

**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 )**

**OBJECTION OF INVENERGY THERMAL DEVELOPMENT  
LLC TO THE TOWN OF BURRILLVILLE’S NOVEMBER 15, 2017 REPLY**

Now comes Invenergy Thermal Development LLC (“Invenergy”) and hereby objects to the Town of Burrillville’s (“Town’s”) November 15, 2017 Reply to Invenergy’s Objection to the Town’s Motion to Dismiss and to Invenergy’s Objection to the Town’s Supplemental Memorandum, requesting the Rhode Island Energy Facility Siting Board (“EFSB” or “Board”) dismiss Invenergy’s EFSB Application. The Town’s November 15, 2017 Reply failed to raise any additional claims and/or allegations that were not previously addressed by and responded to in Invenergy’s Objection to the Town’s Motion to Dismiss and Invenergy’s Objection to the Town’s Supplemental Memorandum. Accordingly, the Town’s Motion to Dismiss should be denied.

Respectfully submitted,  
INVENERGY THERMAL DEVELOPMENT LLC  
By Its Attorneys:

/s/ Alan M. Shoer  
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Dated: November 20, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 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