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January 9, 2018

By electronic filing

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re:

In Re: Algonquin Gas Transmission, LLC

Docket No. CP18-23-000

Dear Secretary Bose:

Enclosed for filing in this matter please find the Town of Burrillville's Motion to Intervene in this proceeding. Electronic copies have been sent to the service list.

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

Very truly yours,

Leah I Donaldson

Cc: Service List

UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

In re: Algonquin Gas Transmission, LLC

abbreviated application for approval to abandon

certain compression facilities for its Burrillville

Compressor Station Project

Docket No. CP18-23-000

TOWN OF BURRILLVILLE'S MOTION TO INTERVENE

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, and the Commission's Notice of Application dated December 20, 2017, the Town of Burrillville ("Town"), by and through its undersigned counsel, hereby moves to intervene as a full party in the above-captioned proceeding regarding Algonquin Gas Transmission, LLC's ("Algonquin") abbreviated application for approval to abandon certain compressor facilities for its Burrillville Compressor Station ("Application"). 18 C.F.R. § 385.214.

In support of this Motion, the Town states as follows:

I. STATEMENT OF INTEREST

A. Description of the Town of Burrillville

The Town is a beautiful, rural community located in the northwest corner of Rhode Island, bordered by Massachusetts and Connecticut. The Town has a land area of 57.3 square miles and a population of approximately 16,000 people.

The Town is the host community for the compressor station which is the subject of this proceeding ("Compressor Station"). The Compressor Station is located off Wallum Lake Road in Burrillville on a parcel of land owned by Algonquin. More than 1,000 property owners live within two miles of the Compressor Station.

The Town is a municipal corporation operating under Town Council / Town Manager form of government with seven elected council members headed by a council president. The Town Council and Town Manager are obligated to protect the health and welfare of all Town residents.

B. Grounds for Intervention

The Town and its residents will be directly impacted by Algonquin's proposed changes to the Compressor Station. 18 C.F.R. § 385.214(b)(ii). Further, as a public governmental body, the Town's participation is in the public interest. 18 C.F.R. § 385.214(b)(iii). No other individual or organization can adequately represent the unique host community interests of the Town in this proceeding.

Algonquin's Application seeks to modify the Compressor Station that is located in the Town. The Compressor Station currently consists of two compressor buildings, along with associated office/warehouse, auxiliary, fuel gas, garage, and products storage buildings. An original compressor building houses five compressor units and a newer compressor building houses one compressor unit.¹

Town residents who live in the vicinity of the Compressor Station have expressed concerns over the years about the noise and vibration attributable to the Compressor Station. The Town has also previously raised concerns with the Commission related to noise, air emissions, site security, and a lack of formal notification process regarding blowdowns and other on-site activities at the Compressor Station.

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¹ The original building contains three Clark TLA-8 gas engines installed in 1961, and two Solar T-7000 gas turbines installed in 1991. The newer building contains one Solar Mars 100 gas turbine installed in 2015. *See* Algonquin Response to Staff Environmental Data Request Dated April 28, 2014, Response 14, Docket Nos PF13-16-000 / CP14-96-000.

C. Position of the Town of Burrillville

The Town expects to take a position in this proceeding once the Town Council completes its review of Algonquin's Application. The Town reserves the right to supplement this Motion to Intervene with additional comments and to request a formal hearing on the Application.

II. **CONTACT INFORMATION**

All communications, pleadings, and orders related to this proceeding should be addressed

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III. **CONCLUSION**

to:

For the reasons set forth above, the Town respectfully requests that its Motion to Intervene be granted and that the Town be given full party status in this proceeding.

TOWN OF BURRILLVILLE

By its attorneys

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CERTIFICATE OF SERVICE

Wherefore on this January 9, 2018, I caused to be served the foregoing Motion to Intervene electronically on all parties on the Commission's electronic service list in this proceeding, in accordance with Commission regulations.