

August 9, 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 and the Clear River Energy Center Project (“Invenergy”), enclosed please find an original and three (3) copies of Invenergy’s Responses to the Town of Burrillville’s 32nd Set of Data Requests.

Please let me know if you have any questions.

Very truly yours,

  
ALAN M. SHOER  
[ashoer@apslaw.com](mailto:ashoer@apslaw.com)

Enclosures

cc: Service List

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 32<sup>nd</sup> SET OF DATA REQUESTS**

Request 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.

Response 32-1(a) The annual property taxes that PA Consulting Group ("PA") used in its economic analysis for the Clear River Energy Center ("CREC" or "Facility" or "Project") were based on the property taxes from the PILOT agreement between Invenergy Thermal Development LLC ("Invenergy") and the Town of Burrillville and included additional taxes that would be paid to the Pascoag Fire District.

Response 32-1(b) The capacity factor assumptions are an output of PA modeling of the ISO-NE market. PA projects market prices for the RI zone and dispatches the CREC based on operating characteristics provided by Invenergy. PA's modeling methodology is described in more detail within PA's June 16, 2015 Memorandum filed with the Rhode Island Energy Facility Siting Board ("EFSB" or "Board") on November 9, 2015. The market prices and key assumptions underlying the analysis were previously sent to the Town, in Invenergy's Supplemental Response to the Office of Energy Resources' Data Request, No. 3-1, Exhibit A.

RESPONDENT: Ryan Hardy, PA Consulting Group

John Niland, Invenergy Thermal Development LLC

DATE: August 9, 2017

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Request 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.

Response 32-2(a) The BTMPV assumptions are based on ISO-NE's projections from the 2017 CELT Report, which are adjusted based on PA's internal view of BTMPV growth in ISO-NE. This is the same methodology use in PA's previous analyses of CREC.

32-2(b) PA's supply assumptions are based on a combination of public and proprietary data for new capacity additions and retirements. For the prompt 3 years, PA relies on the cleared FCA results to determine the changes to supply, and from 2021 on, PA relies on research as well as model iterations to determine market entry and exit. PA's assumed changes in supply from 2017 to 2025 were included in Invenergy's Supplemental Response to the Office of Energy Resources' Data Request, No. 3-1, Exhibit A.

32-2(c) N/A

RESPONDENT: Ryan Hardy, PA Consulting Group

DATE: August 9, 2017

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Request 32-3            Are the assumptions for BTMPV consistent with the 2017 report? Please  
explain.

Response 32-3            Please see answer to Data Request, No. 32-2(c).

RESPONDENT:            Ryan Hardy, PA Consulting Group

DATE:                      August 9, 2017

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Request 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.

Response 32-4(a) PA does not assume new transmission is built from Canada to satisfy ISO-NE load.

32-4(b) PA incorporates the Block Island Offshore Wind project, a 30 MW offshore wind project that is interconnected to the RI zone of ISO-NE. PA does not assume additional offshore wind enters the ISO-NE market as it is prohibitively expensive as compared to other supply options, including both thermal and other renewable.

32-4(c) N/A

32-4(d) Within PA's production cost model, PA assumes a zero variable cost for offshore wind. However, this does not factor in capital costs associated with such plants nor the costs of building underwater transmission lines, which are substantial.

RESPONDENT: Ryan Hardy, PA Consulting Group

DATE: August 9, 2017

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THE TOWN OF BURRILLVILLE'S 32<sup>nd</sup> SET OF DATA REQUESTS**

Request 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?

Response 32-5       Invenergy Thermal Development LLC was the original sponsor and Invenergy Energy Management LLC is the registered Lead Market Participant responsible for the CSO associated with the Project.

RESPONDENT:       John Niland, Invenergy Thermal Development LLC

DATE:               August 9, 2017

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THE TOWN OF BURRILLVILLE'S 32<sup>nd</sup> SET OF DATA REQUESTS**

Request 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.

Response 32-6        Invenergy Thermal Development LLC and Invenergy Energy Management LLC  
are registered in Delaware, MD.

RESPONDENT:        John Niland, Invenergy Thermal Development LLC

DATE:                 August 9, 2017

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Request 32-7            With regard to the entity referred to in 32-5, did the same legal entity participate  
in FCA-11?

Response 32-7        Yes.

RESPONDENT:        John Niland, Invenergy Thermal Development LLC

DATE:                August 9, 2017

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Request 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.

Response 32-8 N/A

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: August 9, 2017

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Request 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.

Response 32-9 Invenergy has not made any attempts to secure alternative water sources as a result of the litigation. As indicated in our response to the Town's Data Request No. 22-57, Invenergy continues to engage in sound, responsible business practices through the exploration of additional contingent water sources to supplement the contingency contained in our previously filed water supply plan.<sup>1</sup>

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: August 9, 2017

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<sup>1</sup> The Town's Data Request, No. 22-57, states: "Is Johnston your one exclusive primary water source or are you still considering any other water sources?" In response to the Town's Data Request, No. 22-57, Invenergy stated: "Johnston is Invenergy's primary supplier. Invenergy has identified a contingent/redundant source, Benn Water & Heavy Transport Corp. Invenergy is still considering additional contingent/redundant sources."

INVENERGY THERMAL DEVELOPMENT  
LLC  
By its Attorneys,

/s/ Alan M. Shoer

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Tel: 401-274-7200  
Fax: 401-351-0604  
Dated: August 9, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 2017, I delivered a true copy of the foregoing responses to the Town of Burrillville's 32<sup>nd</sup> 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 07/11/2017**

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