

Schacht & McElroy

Michael R. McElroy
Leah J. Donaldson

Attorneys at Law

Michael@McElroyLawOffice.com
Leah@McElroyLawOffice.com

Members of the Rhode Island
and Massachusetts Bars

21 Dryden Lane
Post Office Box 6721
Providence, RI 02940-6721

(401) 351-4100
fax (401) 421-5696

July 25, 2017

Todd Anthony Bianco
Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Re: Invenergy Thermal Development LLC – Clear River Energy Center
Docket No. SB-2015-06

Dear Dr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 32nd Set of Data Requests to Invenergy Thermal Development LLC. Electronic copies have been sent to the service list.

If you have any questions, please feel free to call.

Very truly yours,


Michael R. McElroy

MRMc:tmg

cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's :
APPLICATION TO CONSTRUCT THE CLEAR RIVER : DOCKET No. SB-2015-06
ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND :

**THE TOWN OF BURRILLVILLE'S 32nd SET OF DATA REQUESTS TO
INVENERGY THERMAL DEVELOPMENT LLC**

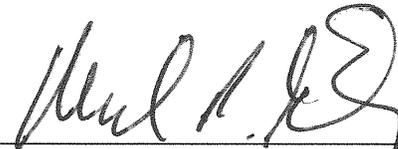
- 32-1 In the Clear River Economic Impacts: Overall Assumptions, please provide the following:
- a. Basis for the property tax or other land taxes and the calculations used to arrive at the property tax assumption.
 - b. Calculations and basis for the capacity factor assumption.
- 32-2 In regard to the Supply/Demand assumptions worksheet, please provide the following:
- a. Basis for the BTMPV amounts used in calculating Peak Demand – BTMPV:
 - b. Assumptions and/or calculations for change in Supply from 2017 through 2025.
 - c. If not identified above, provide the assumptions and calculations for the reduction in Demand Side Resources.
- 32-3 Are the assumptions for BTMPV consistent with the 2017 report? Please explain.
- 32-4 In developing its total energy and capacity market savings to Rhode Island ratepayers, please provide the following:
- a. Assumptions for the new transmission lines being built from Canada to satisfy ISO-NE load.
 - b. Assumptions for the new offshore wind projects being built to satisfy ISO-NE load.
 - c. Cost of energy assumed from the new transmission lines for each year of the economic analysis.
 - d. Cost of energy from offshore wind in each year of the economic analysis.
- 32-5 What is the legal name of the entity that was qualified by ISO-NE to participate in ISO's Forward Capacity Auction 10, and which obtained a Capacity Supply Obligation in FCA-10?
- 32-6 With regard to the entity referred to in 32-5, please state the form of entity (e.g., corporation, LLC, LLP, or other) and name the state in which the entity is chartered.

- 32-7 With regard to the entity referred to in 32-5, did the same legal entity participate in FCA-11?
- 32-8 If the answer to 32-7 is "no," please name any entity affiliated with the entity named in 32-5 that participated in FCA-11, and state the form of that entity.
- 32-9 In light of the litigation concerning the proposed Johnston water supply arrangement, have any attempts been made to secure an alternate water supply? If so, please provide details.

Respectfully submitted,
Town of Burrillville
By its attorneys



William C. Dimitri, Esq. #2414
Town Solicitor
462 Broadway
Providence, RI 02909-1626
Tel: (401) 474-4370
Fax: (401) 273-5290
dimitrilaw@icloud.com



Michael R. McElroy, Esq. #2627
Leah J. Donaldson, Esq. #7731
Special Counsel
21 Dryden Lane
P.O. Box 6721
Providence, RI 02940-6721
Tel: (401) 351-4100
Fax: (401) 421-5696
Michael@McElroyLawOffice.com
Leah@McElroyLawOffice.com

Date: July 25, 2017

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of July, 2017, I sent a copy of the foregoing to the attached service list.

Theresa Gallo

40 Sylvan Road Waltham, MA 02451 Mark Rielly, Esq. Senior Counsel	Mark.rielly@nationalgrid.com ;	
Office of Energy Resources Andrew Marcaccio, Esq. Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908 Ellen Cool Levitan & Associates	Andrew.Marcaccio@doa.ri.gov ;	401-222-3417
	Nicholas.Ucci@energy.ri.gov ;	401-574-9100
	Christopher.Kearns@energy.ri.gov ; egc@levitan.com ;	
	Brenna.McCabe@doa.ri.gov ;	
Rhode Island Building and Construction Trades Council Gregory Mancini, Esq. Sinapi Law Associates, Ltd. 2374 Post Road, Suite 201 Warwick, RI 02886	gmancinilaw@gmail.com ;	401-739-9690
Residents of Wallum Lake Road, Pascoag, RI Dennis Sherman and Kathryn Sherman Christian Capizzo, Esq. Shechtman Halperin Savage, LLP 1080 Main Street Pawtucket, RI 02869	ccapizzo@shslawfirm.com ;	401-272-1400
	kags8943@gmail.com ;	
Residents of Wallum Lake Road, Pascoag, RI Paul Bolduc and Mary Bolduc Joseph Keough Jr., Esq. 41 Mendon Avenue Pawtucket, RI 02861 Paul and Mary Bolduc 915 Wallum Lake Road Pascoag, RI 02859	jkeoughjr@keoughsweeney.com ;	401-724-3600
	oatyss1@verizon.net ;	401-529-0367
Abutter David B. Harris Michael Sendley, Esq. 600 Putnam Pike, St. 13 Greenville, RI 02828	mSENDLEY@cox.net ;	401-349-4405
Interested Persons (Electronic Service Only)		
Harrisville Fire District Richard Sinapi, Esq. Joshua Xavier, Esq. 2347 Post Road, Suite 201 Warwick, RI 02886	ras@sinapilaw.com ;	401-739-9690
	jdx@sinapilaw.com ;	
Residents of 945 Wallum Lake Road, Pascoag, RI (Walkers) Nicholas Gorham, Esq. P.O. Box 46 North Scituate, RI 02857	nickgorham@gorhamlaw.com ;	401-647-1400
	edaigle4@gmail.com ;	

Peter Nightingale, member Fossil Free Rhode Island 52 Nichols Road Kingston, RI 02881	divest@fossilfreeri.org ;	401-789-7649
Sister Mary Pendergast, RSM 99 Fillmore Street Pawtucket, RI 02860	mpendergast@mercyne.org ;	401-724-2237
Patricia J. Fontes, member Occupy Providence 57 Lawton Foster Road South Hopkinton, RI 02833	Patfontes167@gmail.com ;	401-516-7678
Burrillville Land Trust Marc Gertsacov, Esq. Law Offices of Ronald C. Markoff 144 Medway Street Providence, RI 02906	marc@ronmarkoff.com ;	401-272-9330
Paul Roselli, President Burrillville Land Trust PO Box 506 Harrisville, RI 02830	proseli@cox.net ;	401-447-1560
Rhode Island Progressive Democrats of America Andrew Aleman, Esq. 168 Elmgrove Avenue Providence, RI 02906	andrew@andrewaleman.com ;	401-429-6779
Fighting Against Natural Gas and Burrillville Against Spectra Expansion Jillian Dubois, Esq. The Law Office of Jillian Dubois 91 Friendship Street, 4 th Floor Providence, RI 02903	jillian.dubois.esq@gmail.com ;	401-274-4591
Burrillville Town Council c/o Louise Phaneuf, Town Clerk 105 Harrisville Main Street Harrisville, RI 02830	lphaneuf@burrillville.org ;	401-568-4300
Christine Langlois, Deputy Planner Town of Burrillville 144 Harrisville Main Street Harrisville, RI 02830	clanglois@burrillville.org ;	401-568-4300
Joseph Raymond, Building Official	jraymond@burrillville.org ;	
Michael C. Wood, Town Manager Town of Burrillville 105 Harrisville Main Street Harrisville, RI 02830	mcwood@burrillville.org ;	401-568-4300 ext. 115

Mr. Leo Wold, Esq. Department of Attorney General 150 South Main Street Providence, RI 02903	LWold@riag.ri.gov ;	401-274-4400
Public Utilities Commission Cynthia Wilson Frias, Esq., Dep. Chief of Legal Alan Nault, Rate Analyst	Cynthia.Wilsonfrias@puc.ri.gov ; Alan.nault@puc.ri.gov ;	401-941-4500
Division of Public Utilities and Carriers John J. Spirito, Esq., Chief of Legal Steve Scialabba, Chief Accountant Tom Kogut, Chief of Information	john.spirito@dpuc.ri.gov ; steve.scialabba@dpuc.ri.gov ; thomas.kogut@dpuc.ri.gov ;	401-941-4500
Matthew Jerzyk, Deputy Legal Counsel Office of the Speaker of the House State House, Room 302 Providence RI, 02903	mjerzyk@rilin.state.ri.us ;	401-222-2466
Hon. Cale Keable, Esq., Representative of Burrillville and Glocester	Cale.keable@gmail.com ;	401-222-2258
Nick Katkevich	nkatkevich@gmail.com ;	
Avory Brookins	abrookins@ripr.org ;	
Joseph Bucci, Acting Administrator Highway and Bridge Maintenance Operations RI Department of Transportation	joseph.bucci@dot.ri.gov ;	
Jared Rhodes, Chief Statewide Planning Program Jennifer Sternick Chief of Legal Services RI Department of Administration	jared.rhodes@doa.ri.gov ; Jennifer.sternick@doa.ri.gov ;	
Doug Gablinske, Executive Director TEC-RI	doug@tecri.org ;	
Tim Faulkner ecoRI News 111 Hope Street Providence, RI 02906	tim@ecori.org ;	401-330-6276
Sally Mendzela	salgalpal@hotmail.com ;	
Keep Burrillville Beautiful Paul LeFebvre	paul@acumenriskgroup.com ;	401-714-4493
Mark Baumer	everydayyeah@gmail.com ;	
Nisha Swinton Food & Water Watch New England	nswinton@fwwatch.org ;	
Kaitlin Kelliher	Kaitlin.kelliher@yahoo.com ;	
Joe Piconi, Jr.	jiggzy@hotmail.com ;	

Hon. Aaron Regunberg Representative of Providence, District 4	Aaron.regunberg@gmail.com ;	
Paul Ernest	paulwernest@gmail.com ;	
Skip Carlson	scarlson@metrocast.net ;	
Kathryn Scaramella	kscaramella@outlook.com ;	
Diana Razzano	Dlrazzano13@verizon.net ;	
David Goldstein	tmdgroup@yahoo.com ;	
Douglas Jobling	djobling@cox.net ;	
Claudia Gorman	corkyhg@gmail.com ;	
Curt Nordgaard	Curt.nordgaard@gmail.com ;	
Colleen Joubert	Colleenj1@cox.net ;	
Matt Smith Food & Water Watch	msmith@fwwatch.org ;	
Christina Hoefsmit, Esq. Senior Legal Counsel RI Department of Environmental Management	Christina.hoefsmit@dem.ri.gov ;	
Steven Ahlquist, RIFuture	atomicsteve@gmail.com ;	
Pascoag Utility District William Bernstein, Esq. Michael Kirkwood, General Manager Robert Ferrari, Northeast Water Solutions, Inc.	mkirkwood@pud-ri.org ;	
	Wlblaw7@gmail.com ;	
	rferrari@nwsinc.net ;	
Ben Weilerstein Toxics Action Center	ben@toxicsaction.org ;	
Russ Olivo Woonsocket Call	rolivo232@gmail.com ;	
Suzanne Enser	svetromile@gmail.com ;	
Rhode Island Student Climate Coalition	riscc@brown.edu ;	
Tom Kravitz	tkravitz@nsmithfieldri.org ;	
Barry Craig	barrygcraig1@gmail.com ;	