

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc. Resource Termination –
Clear River Unit 1

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Docket No. ER18-2457-000

TOWN OF BURRILLVILLE’S MOTION TO INTERVENE

Pursuant to Rule 214 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, and the Commission’s Combined Notice of Filings #1 dated September 21, 2018, the Town of Burrillville (“Town”), by and through its undersigned counsel, hereby moves to intervene as a full party in the above-captioned proceeding regarding ISO New England Inc.’s (“ISO-NE”) Resource Termination Filing for Clear River Unit 1. 18 C.F.R. § 385.214.

In support of this Motion, the Town states as follows:

I. STATEMENT OF INTEREST

A. Description of the Town of Burrillville

The Town is a beautiful, rural community located in the northwest corner of Rhode Island, bordered by Massachusetts and Connecticut. The Town has a land area of 57.3 square miles and a population of approximately 16,000 people.

The Town is the host community for the proposed combined-cycle electric generating facility, to be known as the Clear River Energy Center (“CREC”), which is the subject of this proceeding. The site for the proposed CREC facility is located on a parcel of land off Wallum Lake Road in Burrillville.

The Town is a municipal corporation operating under Town Council / Town Manager form of government with seven elected council members headed by a council president. The

Town Council and Town Manager are obligated to protect the health and welfare of all Town residents.

B. Grounds for Intervention

In 2015, Invenergy Thermal Development LLC filed an application before the Rhode Island Energy Facility Siting Board (“EFSB”) to build the proposed CREC facility in the Town. Invenergy’s application remains pending. The Town is a full party to the EFSB proceeding, as the host community for the proposed facility. The Town has staunchly opposed the approval of the CREC facility before the EFSB because, among other things, the Town and its experts believe the facility is not needed and would cause unacceptable environmental harm.

The Town and its residents will be directly impacted by the proposed CREC facility. 18 C.F.R. § 385.214(b)(ii). More than 1,000 property owners live within two miles of the proposed facility. Town residents have expressed countless concerns related to the proposed CREC facility during public comment opportunities before the EFSB, the Town Council, and other Town and State entities.

Further, as a public governmental body, the Town’s participation is in the public interest. 18 C.F.R. § 385.214(b)(iii). No other individual or organization can adequately represent the unique host community interests of the Town in this proceeding.

C. Position of the Town of Burrillville

The Town fully supports ISO-NE’s Resource Termination Filing for Clear River Unit 1.

The Town reserves the right to supplement this Motion to Intervene with additional comments and to request a formal hearing.

II. CONTACT INFORMATION

All communications, pleadings and orders related to this proceeding may be addressed to:

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III. CONCLUSION

For the reasons set forth above, the Town respectfully requests that its Motion to Intervene be granted and that the Town be given full party status in this proceeding.

TOWN OF BURRILLVILLE
By its attorneys

/s/ Leah J. Donaldson.
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CERTIFICATE OF SERVICE

Wherefore on this September 27, 2018, I caused to be served the foregoing Motion to Intervene electronically on all parties on the Commission's electronic service list in this proceeding, in accordance with Commission regulations.

/s/ Leah J. Donaldson