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July 29, 2016

Todd A. Bianco
Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

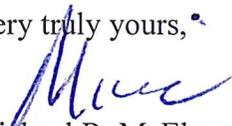
Re: Invenergy Thermal Development LLC – Clear River Energy Center
Docket No. SB-2015-06

Dear Todd:

Enclosed for filing in this matter are an original and ten (10) copies of a Motion for Clarification being filed by the Town of Burrillville in this docket. Electronic copies have been sent to the service list.

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

Very truly yours,



Michael R. McElroy

Cc: Service List

which the facility is proposed to be built. The existing Algonquin property is large and comprises over 750 acres of land.

It is also possible that the Board seeks the Assessor's opinion as to the impact on property values for all *affected* property owners.³ This would include not only abutting properties, but all properties within the zone that could be affected by noise, vibration, traffic, sight, or other disturbances related to the facility.⁴

Given the wide-range of possibilities regarding the Board's use of the term, please clarify what the Board means by the term "abutter."

(2) Does the Board intend for the study to encompass the Town as a whole?

The Assessor also seeks clarification regarding the extent to which the entire Town as a whole needs to be studied, if at all.

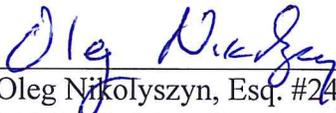
WHEREFORE, the Town respectfully requests clarification from the Board on the two issues detailed above.

³ For example, the Federal Energy Regulatory Commission (FERC) defines affected landowners as "owners of property interests, as noted in the most recent county/city tax records as receiving the tax notice, whose property: (i) is directly affected (i.e., crossed or used) by the proposed activity, including all facility sites (including compressor stations, well sites, and all above-ground facilities), rights of way, access roads, pipe and contractor yards, and temporary workspace; (ii) abuts either side of an existing right-of-way or facility site owned in fee by any utility company, or abuts the edge of a proposed facility site or right-of-way which runs along a property line in the area in which the facilities would be constructed, or contains a residence within 50 feet of the proposed construction work area; (iii) is within one-half mile of proposed compressors or their enclosures or LNG facilities; or (iv) is within the area of proposed new storage fields or proposed expansions of storage fields, including any applicable buffer zone." 18 CFR 157.6(d)(2)

⁴ For example, property from which project infrastructure, such as the smoke stack and its plume, can be seen.

TOWN OF BURRILLVILLE
By its attorneys

Dated: July 29, 2016



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by MRMc

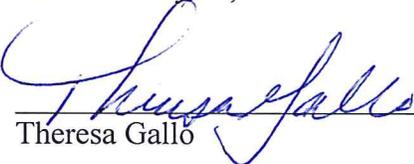
Dated: July 29, 2016



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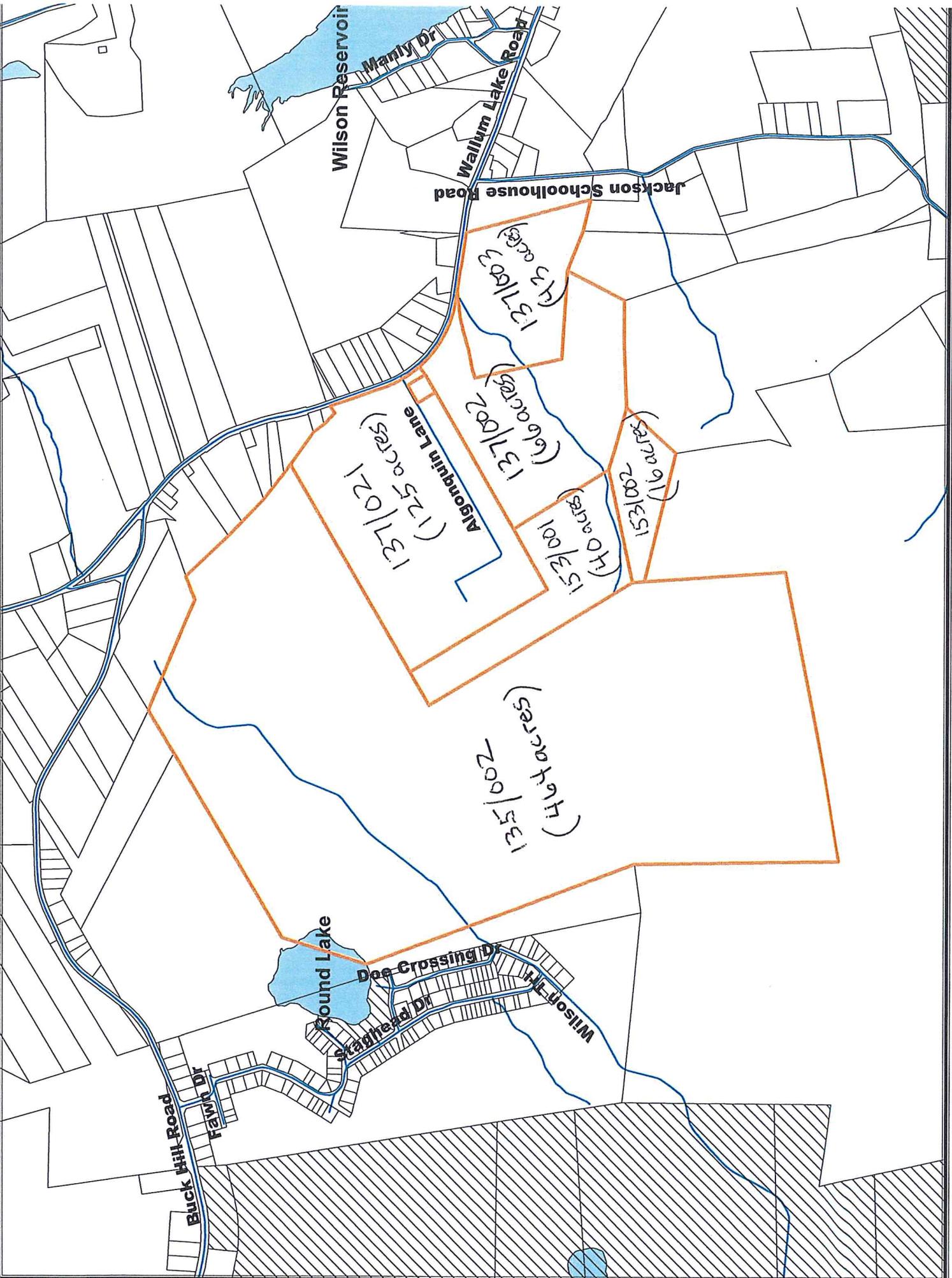
CERTIFICATE OF SERVICE

I certify that the original and ten photocopies of this Motion were filed by U.S. Mail, postage prepared, with the Coordinator of the EFSB, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies of this Motion were served via email on the service list for this docket. I certify that all of the foregoing was done on July 29, 2016.



Theresa Gallo

Exhibit A



Wilson Reservoir

Manly Dr

Wallum Lake Road

Jackson Schoolhouse Road

Algonquin Lane
137/021
(12.5 acres)

137/022
(6.6 acres)

137/023
(4.3 acres)

153/001
(4.0 acres)

200/051
(9.17 acres)

153/052
(6.4 acres)

Round Lake

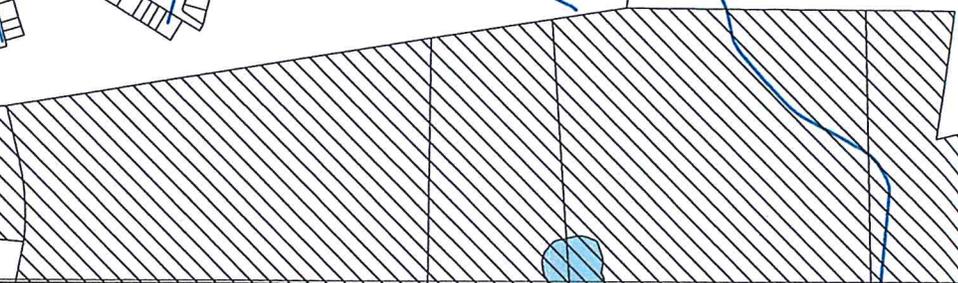
Doe Crossing Dr

Staghead Dr

Wilson

Buck Hill Road

Fawn Dr



SB-2015-06 Invenergy CREC Service List as of 07/22/2016

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