



**Bess B. Gorman**  
Assistant General Counsel & Director

December 16, 2015

By Hand Delivery

Todd Anthony Bianco  
Siting Board Coordinator  
Energy Facility Siting Board  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: Invenegy Thermal Development LLC — Clear River Energy Center  
Docket No. SB-2015-06

Dear Mr. Bianco:

Enclosed for filing in this matter is an original and ten (10) copies of the Motion To Intervene of The Narragansett Electric Company d/b/a National Grid. Copies have been served on the service list.

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

Sincerely,

A handwritten signature in black ink that reads "Bess Gorman".

Bess Beikoussis Gorman

cc: Service List  
Kevin Reardon  
Peter Lacouture, Esq.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD**

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

**DOCKET No.SB-2015-06**

**MOTION FOR INTERVENTION OF THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID**

Pursuant to Rule 1.10 of the Rules of Practice and Procedure of the Energy Facility Siting Board (EFSB), The Narragansett Electric Company d/b/a National Grid (National Grid), respectfully files this Motion for Intervention. On November 17, 2015, the EFSB opened Docket SB-2015-06, regarding the proposal of Invenergy Thermal Development LLC's ("Invenergy") to site a 900 megawatt (MW) gas-fired combined-cycle electricity generating facility in Burrillville, Rhode Island. In its Application to the Rhode Island Energy Facility Siting Board, Invenergy represents 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 of the Energy Facility Siting Board.

Intervention in EFSB proceedings is governed by EFSB Rule 1.10. 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 EFSB Rule 1.10(b)(2) as its interests are directly affected by this proceeding, are not adequately represented by the existing parties, and the Board's action in the proceeding may be binding on National Grid.

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



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

CERTIFICATE OF SERVICE

I hereby certify that on the 16<sup>th</sup> day of December, 2015, I sent a copy of the foregoing to the attached service list by first class mail postage prepaid.



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Bess Gorman

**SB-2015-06 Invenergy CREC Service List as of 12/08/2015**

Name/Address	E-mail	Phone/FAX
<p><b>File an original and 10 copies with EFSB:</b>            Todd Bianco, Coordinator            Energy Facility Siting Board            89 Jefferson Boulevard            Warwick, RI 02888</p> <p>Margaret Curran, Chairperson            Janet Coit, Board Member            Assoc. Dir., Div. of Planning c/o Kim Crabill            Patti Lucarelli Esq., Counsel            Susan Forcier Esq., Counsel            Rayna Maguire, Asst. to the Director            DEM</p>	<p><a href="mailto:Todd.Bianco@puc.ri.gov">Todd.Bianco@puc.ri.gov</a>;  <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>;</p>	<p>401-780-2106</p>
<b>Parties</b>		
<p>Invenergy Thermal Development LLC            Alan Shoer, Esq.            Richard Beretta, Esq.            Adler, Pollock &amp; Sheehan            One Citizens Plaza, 8th Floor            Providence, RI 02903</p>	<p><a href="mailto:ashoer@apslaw.com">ashoer@apslaw.com</a>;  <a href="mailto:rberetta@apslaw.com">rberetta@apslaw.com</a>;</p>	<p>401-274-7200</p>
<p>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</p>	<p><a href="mailto:jniland@invenergyllc.com">jniland@invenergyllc.com</a>;  <a href="mailto:TThomas@invenergyllc.com">TThomas@invenergyllc.com</a>;</p>	<p>312-224-1400</p>
<p>Conservation Law Foundation            Jerry Elmer, Esq.            Max Greene, Esq.            55 Dorrance Street            Providence RI, 02903</p>	<p><a href="mailto:JElmer@clf.org">JElmer@clf.org</a>;  <a href="mailto:MGreene@clf.org">MGreene@clf.org</a>;</p>	<p>401-351-1102</p>
<p>Town of Burrillville            Michael McElroy, Esq., Special Counsel            Schacht &amp; McElroy            PO Box 6721            Providence, RI 02940-6721</p>	<p><a href="mailto:Michael@mcelroylawoffice.com">Michael@mcelroylawoffice.com</a>;  <a href="mailto:m">m</a>;</p>	<p>401-351-4100</p>

Oleg Nikolyszyn, Esq., Town Solicitor 155 South Main St., Suite 303 Providence, RI 02903	<a href="mailto:Nikolyszyn@gmail.com">Nikolyszyn@gmail.com</a> ;	401-474-4370
<b>Interested Parties</b>		
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 L Alan Nault, Rate Analyst	<a href="mailto:Cynthia.Wilsonfrias@puc.ri.gov">Cynthia.Wilsonfrias@puc.ri.gov</a> ; v; <a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	401-941-4500
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> ; <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> ;	401-941-4500
Office of Energy Resources Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ; <a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	401-574-9100
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

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> ;	
Kathryn Sherman	<a href="mailto:kags8943@gmail.com">kags8943@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> ;	