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April 12, 2016

HAND-DELIVERED

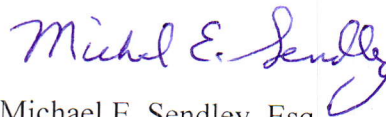
Todd Bianco, Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. SB-2015-06
Invenergy Thermal Development LLC – Clear River Energy Center

Dear Mr. Bianco:

Please be advised that this office represents David B. Harris. Enclosed please find an original and ten (10) copies of his Motion for Intervention. If you have any questions, please do not hesitate to contact me. Thank you.

Very truly yours,



Michael E. Sendley, Esq.

Enclosure

Cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

INVENERGY THERMAL DEVELOPMENT LLC
CLEAR RIVER ENERGY CENTER

DOCKET NO. SB-2015-06

MOTION TO INTERVENE BY ABUTTER, DAVID B. HARRIS

I. INTRODUCTION

Now comes David B. Harris, through counsel, (“the Movant” or “Mr. Harris”) and, pursuant to Section 1.10 of the Energy Facility Siting Board (“EFSB”) Rules of Practice and Procedure, hereby files this Motion for Intervention. The Movant is a resident who lives in the immediate vicinity of the above-referenced project site whose property abuts said site. The Movant’s intervention in the above-captioned matter is necessary, appropriate and in the public interest. Accordingly, this Motion to Intervene should be granted.

II. ARGUMENT

Section 1.10(b) of the EFSB Rules of Practice and Procedure provides that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Board”. The Movant, David B. Harris, resides on property that has approximately 290 feet of frontage on Wallum Lake Road and which is in the immediate vicinity of the proposed “Invenergy Clear River Energy Center Project” (“CREC”). Mr. Harris has invested hundreds of thousands of dollars into his property and he will be directly and adversely affected by this project should it proceed forward.

CREC will consist of a combined-cycle electric generating facility to be located at the Spectra Energy Algonquin Compressor Station site on Wallum Lake Road n Pascoag, RI. The project site is located in a predominantly rural area. Mr. Harris’ owns and resides on approximately 67 acres which has frontage on Wallum Lake Road (Route 100) directly across from the entrance to the proposed CREC project. His property is designated as lot 137-6 (62.43 acres) and lot 121-17 (5.7 acres) in the Town of Burrillville Land Records, and has a mailing address of 200 Manley Drive, Pascoag, RI. Mr. Harris’ property also has approximately 1000 feet of lake frontage on Wilson Reservoir and he has a road network in place for the development of a future campground.

Mr. Harris has a genuine interest in preserving his property and is deeply concerned about the adverse economic impact the CREC project will have on his property value and on the future use and enjoyment of his property. His other concerns about the CREC project include the negative impact of traffic, both during construction and during the operation of the site; the negative environmental impact; the health and safety of all residents in the vicinity; the purity of

air and water; and the aesthetic and recreational values of the community. The CREC project will have a negative impact on the rural character of the area and on future development.

In sum, the value of Mr. Harris' property will be severely and negatively impacted, more than any other resident in the immediate vicinity of this proposed project, and he will be deprived of the full use and enjoyment of his property should this project go forward.

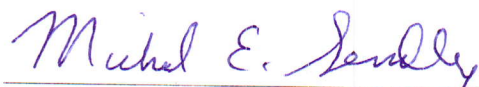
Finally, Mr. Harris' intervention in this matter is appropriate because his interests are not adequately represented or protected by any of the existing parties and he may be bound by the Board's action in these proceedings.

III. CONCLUSION

Based on the facts and arguments stated herein, David B. Harris respectfully requests that the EFSB grant this Motion for Intervention.

Respectfully submitted,

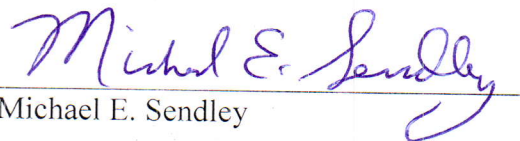
David B. Harris,
Through counsel,



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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of April, 2016, that I effectuated service of this Motion as required by the Invenergy CREC Service List as of March 10, 2016, a copy of which is attached hereto.



Michael E. Sendley