

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

**In Re: INVENERGY THERMAL DEVELOPMENT )  
LLC’S APPLICATION TO CONSTRUCT THE )     Docket No. SB-2015-06  
CLEAR RIVER ENERGY CENTER IN )  
BURRILLVILLE, RHODE ISLAND )**

**RESPONSE OF INVENERGY THERMAL DEVELOPMENT LLC  
TO THE TOWN OF CHARLESTOWN’S NOVEMBER 20, 2017 MOTION**

Now comes Invenergy Thermal Development LLC (“Invenergy”) and hereby responds to the Town of Charlestown’s (“Charlestown’s”) November 20, 2017 Motion for “clarification/instructions and/or for an extension.” *See* Charlestown’s Nov. 20, 2017 Motion (“the Motion”). This Motion appears to be rendered moot by actions taken by the Energy Facility Siting Board (“EFSB” or “Board”) during the November 27, 2017 hearings. Invenergy asked Charlestown if it would be withdrawing its Motion and was advised it would not. Invenergy respectfully submits that because final hearings have been delayed ninety (90) days, Charlestown has been provided sufficient time to submit limited pre-filed testimony. Accordingly, Invenergy takes the position that Charlestown’s Motion is now moot as Charlestown’s proposed schedule can be accommodated.

Respectfully submitted,  
INVENERGY THERMAL DEVELOPMENT LLC  
By Its Attorneys:

/s/ Alan M. Shoer  
Alan M. Shoer, Esq. (#3248)  
Richard R. Beretta, Jr., Esq. (#4313)  
Elizabeth M. Noonan, Esq. (#4226)  
Nicole M. Verdi, Esq. (#9370)  
ADLER POLLOCK & SHEEHAN, P.C.  
One Citizens Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903-1345  
Tel: 401-274-7200  
Fax: 401-351-0607

Dated: November 27, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2017, I delivered a true copy of the foregoing document to the Energy Facilities Siting Board via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer