

Sister Mary Pendergast, RSM
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December 20, 2015

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY
SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC'S APPLICATION TO CONSTRUCT
THE CLEAR RIVER ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND—DOCKET NO.
SB-2015-06

I. MOTION FOR INTERVENTION OF MARY PENDERGAST, RSM

On November 17, 2015, the Energy Facility Siting Board (EFSB) opened Docket SB 2015-06, regarding the proposal of Invenergy to site a 900 MW gas-fired power plant in Burrillville, Rhode Island. The proposed power plant, fired by fossil fuels, would directly emit carbon-dioxide into the atmosphere. If one takes into account the full life cycle of the fossil fuels, one finds that the total carbon-dioxide equivalent of the emissions would produce greenhouse gases with a ruinous impact on Rhode Island and the global climate.

This motion adheres to form and content of EFSB Rule 1.10(c), and participation of aforementioned person, as defined in EFSB Rule 1.2.(r) in this proceeding, will be in the public interest within the meaning of EFSB Rule 1.10(b)(3).

II. COMMUNICATION AND CORRESPONDENCE

Service in this proceeding should be made upon, and communications should be directed to the following person:

Sister Mary Pendergast, RSM
99 Fillmore St
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Tel. 401.724.2237
Email: mpendergast@mercynes.org

III. INTERVENOR

Intervenor is a Sister of Mercy. This religious congregation worldwide will continue to work strategically to expose the realities of fracking's impacts on people and planet and to realize climate justice more broadly with other social movements and with the peoples on the ground. Sisters of Mercy have made an international ban on fracking a big priority.

A culture of care is part of intervenor's spirituality: care of Earth, and care of people who are poor. Pope Francis has called us all to an ecological conversion and he said it is essential and not an option.¹ He asks for a revolution of Mercy as well as a bold, cultural revolution. The Paris agreement is calling for an end to the fossil fuel era NOW! Yet the Burrillville plant will lock RI into fracked gas for the

¹Pope Francis, *Laudato Si'*, http://w2.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html

next 30 years. It is beyond time for the people to rise up, sure as the tulips we planted on Spectra.

IV. GROUNDS FOR INTERVENTION

Grounds for intervention comprise but are not limited to the following. Intervenor opposes all construction of new fossil-fuel infrastructure in Rhode Island as well as Invenergy's hydrofracked-gas-fired power plant in Burrillville in particular. The construction of this facility and the energy policy of which it is a manifestation would adversely impact the transition to an energy sector based on renewable energy.^{2,3}

Residents of Rhode Island are concerned about the fugitive methane⁴ emissions associated with the full life cycle of the fossil fuels required to operate the power plant, which will make it impossible for Rhode Island to contribute its fair share to the reduction of greenhouse gas emissions required to have a realistic chance to restore and preserve a habitable climate for present and future generations.^{5,6,7,8}

V. CONCLUSION

Intervenor has considerable interest and is invested in protecting the environment and public health in Rhode Island. Pursuant to EFSB Rule 1.10(b)(3), intervenor's intervention is in the public interest. No other party in this proceeding is likely to adequately protect the full range of these interests. Accordingly, Intervenor has a direct and substantial interest in the outcome of this application process. Pursuant to EFSB Rule 1.4(a), aforementioned intervenor will exercise the right to appear in any proceeding in person or by an attorney.

Respectfully submitted,



Sister Mary Pendergast, RSM

²Robert Howarth, *Methane emissions and climatic warming risk from hydraulic fracturing and shale gas development: implications for policy*, http://www.eeb.cornell.edu/howarth/publications/f.EECT-61539-perspectives-on-air-emissions-of-methane-and-climatic-warmin_100815.27470.pdf

³Concerned Health Professionals of NY, *Compendium of scientific, medical, and media findings demonstrating risks and harms of fracking unconventional gas and oil extraction*, page 109, <http://concernedhealthny.org/wp-content/uploads/2012/11/PSR-CHPNY-Compendium-3.0.pdf>

⁴*Ibid.* pages 108-118

⁵Art. I, Sec. 17, *Constitution of the State of Rhode Island and Providence Plantationas*

⁶*Brief of Amicus Curiae James Hansen*, <http://ourchildrenstrust.org/sites/default/files/Hansen%20Amicus%20.pdf>

⁷*Motion by Dr. James E. Hansen to appear as amicus curiae in support of appellants, for leave to enlarge the time for filing amicus brief, and for leave to file supporting material*, <http://www.divestproject.org/wp-content/uploads/2015/10/Hansen-Amicus.pdf>

⁸Judge Hollis R. Hill, *Order affirming Department of Ecology's denial of petition for rule making*, http://ourchildrenstrust.org/sites/default/files/15.11.19.Order_FosterV.Ecology.pdf