

March 20, 2017

Via Federal Express/Electronic Mail

Todd Anthony Bianco, EFSB Coordinator
RI Energy Facilities Siting Board
89 Jefferson Blvd.
Warwick, RI 02888

Re: *Invenergy Docket No. SB-2015-06*

Dear Mr. Bianco:

On behalf of Invenergy Thermal Development LLC (“Invenergy”), enclosed please find an original and ten (10) copies of Invenergy’s Response to the Town of Burrillville’s 25th Set of Data Requests.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER
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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

DOCKET No. SB-2015-06

**INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO
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25-1 Please state whether Invenergy is planning to implement a reporting procedure to track the number of trucks to and from the facility that includes the daily/weekly/monthly maximum number of trucks. If not, please explain.

RESPONSE 25-1 Standard plant operating procedures include maintaining a log of all the deliveries to the Clear River Energy Center ("CREC" or "Project" or "Facility") once it is operational. This log could be used to report on the number of deliveries, if the Project is required to do so.

RESPONDENT: John Niland, Invenergy Thermal Development
 Amit Nadkarni, Invenergy Thermal Development

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25-2 In the Revised Water Supply Plan, (page 4) 2.2.1 paragraphs 5 and 6, please clarify where the general housekeeping, floor/equipment drains, and general maintenance water discharges. Please clarify the location of the discharge.

RESPONSE 25-2 Please refer to the water balance provided in Appendix C of the revised Water Supply Plan, filed with the Energy Facility Siting Board ("the Board") on January 11, 2017. The general housekeeping, floor/equipment drains and general maintenance water is depicted as Misc. Plant Services and discharges to the Oil Water Separator as shown on the water balance documents. After oil is extracted, water is sent to a Waste Water Collection Tank before being treated and recycled into the system or trucked offsite.

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25-3

Please clarify the following regarding the demineralization trailers:

- a. Is there redundancy in the demineralization trailers to handle an oil fired event? Appendix C, Sheet 4 appears to show an additional Mobile Ion-Exchange Demineralization Trailer in use during an oil burning event. Please clarify the number of demineralization trailers on site.
- b. The equipment cut sheets shown in Appendix B, the demineralization trailer, require a minimum flow rate of 50 GPM. However, the flowrates in Appendix C Water Balance Diagrams show flows through the demineralization trailers below this rate. Please advise if the design intent is to run at this low flowrate or to run as a batch process at the higher required GPM for a shorter amount of time.
- c. Please advise if there is a reason as to why regenerating on site is not being considered (e.g. to avoid trucking regen liquid).

RESPONSE 25-3

- a. There is no requirement for redundancy for the demineralization trailer for the oil fired event. When using oil, the throughput of water increases and what is shown on the diagram is that there is a spare connection for an additional trailer that can be hooked up to allow a seamless transfer from one trailer to the next.

There will be one demineralized trailer at a time at the Facility, including the oil fired event.

The site plan has a space allocation for two demineralized trailers for ease of switching out the trailers.

- b. There is a minimum flow required to be processed through the trailer. The Facility will operate the demineralization trailer as a batch process.
- c. Regeneration on site is not possible. The regeneration process is a special treatment process and is proprietary to the supplier. Regenerating the trailers onsite, if it could be accomplished, would increase water demand and negate the key purpose of using

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the mobile demineralization trailers. The regeneration process would also involve a back wash cycle, which would increase the waste water discharged from the Facility. Utilizing the mobile demineralization trailers minimizes the total number of water and waste water trucks that need to travel to and from the site.

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25-4

Please clarify the following about the evaporative cooling process.

- a. Please provide the anticipated conditions (dry bulb temperature, wet bulb temperature, and/or relative humidity) at which evaporative cooling will be used.
- b. Figure 2.3 Water Source Capacity (page 13) in the Revised Water Supply Plan evaluated the "use to supply" capability assuming 8 hours per day and presents that this water source is more than adequate, but also that the use of the evaporator use is discretionary. Please provide the anticipated annual number of hours in evaporative cooling.
- c. If the make-up water for the evaporative cooling flow requires the maximum flow of 4,600 GPH for 8 hours per day, that would increase the truck traffic by 4.6 trucks per day. Please clarify if this is correct or provide the anticipated duration and increase in daily truck traffic related to replenishing over time (similar to Table 2.5).
- d. The conceptual flow models shown in Appendix C do not include any cases where the evaporative cooling is shown. The evaporative cooling is only mentioned in a note. Please include a revised mass balance diagram showing the case where the evaporative cooling is at a maximum, 4,600 GPH.

RESPONSE 25-4

- a. Evaporative Cooling ("EC") increases the plant efficiency to produce incremental power. The effectiveness of the evaporative cooling function depends on the difference between ambient temperature (dry bulb temperature) and relative humidity or wet bulb temperature, and the consumption rates vary based on the difference between these two temperatures (wet bulb and dry bulb). When the ambient temperature is high (high dry bulb temperature) and the humidity is high (high wet bulb temperature), the effectiveness of the EC is low, and its use would not consume as much water as compared to when it is hot and dry. In Rhode Island, normally hot days are accompanied by high humidity (i.e. high wet bulb temperatures), and the EC is not as effective. However, those are the conditions that create higher demand on the electrical system. Invenergy expects that it would

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only use EC when the demand for energy is high; for example, when the ambient temperature is above 80F.

The decision to operate the evaporative coolers is at the discretion of the Facility and this function is not required for normal plant operation. The decision on when to operate EC is a function of the effectiveness of the EC due to variable ambient weather conditions and the coincident demand on the electrical system.

A review of the historical weather data in Providence indicates that temperatures above 80F, when it is more likely to operate evaporative cooling, occur approximately 400 hours a year.

As stated in the response to data set 22, response 31, Invenergy expects to run the evaporative coolers for 4-6 hours per day, and it would be used only during the summer months (part of June-part of September).

- b. Figure 2.3 Water Source Capacity (page 13) in the Revised Water Supply Plan was merely comparing a conservatively high estimate of CREC water use (i.e. 8 hours a day of evaporative cooling) against the capacity of the Providence Water Supply system. As mentioned above, there is a potential to operate the evaporative coolers for approximately 400 hours per year based on historical weather data. However, as stated in the response to data set 22, response 31, Invenergy expects to run the evaporative coolers when the circumstances warrant such usage, and, if so, for about 4-6 hours per day only during the summer months (part of June through part of September).
- c. The 4600 GPH is a maximum expected demand based on evaporative cooling when the ambient conditions are 90F/45% RH. Based on our review of historical ambient conditions, there are very few hours in a year that would see those high temperatures (above 90F). However, Invenergy does anticipate that there will be periods of time when consistent high temperatures occur over several days. Under these circumstances, CREC EC water needs can be met by up to 3 additional trucks per day maximum, for those times when consistent high temperatures

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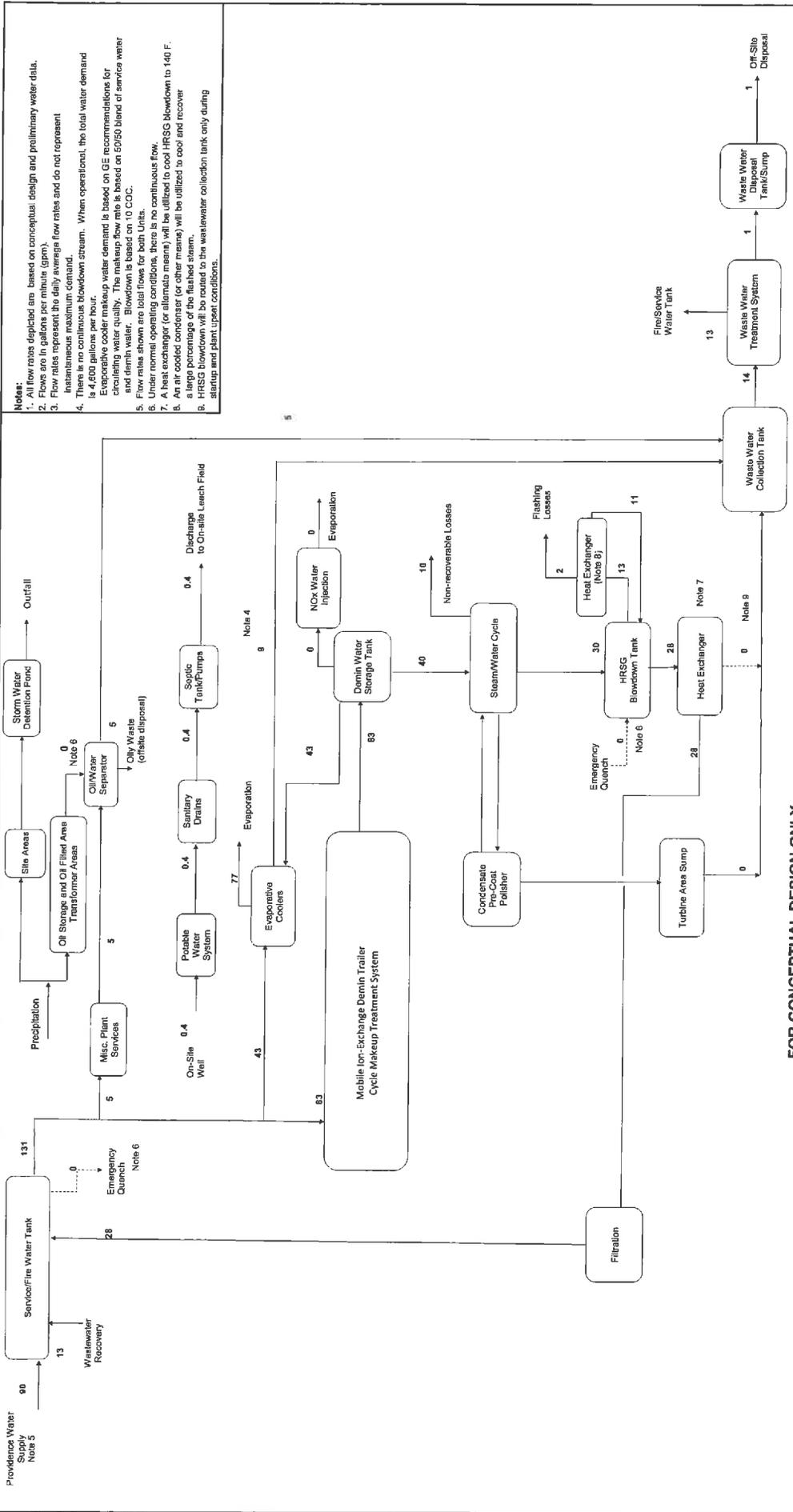
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warrant extended EC operation over the course of the summer months.

d. See attachment.

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- Notes:**
- All flow rates depicted are based on conceptual design and preliminary water data.
 - Flows are in gallons per minute (gpm).
 - Flow rates represent the daily average flow rate and do not represent instantaneous maximum demand.
 - There is no continuous blowdown stream. When operational, the total water demand for makeup water is based on OE recommendations for circulating water quality. The makeup flow is based on 50/50 blend of service water and demin water. Blowdown is based on 10 C/C.
 - Flow rates shown are total flows for both Units.
 - Under normal operating conditions, there is no continuous flow.
 - A heat exchanger (or alternate means) will be utilized to cool HRSG Blowdown to 140 F.
 - An air-cooled condenser (or other means) will be utilized to cool and recover a large percentage of the flashed steam.
 - HRSG blowdown will be routed to the wastewater collection tank only during startup and plant upset conditions.

FOR CONCEPTUAL DESIGN ONLY

	Conceptual Design Basis Demin Water Makeup Demand: 1.0% of IP/HP Steam Flow Possible Water Demand: 20 gpm/cool, 40 gal per day, 3 shifts Ambient Conditions: 90°F / 45%RH / Fined Evap Cooler ON Fuel Oil Injection: None	Invenergy	RHODE ISLAND TWO 1 x 1 COMBINED CYCLE NATURAL GAS FIRED WATER MASS BALANCE Two 1 X 1 GE 7HA.02 - Dry Cooling Summer Ambient Conditions - Full Load	Project: 238926	Drawing: WMB-01 SHEET 2-4
	3/17/2017 GE 7HA Class 3 (Revised 3/17/2016)			238926	238926

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25-5 Please confirm that the design conditions stated in Appendix C are the worst case scenarios (e.g. Is the evaporative cooling designed for the ASHRAE maximum temperature?)

RESPONSE 25-5 The conditions included in the water balances represent the maximum expected cases that the Facility should be designed for. Although there could be hotter or colder days, the expected durations of those days are short and are not used for design purposes. The basis of the conditions used in the water balances are as follows:

Drawing WMB-01 in Appendix C of the revised Water Supply Plan represents an average ambient condition based on data from ASHRAE.

Drawing WMB-02 represents a summer ambient condition. This data point was chosen based on ISO-NE requirement for demonstrating the summer Claimed Capability which shall be based on a 90 degree Fahrenheit day.

WMB-03 represents a winter ambient condition firing on natural gas, and drawing WMB-04 represents a winter ambient condition firing on fuel oil. This case is a worst case from a water consumption stand point. This data point was chosen based on ISO-NE requirement for demonstrating the winter Claimed Capability which shall be based on a 20 degree Fahrenheit day.

RESPONDENT: John Niland, Invenergy Thermal Development LLC
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INVENERGY THERMAL DEVELOPMENT LLC
By its Attorneys,

/s/ Alan M. Shoer

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Dated: March 20, 2017

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2017, I delivered a true copy of the foregoing responses to the Town of Burrillville's 25th Set of Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

SB-2015-06 Invenergy CREC Service List as of 03/08/2017

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