

Law Office of Jillian M. Dubois  
Attorney and Counselor at Law

December 22, 2015

BY HAND DELIVERY

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

Dear Mr. Bianco,

Enclosed for filing in this matter is an original and ten (10) copies of the Motion to Intervene of the Fighting Against Natural Gas (FANG) and Burrillville Against Spectra Expansion (BASE) organizations. Copies have been served on the service list.

Should you have any questions, please do not hesitate to contact me.

Thank you for your attention to this matter.

Respectfully,



Jillian M. Dubois, Esq.

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

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

**MOTION FOR INTERVENTION OF THE FIGHTING AGAINST NATIONAL  
GAS AND BURRILLVILLE AGAINST SPECTRA EXPANSION**

**I. INTRODUCTION**

Pursuant to Section 1.10(b)(3) of the Energy Facility Siting Board Rules of Practice and Procedure, Fighting Against Natural Gas (FANG) and Burrillville Against Spectra Expansion (BASE) respectfully files this Motion for Intervention. The Intervention of FANG and BASE in the above captioned matter is appropriate and in the public interest within the meaning of EFSB Rule 1.10(b)(3).

FANG and BASE are two organizations that have come together in joint association for the purposes of intervention in this Docket.

**II. ARGUMENT**

FANG and BASE seek to intervene based upon EFSB Rule 1.10(b), which states that "any person claiming a right to intervene or have an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Board." Further, the Rule states that "such right or interest may be conferred by statute; an interest in which may be directly affected and which is not adequately represented by the existing parties and as to which petitioners may be bound by the Board's action in the proceeding; any other interest of such nature that petitioner's participation may be in the public interest."

FANG and BASE are grassroots organizations whose membership includes many individuals living in the Town of Burrillville. These individuals have sought the help of FANG and BASE organizations in order to protect their property rights as well as to educate them as to the potential consequences derived from this expansion. The proposed gas-fired combined-cycle electricity generating facility in Burrillville, Rhode Island would emit large amounts of toxins, create noise disturbances and profoundly impact traffic patterns in Northwest Rhode Island.

BASE has been the leading voice and information resource in Burrillville with respect to the Invenergy power plant project. BASE has organized countless community meetings, ascertained vast amounts of information from residents that will be directly affected by the approval of this

Docket and actively worked with the community to obtain testing information regarding the noise and emission testing in Burrillville related to the impacts of local gas infrastructure.

In addition to BASE membership, FANG's membership includes many individuals in the northeast region that would be directly impacted by the greenhouse gas emissions and climate change that will occur as a result of this expansion. Such members are those which live in and represent communities in the Appalachian Basin upon which are being directly impacted by this process.

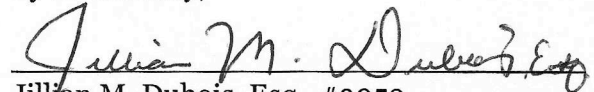
Regionally, FANG has been one of the main organizations advocating and organizing to halt Spectra Energy's "AIM" expansion project. Through this work FANG has developed relationships with communities from across the "Algonquin" pipeline path who are directly impacted from the expansions of the pipeline. Locally BASE has been the lead organization raising concerns about the impacts of the "AIM" project on the community of Burrillville. As Invenergy has stated, the Clear River Power Plant would directly lead to future expansions of the "Algonquin" Pipeline. FANG and BASE have a deep understanding of the "Algonquin" Pipeline and the permitting process for the expansions of it. Information which may come to bear as part of the Clear River Power Plant permitting process.

BASE and FANG have played an instrumental role in educating the community of Burrillville and the broader Rhode Island community on the impacts of fracked-gas infrastructure and advocating for safer alternatives. Through their membership, their organizing track record, their knowledge of the "Algonquin" Pipeline and their role as advocates for the community of Burrillville, it is critical that FANG and BASE are granted intervenor status in this Docket.

### **III. CONCLUSION**

WHEREFORE, for the foregoing reasons, FANG and BASE respectfully request that its motion to intervene in this Docket be granted.

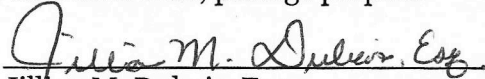
Fighting Against Natural Gas  
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By its attorney,



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CERTIFICATE OF SERVICE

I hereby certify that I filed the original and ten (10) copies of this Motion for Intervention with the Energy Facilities Siting Board via hand delivery. In addition, I hereby certify that I sent a copy of the foregoing to the attached service list by first class mail, postage prepaid

  
Jillian M. Dubois, Esq.

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

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