

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

In Re: Invenergy Thermal Development LLC's :
Application to Construct the Clear River Energy : Docket No. 4609
Center in Burrillville, Rhode Island :

MOTION TO CHANGE HEARING LOCATION

The Town of Burrillville (“Town”), by and through its undersigned counsel, hereby respectfully requests that the Public Utilities Commission (“PUC”) move the hearings in this docket to a different location to accommodate the hundreds of citizens who will wish to attend.

There is immense interest by the Town's residents in the proceedings to be held by the PUC related to the Clear River Energy Center (power plant) on Wallum Lake Road in the Town. The enormity of the interest, along with the extraordinary number of residents that have appeared before the PUC and the Energy Facility Siting Board ("EFSB") during various public comment hearings, illustrates that there are hundreds of our residents that wish to observe the hearings, listen to the testimony of the many experts, and hear the arguments made by the various parties/intervenors. Our citizens are concerned that the proceedings are transparent and fair.

Of particular importance to the Town's residents is the location of the PUC hearings. Where available seating is so sparse as to effectively eliminate the public's attendance, the spirit of the Open Meetings Act is violated. *See* R.I.G.L. §42-46-1 et seq.

The reason for our concern, on behalf of the residents of the Town, is that Hearing Room A can only accommodate 100 total persons, per the Fire Marshall's order. The number of people on the service list for this docket exceeds 30, and the service list for the related EFSB docket exceeds 75. It is reasonable to conclude that the number of intervenors, their attorneys, the PUC itself, along with PUC staff will total almost 100 persons in attendance at the hearings. This

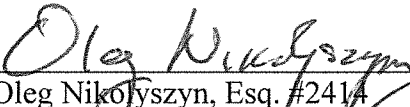

would leave few, if any, spaces available for the public, in particular the Town's residents, to attend the hearings.

Understanding that there are obstacles to overcome to find a forum large enough to accommodate the hundreds of citizens that desire to be present, e.g., school auditoriums of Community College of Rhode Island (CCRI) and Burrillville High School, there are other venues that can be considered. The State of Rhode Island has facilities that can accommodate a large number of people. For example, there is an auditorium at the Zombarano Hospital. Additionally, the State Legislature is not in session now, so the State House may be an available location. There may be others that could be considered also.


In order to avoid the appearance that this process is being closed off to the very people whose lives are most affected, on behalf of the residents of the Town, we respectfully request that the PUC move its hearings to a facility large enough to accommodate the hundreds of people whose lives could be seriously and negatively impacted by this facility.

TOWN OF BURRILLVILLE
By its attorneys

Dated: July 15, 2016


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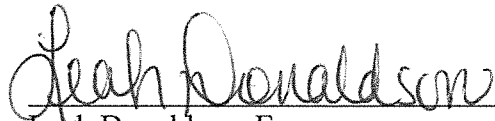
Dated: July 15, 2016



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CERTIFICATE OF SERVICE

I certify that the original and nine 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 July 15, 2016.



Leah Donaldson, Esq.