### STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

IN RE: Application of Invenergy Thermal Docket No. SB-2015-06

Development LLC's Proposal for Clear River Energy Center

### INVENERGY THERMAL DEVELOPMENT LLC's RESPONSES TO THE TOWN OF BURRILLVILLE'S 30th SET OF DATA REQUESTS

Request 30-1

On June 29, 2017, Enbridge (formerly Spectra) submitted a letter to FERC withdrawing Algonquin's Access Northeast ("ANE") Project from Pre-Filing Review. (See letter attached as Exhibit A.).

According to FERC filings, if the ANE Project had been built in 2018 as originally proposed, it would have been capable of providing up to 925 million cubic feet per day of natural gas at various delivery points on the existing Algonquin pipeline system. The ANE Project also included an LNG storage facility in Acushnet, MA connected to the pipeline with the capacity to store 84.6 million gallons of natural gas

- a. Describe in detail how the withdrawal of Algonquin's ANE Project will affect the proposed Clear River Energy Center project in Burrillville, including, but not limited to, how this change affects Invenergy's previously submitted application materials, data responses, and written testimony.
- b. Describe in detail how delivery and storage capacity from the proposed ANE Project were taken into account in calculations related to the CREC Project, including, but not limited to, Invenergy's previously submitted application materials, data responses, and written testimony.
- c. Describe in detail how the withdrawal of the proposed ANE Project would affect the number of estimated days annually that Clear River Energy Center would need to burn oil.
- d. Describe in detail any problems Invenergy anticipates in obtaining sufficient natural gas in light of the withdrawal of the proposed ANE Project.

Response 30-1 (a-d):

The withdrawal of Algonquin's ANE Project is not anticipated to affect the Clear River Energy Center ("CREC") Project in any significant way. Invenergy Thermal Development LLC ("Invenergy") was not relying on the ANE project in any way for its gas supply for purposes of this application.

As outlined in our response to the Rhode Island Division of Public Utilities and Carriers, Docket 4609, Data Request, No. 3-3 last year, CREC has a Memorandum of Understanding with Algonquin Pipeline that sets the firm commitment for Algonquin to provide the lateral and firm transportation ("FT") services as needed. The supply options for CREC are:

#### STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

IN RE: Application of Invenergy Thermal

Development LLC's Proposal for Clear River Energy Center Docket No. SB-2015-06

## INVENERGY THERMAL DEVELOPMENT LLC's RESPONSES TO THE TOWN OF BURRILLVILLE'S 30th SET OF DATA REQUESTS

- 1. Supply and transportation contract with a supplier who holds transportation capacity on Algonquin; or
- 2. A Firm transportation contract with Algonquin combined with a supply contract from a producer who can then use our transportation.

Invenergy has identified and had discussions with several entities who currently have available firm transportation on the Algonquin system that will be available by the time the CREC unit comes on line. Some of these entities hold capacity that is being built under the AIM and Atlantic Bridge ("AB") expansions that Algonquin is currently constructing. These two projects will add 474,000 Dth/D of new capacity by November of 2017. Additionally, Invenergy has the above mentioned MOU with Algonquin which provides Algonquin's commitment to provide 75,000 Dth/D of firm capacity, which is sufficient for one unit full time. Invenergy has had discussions with several capacity holders, and based on these discussions there is ample available capacity that should allow CREC to obtain service for at least several years and experience a real time daily and annual dispatch/load profile and then CREC will be able to match its final long term fuel supply and transportation contracting strategy to the Project's actual daily and annual run profile and have that reflected in the necessary form of agreement for supply.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: July 13, 2017

# INVENERGY THERMAL DEVELOPMENT LLC By its Attorneys,

/s/ Alan M. Shoer

Alan M. Shoer, Esq. (#3248) Richard R. Beretta, Jr. Esq. (#4313) Nicole M. Verdi, Esq. (#9370) ADLER POLLOCK & SHEEHAN, P.C. One Citizens Plaza, 8<sup>th</sup> Floor

Providence, RI 02903-1345 Tel: 401-274-7200

Fax: 401-351-0607 Dated: July 13, 2017

#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2017, I delivered a true copy of the foregoing responses to the Town of Burrillville's 30<sup>th</sup> Set of Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer