

May 25, 2017

Via Electronic Mail and Federal Express Delivery

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

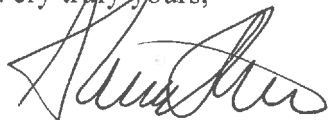
Re: Invenergy Thermal Development LLC's Application to Construct and Operate the Clear
River Energy Center in Burrillville, Rhode Island
Docket No.: SB-2015-16

Dear Mr. Bianco:

On behalf of Clear River Energy LLC and the Clear River Energy Center Project ("Invenergy"), enclosed please find an original and three (3) copies of Invenergy's First Set of Data Requests on the Town of Burrillville and the Conservation Law Foundation.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER
ashoer@apslaw.com

Enclosures

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 ENERGY CENTER IN
BURRILLVILLE, RHODE ISLAND

SB-2015-06

**CLEAR RIVER ENERGY LLC'S (INVENERGY'S) 1st SET OF DATA
REQUESTS TO THE CONSERVATION LAW FOUNDATION**

- INVENERGY REQUEST 1-1:** With regard to (a) each of the expert witnesses previously disclosed by the Conservation Law Foundation (CLF) to the Energy Facility Siting Board (EFSB); (b) any additional expert witnesses that have been identified since CLF's original expert disclosure, and (c) any additional expert witnesses CLF believes it may call at the final hearings in this matter, please provide separately for each witness the following:
1. Describe in detail the subject matter upon which each expert is expected to testify;
 2. State in detail the substance of the facts and opinions in which each expert is expected to testify;
 3. State in detail the grounds for each opinion to which each expert is expected to testify; and
 4. State whether any expert witness disclosed or identified by Clf performed any of the following activities at the Clear River Energy Center (CREC) site that is the subject of the current proceeding and, if the answer to any of the following is in the affirmative, provide the results thereof:
 - a. A complete site-specific biodiversity inventory of the CREC site and the CREC right of way;
 - b. Auditory and visual point count surveys at established stations, including estimate of distance from station;
 - c. Nocturnal playback survey, including recording all owl calls heard;
 - d. Deploy remote field cameras at targeted locations within the project area, including along stream

- corridors, game trails, stone walls, and other features which may attract mammals;
- e. Small mammal trapping study using Sherman live traps, with morphological data to be recorded for all captured individuals;
 - f. Breeding amphibian call surveys to be conducted from stations within project area, including recording of species and number of individuals;
 - g. Establish pit-fall trap arrays;
 - h. Walk evenly-spaced transects through the project area and visually search for reptile species. Survey to include searching under fallen logs, leaf litter, and other habitat features encountered along transects;
 - i. Transect survey through project area. Observer to capture odonates, butterflies, and beetles using insect net. Observer to identify bee species observed along transects;
 - j. Nocturnal moth survey using light trap;
 - k. Kick net survey to be completed in Dry Arm Brook and intermittent tributary to Iron Mine Brook following the RIDEM Rapid Bioassessment Protocol; and
 - l. Plots established within project area. Each plot divided into numbered 1-meter quadrat grid. Random numbers table to be used to select quadrats. All plant species within selected quadrats identified and stems counted. Estimated height recorded for trees and shrubs, and dbh also recorded for trees.

Presented by
CLEAR RIVER ENERGY LLC
By its Attorneys,

/s/Alan M. Shoer

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Dated: May 25, 2017

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2017, I delivered a true copy of the foregoing Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer