

April 17, 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*

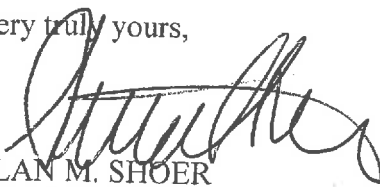
Dear Mr. Bianco:

On behalf of Invenergy Thermal Development LLC (“Invenergy”), enclosed please find:

- (1) an original and ten (10) copies of Invenergy’s Response to the Department of Administration, Division of Planning’s March 21, 2017 and March 29, 2017 Data Requests;
- (2) an original and ten (10) copies of Edinaldo Tebaldi and PA Consulting Group, Inc.’s April 14, 2017 Memorandum (attachment to the Data Responses above);
- (3) an original and one (1) copy of PA Consulting Group’s revised and confidential “Clear River Economic Impact Analysis Inputs and Results” file (attachment to the Data Responses above); and
- (4) Invenergy’s Motion for Protective Treatment.

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

DOCKET No. SB-2015-06

**INVENERGY THERMAL DEVELOPMENT
LLC'S RESPONSES TO THE DEPARTMENT OF ADMINISTRATION,
DIVISION OF PLANNING'S MARCH 21st AND MARCH 29th, 2017 DATA REQUESTS**

March 21, 2017
Request No. 1:

An update to the data that was previously requested on April 20, 2016. This update should:

- a. Account for any changes to the CREC project that are not reflected in that data, such as changes to the CREC project size, construction/operation phase timelines, generation capacity, or water plan.
- b. Include all of the inputs that were used in the input-output modeling described in section 5 of the application for both the IMPLAN and the JEDI models.

Response:

Updated JEDI and IMPLAN economic impact analysis assumptions employed by Edinaldo Tebaldi and PA Consulting Group, Inc. ("PA") are enclosed in the attached confidential spreadsheet titled: "Clear River Economic Impact Analysis Inputs and Results" and in the attached Memorandum dated April 14, 2017. The updates and changes can be summarized as follows:

- a. There have been some adjustments and increases in the revised anticipated Clear River Energy Center ("CREC" or "the Project") construction costs as compared to the values previously provided. These increased costs are attributed to several factors, including but not limited to the shift in Project scheduling by about one year due to delays in permitting and to reflect the anticipated two-stage construction schedule. There are also increased costs associated with the Project's electrical interconnect with National Grid, additional labor costs, bid estimates and firm quotes for equipment and construction to account for the two-stage construction process.
- b. The revised Water Supply Plan, filed with the Board on January 11, 2017, results in a required adjustment on the Project's capital and operating costs due to:
 - i. The replacement of the Project's original design for a permanent on site water treatment system with the revised Water Supply Plan utilizing rental demineralized water treatment trailers. This change

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in design is expected to reduce capital costs by approximately \$2 million.

- ii. The replacement of the original design utilizing a Pascoag Utility District (“PUD”) water supply well, its carbon filter treatment system and associated pipeline with a supply system utilizing trucked water from the Town of Johnston. This reduced the initial capital costs due to the elimination of the water pipeline and the PUD well treatment system and added a truck facility and long-term agreement with the Town of Johnston. The associated costs for the new water plan will include a new truck filling facility in that Town of Johnston and its associated benefits package, as outlined in the agreement that Invenergy Thermal Development LLC has with the Town of Johnston. The net effect of this change was a reduction in up-front capital costs of \$2 million. This change will increase annual water costs and reduce original annual catalyst, piping and chemicals costs.
 - iii. The elimination of the waste water force main and replacement with a storage tank and added recycle filter system. The net effect of this change was a reduction in up-front capital costs of \$1 million for a total reduction of \$5 million dollars (when combined with capital cost reductions from items i and ii).
- c. There have been no changes to the CREC project size or generation capacity.
 - d. The above items have been included in the attached revised (confidential) Clear River Economic Impact Analysis Inputs and Results file.

Respondent: John Niland, Invenergy Thermal Development LLC
Ryan Hardy, PA Consulting Group, Inc.

Date: April 17, 2017

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March 21, 2017 An update to the project cost data.
Request No. 2:

This update should include:

- a. The project costs by category; and
- b. The share of each of these cost categories that will go to in-state vs. out-of-state firms.

Response: Please see the attached (confidential) file detailing all CREC economic impact analysis assumptions employed by Edinaldo Tebaldi and PA Consulting in the attached confidential spreadsheet titled: "Clear River Economic Impact Analysis Inputs and Results." All construction and operating costs as well as in-state Rhode Island share percentages have been updated where appropriate to reflect the new construction timeline and the changes discussed in the response to Request No. 1. Assumptions that have been changed are highlighted in the attached confidential spreadsheet titled: "Clear River Economic Impact Analysis Inputs and Results" with notes added where appropriate.

The inputs shown on the Energy Market Cost Savings tab in the confidential spreadsheet titled: "Clear River Economic Impact Analysis Inputs and Results" reflect PA's June 2016 projection of the energy and capacity market savings of \$210 million to Rhode Island ratepayers as a result of CREC, with the four-year totals (2019-2022) from that analysis applied to the first four years of commercial operations and as described in the Public Utilities Docket 4609.

It is important to note that these projections of energy and capacity market saving will be updated. The projections shown were completed after FCA 10 (when only one of two units cleared), and thus do reflect a two-stage construction process, but they do not reflect the current Project schedule and market assumptions following FCA 11. PA will be updating its analysis by the end of June utilizing market assumptions from the ISO-NE's 2017 CELT Report, which is scheduled to be released by May 1, 2017. The CELT load forecast is a primary input within PA's modeling and could have material impact on the forecasted market outlook used to calculate capacity pricing, energy pricing and emissions savings. Once PA has updated its projection of energy and capacity market savings to Rhode Island ratepayers, the economic impact analysis will be updated accordingly.

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March 21, 2017 Request No. 3: Advise as to whether the updated information takes into account the fact that the project is split from one-stage to two-stage construction.

Response: As noted in the previous response, PA's updated economic impact analysis takes into account the construction and operating phase assumptions consistent with the latest two-stage construction schedule, with a revised commercial on-line date of June 1, 2020.

Also, as explained in the previous response, the energy market cost savings four-year total of \$210 million also reflects a two-stage construction process (post-FCA 10), but have not yet been updated to reflect the current Project schedule and market assumptions following FCA 11. PA will be updating that analysis to account for the subsequent delay since those results were completed and the fact that the second unit did not clear in FCA 11.

As noted, PA will be updating its analysis of energy and capacity market savings utilizing market assumptions from the ISO-NE's 2017 CELT Report, scheduled to be released in the first week of May 2017. Once PA has updated its projection of energy and capacity market savings to the RI ratepayer, PA will provide an updated analysis of the economic impact of those cost savings on the Rhode Island economy. Once the 2017 CELT is released, the time required to update the energy and capacity cost savings is approximately four to five weeks, so PA expects to have an updated economic impacts analysis accounting for the updated energy and capacity cost savings by the end of June 2017.

Respondent: John Niland, Invenergy Thermal Development LLC
Ryan Hardy, PA Consulting Group, Inc.

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March 29, 2017
Request No. 1:

An update to the data and analysis provided in Sections 4.0 and 5.0 of Invenergy's Filing and Supplemental filing, including the economic and employment analysis.

This update should:

- a. Reflect the new project plan;
- b. Include calculations of Rhode Island employment, earnings, and economic output effects;
- c. Include an update to the information provided by PA Consulting Group, Inc. in its November 4, 2015 Memorandum that separates the direct and indirect Rhode Island employment and earnings impacts; and
- d. Note any changes to the underlying assumptions or methodology of the analysis that were used to account for changes to the CREC project.

Response:

Edinaldo Tebaldi and PA have provided an updated version of the November 4, 2015 memorandum. The enclosed memorandum, dated April 14, 2017, reflects Rhode Island employment and earnings projections consistent with the current CREC construction schedule as well as the latest construction and operating cost assumptions. The latest input assumptions and commentary on changes since the 2016 analysis can be found in the enclosed confidential Clear River Economic Impact Analysis Inputs and Results file. The same file also includes a summary of projected Rhode Island employment, earnings and economic output resulting from the construction, operation and energy and capacity market cost savings to Rhode Island ratepayers resulting from CREC.

As noted in previous responses, PA will be updating its analysis of energy and capacity market savings utilizing market assumptions from the ISO-NE's 2017 CELT Report, scheduled to be released in the first week of May 2017. Once PA has updated its projection of energy and capacity market savings to the RI ratepayer, it will provide an updated analysis of the economic impact of those cost savings on the RI economy.

Respondent:

John Niland, Invenergy Thermal Development LLC
Edinaldo Tebaldi
Ryan Hardy, PA Consulting Group, Inc.

Date:

April 17, 2017

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INVENERGY THERMAL DEVELOPMENT LLC
By its Attorneys,

/s/ Alan M. Shoer

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Dated: April 17, 2017

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2017, I delivered a true copy of the foregoing responses to the Energy Facilities Siting Board via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

SB-2015-06 Invenergy CREC Service List as of 04/17/2017

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