



Burrillville Land Trust

Protecting our open space and rural character
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December 18, 2017

Chairman Cale Keable
Energy Facility Siting Act Study Commission
Rhode Island State House, Providence, Rhode Island

Dear Chairman Keable:

Thank you for chairing the Energy Facility Siting Act Study Commission and for requesting written comment from those impacted by the decisions of the current Energy Facility Siting Board (EFSB). The Burrillville Land Trust (BLT) board of directors recommends the following changes to the Rhode Island Public Utility Commission Energy Facility Siting Board:

1. The EFSB will no longer accept any and all fossil fuel power plants applicants for the production of electricity;
2. The EFSB will be authorized to accept as alternatives to fossil fuel power plants the following: energy efficiency programs, solar and wind projects and ways of subsidizing the costs;
3. The EFSB will be authorized to use location as their primary focus in determining the permitting and siting of a power generating or power transmission facility;
4. The EFSB will be authorized to combine dockets - transmission wires necessary for power plants, for example;
5. The EFSB will be authorized to reject applicants proposing to build on sites that have already been historically rejected by other state agencies or boards;
6. All projects over 40MWs in name plate generating capacity must include an Environmental Impact Statement, an Environmental Impact Assessment or an Environmental Impact Document;
7. The EFSB will include members from all state agencies, if necessary. That includes RI DOH, DOT, DEM, Statewide Planning, OER and more;
8. The number of EFSB board members will expand or contract based on the size and scale of the project - 9 may be needed for transmission wires along an existing corridor while up to 30 may be needed for large scale energy projects;
9. The EFSB board members will include one member (usually an attorney) who will represent the interests of the citizens of the affected community - this attorney will be authorized to send data requests, subpoena expert witnesses, cross-examine witnesses, etc. This attorney would have a seat at the EFSB;

10. The EFSB will ask applicants for a pre-application that identifies key issues and initiates dialogue between the affected parties (New York's Board on Electric Generation Siting). Each party receives a neutral facilitator who mediates disputes;
11. The RI PUC through the EFSB will provide funds to interested local groups ensuring they can fully participate in the adjudication process;
12. The applicant will provide funds as a means of funding the EFSB staff;
13. Give the EFSB the authority to combine dockets from other projects - LNG/power plants, power lines, compressor station improvements, substation expansion
14. Expand public hearings to include a portion of each public hearing for written data requests from the public. Public data requests would be answered by the applicant and forwarding the answers to the public liaison; and,
15. The EFSB will be comprised of members from existing state and local agencies, impacted community members, neutral experts, a public liaison, and representatives from the RI House and Senate.

Sincerely,

Paul A. Roselli

President - Burrillville Land Trust