

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: Application of
Invenergy Thermal Development LLC's
Proposal for Clear River Energy Center

Docket No. SB 2015-06

MOTION FOR INTERVENTION
OF RHODE ISLAND PROGRESSIVE DEMOCRATS OF AMERICA

I. Introduction

The Rhode Island Progressive Democrats of America ("RIPDA"), pursuant to Energy Facility Siting Board ("EFSB" or "Board") Rule of Practice and Procedure 1.10(b)(2) and (3), respectfully files its Motion for Intervention in this Docket.

On November 17, 2015, the EFSB opened Docket No. SB 2015-06, regarding the proposal of Invenergy Thermal Development LLC's ("Invenergy") to construct the Clear River Energy Center (the "Plant"). The proposed energy center would primarily consist of a 900 megawatt (MW) gas-fired power plant. Because the proposed Energy Center would emit additional carbon into the atmosphere, the construction and operation of the Energy Center would contribute to climate change. The operation of the Energy Center would also increase noise pollution, burden an already overburdened road infrastructure, impact local infrastructure and wildlife.

RIPDA's participation in this proceeding will be in the public interest within the meaning of EFSB Rule 1.10(b)(2) and (3).

II. The Intervenor

RIPDA is one of Rhode Island's key political action committees. Since 2004, Progressive Democrats of America ("PDA") has actively been engaged in environmental protection, with an

emphasis on ending fracking and supporting green energy, protection of the public good and economic justice. In 2008, RIPDA was formed as a local state chapter of PDA to focus on issues affecting Rhode Island and to propagate the national platform at the state level. RIPDA is a registered political action community who has members throughout Rhode Island, including in the town of the proposed Energy Center. RIPDA organization office is 168 Elmgrove Ave, Providence.

RIPDA promotes clean and affordable energy solutions in Rhode Island. As part of its' mission RIPDA has been actively advocating for their goals through local and statewide legislative action, demonstration and testimony to the general assembly. Recently, RIPDA members have spearheaded and have been apart of events to promote the awareness of the consequences of natural gas, and other fossil fuels.

III. The Standard Governing this Motion

Intervention in EFSB proceedings is governed by EFSB Rule 1.10. RIPDA bases its motion on the provisions of Rule 1.10(b) which states that a party may intervene where “necessary” or “appropriate” if the party has “any other interest of such nature that petitioner’s participation may be in the public interest.

IV. RIPDA Interest in This Proceeding

RIPDA has extensive understanding of the issues affecting Rhode Islander’s, such as how gas and electricity markets affect the cost of electricity and thus economic security of every Rhode Islander. RIPDA has been active organization in legislative advocacy and an advocate of enforcement of state regulations. Recently, RIPDA was instrumental in the research and enforcement of a multi-state actions against the National Rifle Association (“NRA”) for their

violation of campaign finance laws. In Rhode Island, RIPDA successfully brought a complaint to the Board of Elections, that resulted in the 2nd largest campaign finance fine in the state.

Even though RIPDA has not previously appeared before the board, RIPDA has participated in a multitude of hearings, from local council hearings to hearing before the General Assembly of Rhode Island. As a result, RIPDA can play an insightful and helpful role in this docket.

In this particular docket, Invenergy presented before the EFSB an application that has multiple layers of economic and environmental consequences not only for Rhode Islanders but for its neighbors. RIPDA is a unique position to offer information about the economic and environmental consequences of this multifaceted application. In particular because RIPDA is a statewide organization with members across a multitude of towns, it can not only offer a state analysis but also a unique local perspective.

In considering the proposal for the new Plant, the Board may consider the Climate Change Coordinating Council. In addition to the council's duty to coordinate the reduction of emissions, the council is tasked with setting a plan to reduce greenhouse gas emissions in (1) 10% below 1990 levels by 2020; (2) 45% below 1990 levels by 2035 and (3) 80% below 1990 levels by 2050. (R.I. Gen. Laws 42-6.2-1)

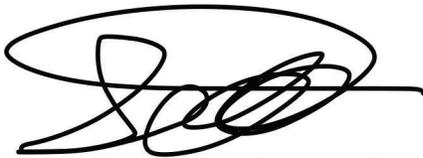
RIPDA has resources, institutional knowledge and the human capital to present factual evidence and background information that will be directly relevant to the proceeding, useful to the EFSB, and in the interest of the public and all Rhode Islanders.

Moreover, the participation in this proceeding of a political action committee such as RIPDA will serve the public interest. Whereas, the public interest, in this case, is best served by

diversity of viewpoints, and RIPDA is well suited to provide the Board with background on the environmental and societal impact of the Plant. See, generally, Buckley, supra, at 14, 96 S.Ct. 612 (“Discussion of public issues and debate on the qualifications of candidates are integral to the operation of the system of government established by our Constitution”). Citizens United v. Fed. Election Comm'n, 558 U.S. 310, 340, 130 S. Ct. 876, 898, 175 L. Ed. 2d 753 (2010).

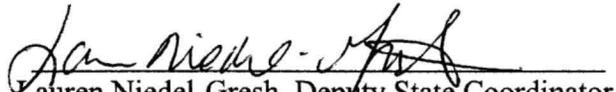
V. Conclusion

WHEREFORE, for the foregoing reasons, RIPDA respectfully requests that its motion to intervene in this Docket be granted. Pursuant to EFSB Rule 1.4(a), aforementioned intervenor will exercise the right to appear in any proceeding in person or by an attorney.



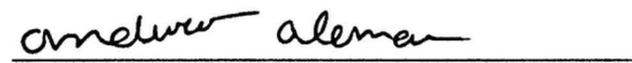
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CERTIFICATE OF SERVICE

I certify that the original and nine copies of this Motion was filed with the Energy Facility Siting Board. In addition, a PDF version of this Motion was served electronically on the service list of this Docket, as that list was provided by the EFSB on December 22, 2015. I certify that all of the foregoing was done on December 22, 2015.



Andrew Aleman, Esq.