, Suite 1900 Chicago, IL 60600	<a href="mailto:Tthomas@invenergylle.com">Tthomas@invenergylle.com</a> ;	312-224-1400
	<a href="mailto:Mblazer@invenergylle.com">Mblazer@invenergylle.com</a> ;	
<b>National Grid</b> George W. Watson, Esq. Peter Lacouture, Esq. Robinson & Cole LLP One Financial Plaza, Suite 1430 Providence, RI 02903	<a href="mailto:gwatson@rc.com">gwatson@rc.com</a> ;	401-709-3351
	<a href="mailto:placouture@rc.com">placouture@rc.com</a> ;	
Bess Gorman, Esq. National Grid USA Service Co. d/b/a National Grid 40 Sylvan Rd. Waltham, MA 02451	<a href="mailto:Bess.Gorman@nationalgrid.com">Bess.Gorman@nationalgrid.com</a> ;	781-907-1834
	<a href="mailto:Mark.Rielly@nationalgrid.com">Mark.Rielly@nationalgrid.com</a> ;	781-907-2111
<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> ;	401-780-2152
	<a href="mailto:Jonathan.schrag@dpuc.ri.gov">Jonathan.schrag@dpuc.ri.gov</a> ;	
	<a href="mailto:Macky.mccleary@dpuc.ri.gov">Macky.mccleary@dpuc.ri.gov</a> ;	
	<a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
	<a href="mailto:Kevin.lynch@dpuc.ri.gov">Kevin.lynch@dpuc.ri.gov</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> ;	
	<a href="mailto:Danny.musher@energy.ri.gov">Danny.musher@energy.ri.gov</a> ;	
<b>Statewide Planning Program</b>	<a href="mailto:Kevin.Nelson@doa.ri.gov">Kevin.Nelson@doa.ri.gov</a> ;	401-222-2093

Kevin Nelson Statewide Planning Program Jennifer Sternick, Esq. Chief of Legal Services, DOA	<a href="mailto:Jennifer.sternick@doa.ri.gov">Jennifer.sternick@doa.ri.gov</a> ;	401-222-8339
<b>Town of Burrillville</b> Michael McElroy, Esq. 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> ;	
William Dimitri, Esq. Town Solicitor - Burrillville	<a href="mailto:Dimitrilaw@icloud.com">Dimitrilaw@icloud.com</a> ;	401-273-9092
<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> ;	
Jerry Elmer, Esq. Conservation Law Foundation	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	401-351-1102 Ext. 2012
	<a href="mailto:mgreene@clf.org">mgreene@clf.org</a> ;	
Gregory A. Mancini, Esq. (RIBCTC) Sinapi Law Associates, Ltd.	<a href="mailto:gmancinilaw@gmail.com">gmancinilaw@gmail.com</a> ;	401-739-9690
Joseph A. Keough, Jr., Esq. Keough & Sweeney	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
Christian F. Capizzo, Esq. Partridge Snow & Hahn, LLP	<a href="mailto:cfc@psh.com">cfc@psh.com</a> ;	401-861-8200