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August 31, 2017

Todd A. Bianco
Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Re: Invenergy Thermal Development LLC – Clear River Energy Center
Docket No. SB-2015-06

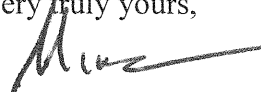
Dear Dr. Bianco:

Enclosed for filing in this matter are an original and three (3) copies of the Town of Burrillville's Reply to Invenergy Thermal Development LLC's Objection to the Town's Motion to Dismiss the Invenergy Application Due to Invenergy's Failure to Furnish Complete Plans as to All Structures, as required by the Energy Facility Siting Act and the Board's Rules. Electronic copies have been sent to the service list.

The Town has respectfully requested oral argument on this Motion.

If you need any further information, please do not hesitate to contact me.

Very truly yours,



Michael R. McElroy

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 : DOCKET No. SB-2015-06
ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND :

**THE TOWN OF BURRILLVILLE'S REPLY TO INVENERGY THERMAL
DEVELOPMENT LLC'S OBJECTION TO THE TOWN'S MOTION TO DISMISS
THE INVENERGY APPLICATION DUE TO INVENERGY'S FAILURE TO
FURNISH COMPLETE PLANS AS TO ALL STRUCTURES**

The Town of Burrillville ("Town") hereby submits its Reply to Invenergy Thermal Development LLC's ("Invenergy") Objection to the Town's Motion to Dismiss the Invenergy Application due to Invenergy's Failure to Furnish Complete Plans as to All Structures as required by the Energy Facility Siting Act ("EFSA") and the Energy Facility Siting Board's ("EFSB") Rules of Practice and Procedure ("EFSB Rules"). R.I.G.L. § 42-98-8(a)(2); EFSB Rule 1.6(b)(8).

The Town has asked the EFSB to dismiss Invenergy's licensing proceeding with prejudice because:

- (1) the jurisdiction of the EFSB is expressly based on the mandatory filing by Invenergy of "complete plans as to all structures ... associated with the proposed facility" in its pre-licensing application in accordance with R.I.G.L. § 42-98-8(a)(2) and EFSB Rule 1.6(b)(8);¹

¹ The phrase "complete plans" is not defined within the EFSA (or the EFSB Rules). It is well settled in Rhode Island that when the language of a statute is clear and unambiguous, the statute must be interpreted literally and must give the words of the statute their plain and ordinary meanings. *Wigginton v. Centracchio*, 787 A.2d 1151, 1154 (R.I. 2001) (quoting *Providence & Worcester Railroad Co. v. Pine*, 729 A.2d 202, 208 (R.I.1999)). "This is particularly true where the Legislature has not defined or qualified the words used within the statute." *Ryan v. City of Providence*, 11 A.3d 68, 71 (R.I. 2011) (quoting *Markham v. Allstate Insurance Co.*, 352 A.2d 651, 654 (R.I. 1976)). The Rhode Island Supreme Court often looks to dictionary definitions to interpret statutes, especially where the General Assembly has not defined the word used within the statute itself. "In carrying out the process of determining the meaning of the words employed by an enacting legislature, reference to contemporaneous dictionaries is appropriate and often helpful." *Chambers v. Ormiston*, 935 A.2d 956, 962 (R.I. 2007).

- (2) Invenenergy has failed to provide complete plans as to all structures associated with the proposed facility;
- (3) the complete plans “shall be the basis for determining jurisdiction.” R.I.G.L. § 42-98-8(a)(2);
- (4) jurisdictional requirements cannot be waived by the EFSB or the parties; and
- (5) under R.I.G.L. § 42-98-16(a), failure to comply with an EFSB rule, regulation, requirement or procedure for licensing constitutes grounds for dismissal.

I. ARGUMENT

- A. *Invenenergy must provide both a “detailed description of the facility” and “complete plans as to all structures” in its pre-licensing application.*

Under the EFSA and the EFSB Rules, a pre-licensing applicant before the EFSB must submit **both** a “detailed description of the proposed facility, including its function and operating characteristics, **and** complete plans as to all structures.” R.I.G.L. § 42-98-8(a)(2); EFSB Rule 1.6(b)(8) (emphasis added).

In its Objection, Invenenergy attempts to confuse the issue before the EFSB. Invenenergy argues that because it has provided some “detailed” information to the EFSB and the Town, it should somehow be exempt from the requirement to provide “complete plans.”² However, Invenenergy is not given the choice to provide one or the other. Invenenergy must provide both.

² Invenenergy places a great focus in its Objection on the alleged “details” it has provided to the EFSB and the Town. In fact, the term “detail” appears in Invenenergy’s Objection fifty-nine (59) times in various forms.

These basic requirements should come as no surprise to Invenergy, which has built 105 energy projects worldwide, totaling over 15,900 megawatts (MW), including 10 natural gas fired plants totaling 5,519 MW.³

The issue which forms the basis for the Town's Motion to Dismiss is that Invenergy has not provided "complete plans as to all structures" in its pre-licensing application.⁴ The issue before the EFSB is not whether Invenergy has provided some "detailed" information.⁵ Even if the EFSB finds that Invenergy has provided a "detailed description of the proposed facility" as Invenergy alleges in its objection, this does not meet the requirements of the EFSA and the EFSB Rules. Invenergy must provide both a "detailed description" **and** "complete plans." It has not done so.⁶

B. Invenergy must provide both "complete plans as to all structures" in its pre-licensing application, and, if licensed, must then provide "final design drawings and plans for the applicant's energy facility" during post-licensing proceedings.

Under the EFSA and the EFSB Rules, a pre-licensing applicant must submit both "**complete plans as to all structures**" in its pre-licensing application, then, if the license is issued, the applicant must then submit "**final drawings and plans** for the applicant's energy facility"

³ See Invenergy's "Our Projects" website. <https://invenergyllc.com/projects/overview> (last visited August 28, 2017).

⁴ The term "plan" is a noun meaning a "drawing or diagram drawn on a plane." <https://www.merriam-webster.com/dictionary/plan> (last visited August 28, 2017). The term "plan" can also be used as a verb that means "to arrange the parts of." *Id.* In the context of the EFSA legislation, "plan" has been used in its noun form, as shown above. Similarly, the term "architectural plan" is a synonym of the term "plan" which means a "scale drawing of a structure." <https://www.vocabulary.com/dictionary/architectural%20plan> (last visited August 28, 2017).

⁵ The term "detail" is not synonymous with "complete." "Detail" is a noun that means "extended treatment of or attention to particular items" or "a part of a whole." The word "detailed" is an adjective that means "marked by abundant detail or by thoroughness in treating small items or parts." <https://www.merriam-webster.com/dictionary/detail> (last visited August 28, 2017).

⁶ The Town offers no opinion at this time regarding whether Invenergy has provided sufficiently detailed descriptions of the proposed facility to meet the requirements of the EFSA and the Board's Rules, as this is not at issue in the present Motion.

during post-licensing proceedings. R.I.G.L. § 42-98-8(a)(2); EFSB Rule 1.6(b)(8); EFSB Rule 1.14(a)(2) (emphasis added).

Invenergy again attempts to obscure the issue before the EFSB. Invenergy argues that because post-licensing proceedings before the EFSB call for “final” plans, Invenergy should somehow be exempt from providing “complete” plans with its pre-licensing application. This is incorrect.

The terms “complete” and “final” cannot be used interchangeably. According to the Merriam-Webster Dictionary, the word “complete” is an adjective that means “having all necessary parts, elements, or steps.”⁷ The word “final” is an adjective that means “coming at the end” or “being the last in a series, process, or progress.”⁸

As Invenergy notes in its Objection, the EFSB has adopted post-licensure proceedings guidelines which are now found in EFSB Rule 1.14. Part of the post-licensure process requires the applicant to submit “**final** design drawings and plans for the applicant’s energy facility” until after the license has been issued. EFSB Rule 1.14(a)(2) (emphasis added). It is logical for the EFSB to wait to review **final** plans at the end of the licensure process.

However, the requirement for “final” plans in the **post**-licensing process did not replace the requirement that “complete” plans must be filed with the **pre**-licensing application. Even after the adoption of post-licensing proceedings in Rule 1.14, the EFSB expressly retained the

⁷ The term “complete” can also be used as a verb that means “to make whole or perfect.” <https://www.merriam-webster.com/dictionary/complete> (last visited August 28, 2017). In the context of the EFSA legislation, “complete” has been used in its adjective form, as shown above.

⁸ The term “final” can also be used as a noun that means “a deciding match, game, heat, or trial” or “the last examination in a course.” <https://www.merriam-webster.com/dictionary/final> (last visited August 28, 2017). In the context of the EFSA, “final” has been used in its adjective form, as shown above.

requirement that “complete” plans must be submitted with each application. Rule 1.6(b)(4) (“An application shall include the following [...] complete plans as to all structures, including, where applicable, underground construction, transmission facilities, cooling systems, pollution control systems and fuel storage facilities associated with the proposed location of the project.”).⁹

This requirement is mirrored in R.I.G.L. § 42-98-8(a)(2), which states:

The application shall contain at least the following, where applicable: [...] (2) [...] **complete plans** as to all structures, including underground construction and transmission facilities, underground or aerial, associated with the proposed facility.

The **complete plans shall be the basis for determining jurisdiction** under the energy facility siting act and shall be the plans submitted to all agencies whose permit is required under law. (Emphasis added.)

Invenergy must therefore provide “complete plans as to all structures” in order for its pre-licensing application to be complete. However, Invenergy has failed to provide a plan for fifty-four of the fifty-five proposed structures. Invenergy’s application is therefore incomplete as a matter of law, has been for almost two years, and accordingly should be dismissed with prejudice.

C. Invenergy’s failure to provide “complete” plans as to all fifty-five proposed structures renders Invenergy’s pre-licensing application incomplete as a matter of law.

Invenergy argues that “[t]he Town appears to believe that Invenergy must provide detailed design, engineering and construction plans for each of the buildings and equipment...”

Invenergy Objection at 15. This is untrue.

⁹ When the legislature reenacts a statute, and leaves a provision unchanged, the legislature has ratified that provision. “Congress is presumed to be aware of an administrative or judicial interpretation of a statute and to adopt that interpretation when it re-enacts a statute without change.” *Merrill Lynch, Pierce, Fenner & Smith v. Curran*, 456 U.S. 343, 382 n.66 (1982).

For large projects such as Invenergy’s proposed facility, architectural design and engineering firms typically follow a staged process.¹⁰ A proposal evolves from an identified market need and pre-licensing “not for construction” plans at the start to final engineering and construction plans at the end. The level of detail included for each stage increases as the project advances. For example, a typical project may progress as follows: (1) preliminary or schematic design phase, (2) design development phase, and (3) construction document phase. The plans created during the construction document phase often proceed from 50% completion, to 75% completion, and finally to 100% completion. Construction documents that are 100% complete are usually referred to as “issued for construction” plans, whereas plans created in all previous phases are typically stamped as “not for construction” plans.

Invenergy objects to providing “final” or “issued for construction” plans at this point in the EFSB pre-licensing process. The EFSA and the EFSB Rules do not require “final” construction plans for the proposed facility at this stage; nor is the Town’s Motion to Dismiss based on Invenergy’s failure to provide such “final” construction plans. The law requires “complete” design plans (not “final” construction plans) for each of the fifty-five proposed structures during pre-licensing proceedings with enough detail to allow for adequate review by the building official and the EFSB.

For example, Invenergy argues that a “conceptual plan set” provided to the Town on October 14, 2016 constitutes the required “complete plans” for the proposed project. Invenergy’s Objection at 6. However, the “conceptual plan set” that Invenergy refers to is neither “complete”

¹⁰ Refer to the following examples of design and construction processes for large projects:
<http://www.ucop.edu/construction-services/facilities-manual/volume-3/vol-3-chapter-1.html>
<http://facilities.yale.edu/departments/planning-project-management/design-construction-process>
http://hamden.com/filestorage/43/79/Stages_of_Construction.pdf

nor helpful. There are two pages with an aerial view of the proposed facility and surrounding property, along with a single page floor plan for one building.¹¹ See Exhibit A, attached. A simple review makes clear that these three documents do not constitute “complete plans as to all structures.” At a minimum, Invenergy must provide a “not for construction” conceptual plan or schematic for **each** of the fifty-five structures.

To be clear, the Town does not expect Invenergy to provide close-to-final construction plans for each structure with its pre-licensing application. But plans for **each** of the fifty-five proposed structures are required during the pre-licensing application stage to allow the Town and the EFSB to properly review the proposed facility.

The burden is on Invenergy to provide all documents required by law for a complete pre-licensing application, including “complete plans as to **all** structures” for its proposed facility. R.I.G.L. § 42-98-8(a)(2); EFSB Rule 1.6(b)(8). Since Invenergy has failed to do so, its application should be dismissed with prejudice.

D. The EFSB’s ruling in Ocean State Power does not help Invenergy.

In its Objection, Invenergy attempts to argue that its position is supported by a prior EFSB opinion rendered in the Ocean State Power (“OSP”) docket in 1988. Invenergy’s Objection at 9. However, the EFSB’s decision in the OSP docket is fully consistent with the Town’s Motion.

In the OSP decision, the EFSB addresses the need to provide “final” plans, suggesting that such final plans should be submitted after the EFSB license is granted. The OSP decision does not remove the requirement for an applicant to provide “complete” plans with the pre-licensing

¹¹ Invenergy also included thirteen drawings related to Invenergy’s proposed stormwater management plan and drawings related to two buildings from a different energy project in Pennsylvania. None of these drawings depict any of the fifty-five proposed structures Invenergy proposes to build in Rhode Island.

application. The two requirements can and do co-exist within the application process (pre-licensing and post-licensing).

In its decision in the OSP docket, the EFSB held that technical permits, such as building permits, should not be issued until “final construction drawings” are thoroughly reviewed. Therefore, it held that if an EFSB license is granted, such **final** drawings would then be developed, but if an EFSB license is denied “the applicant need not be burdened with the costs of **detailed final design**.” (Emphasis added.) For this reason, the EFSB suggested creating a “post licensure proceeding” wherein building permits could be issued, allowing the applicant to have a “prompt review of its **final building design** without having to commit to **final design** before a decision regarding the overall board license.” (Emphasis added.)

The holding by the EFSB in the OSP docket is entirely consistent with the Town’s Motion to Dismiss Invenergy’s Application for failure to provide **complete** plans as part of the pre-licensing application. **Complete** plans must be submitted with a pre-licensing application. **Final** plans must be submitted during post-licensing proceedings. Therefore, dismissal is proper here.¹³

II. CONCLUSION

WHEREFORE, the Town respectfully requests that the EFSB dismiss this licensing proceeding with prejudice for the failure of Invenergy to provide complete plans as to all structures in its pre-licensing application.

¹³ Moreover, even if the OSP decision could somehow be considered to be inconsistent with the Town’s Motion, which it is not, the Rhode Island Supreme Court has long held that administrative agencies, such as the EFSB, are not bound by prior rulings, decisions or opinions by that agency. *Ricci v. R.I. Dept. of Human Services*, No. PC 07-1068 (R.I. Superior Court, February 28, 2008); *see also Michaelson v. New England Tel. & Tel. Co.*, 404 A.2d 799, 804 n. 5 (R.I. 1979) (holding that in a public utility context an agency is “not bound by either a factual determination reached or a method utilized in an earlier docket”).

The Town requests oral argument on its Motion to Dismiss.

Respectfully submitted,
Town of Burrillville
By its attorneys



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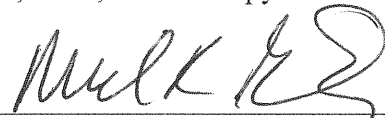
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Date: August 31, 2017

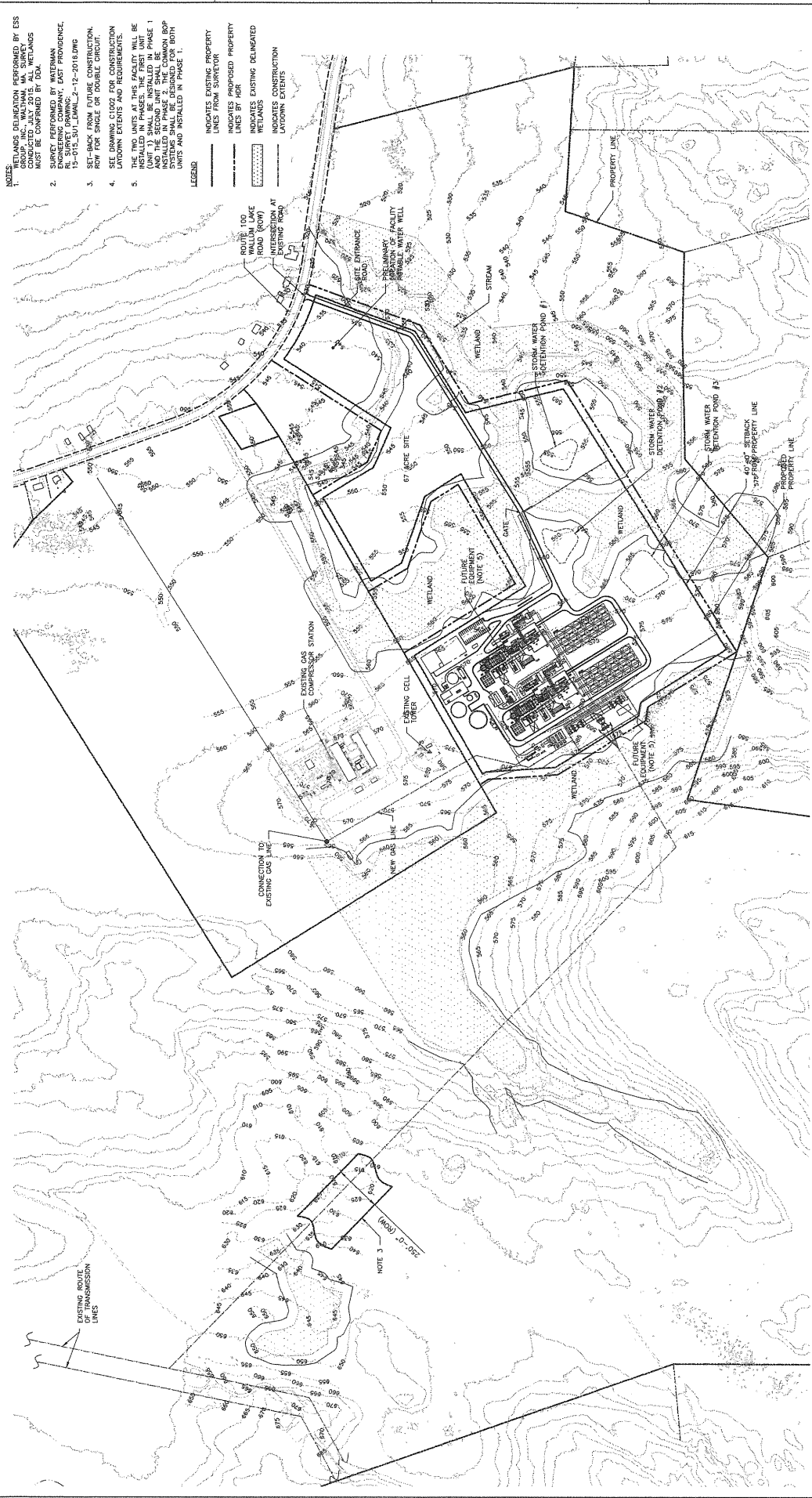
CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August, 2017, I sent a copy of the foregoing to the attached service list.



Michael R. McElroy

Exhibit A



- NOTES:**
1. ALL WORKS INDICATION PERFORMED BY EES GROUP, INC., WALTHAM, MA, SURVEY DATA MUST BE CONFIRMED BY DCM.
 2. SURVEY PERFORMED BY WATERMAN ENGINEERING COMPANY, EAST PROVIDENCE, RI, 15-016.SU_LINEL2-12-2016.DWG
 3. SET-BACK FROM FUTURE CONSTRUCTION ROW FOR SINGLE OR DOUBLE CIRCUIT, LAYOUT EXTENTS AND REQUIREMENTS.
 4. SEE DRAWING C1002 FOR CONSTRUCTION LAYOUT EXTENTS AND REQUIREMENTS.
 5. THE TWO UNITS AT THIS FACILITY WILL BE INSTALLED IN PHASE 1 AND THE SECOND UNIT SHALL BE INSTALLED IN PHASE 2. THE CONSTRUCTION BOP SYSTEMS SHALL BE DESIGNED FOR BOTH UNITS AND INSTALLED IN PHASE 1.

- LEGEND:**
- INDICATES EXISTING PROPERTY LINES FROM SURVEYOR
 - INDICATES PROPOSED PROPERTY LINES BY ARCHITECT
 - INDICATES EXISTING DELINEATED WETLANDS
 - INDICATES CONSTRUCTION LAYOUT EXTENTS

SITE ARRANGEMENT
 SCALE: 1" = 250'-0"
 NORTH

PRELIMINARY NOT FOR CONSTRUCTION OR RECORDING

**INVENERGY, LLC
 CLEAR RIVER ENERGY CENTER**

**SINGLE SHAFT
 SITE ARRANGEMENT**

FILENAME: C1000-00A-238926.dwg
 SCALE: AS NOTED
 SHEET: 238926-00A-C1000

ISSUE	DATE	DESCRIPTION	BY	ENGR	CHK	APPY
4	06 JUL 16	ADDED FENCE LINE	EDC			
3	30 JUN 16	REVISED PROPERTY LINES & SITE ARRANGEMENT	EDC			
2	30 MAR 16	ISSUED FOR PROPERTY SUBDIVISION APPROVAL	EDC			
1	07 MAR 16	ISSUED FOR PROPERTY SUBDIVISION APPROVAL	EDC			
0	02 NOV 15	NOTICE TO PROCEED (NTP) ISSUE	EDC			



40 FOOT SETBACK DISTANCE FROM PROPERTY LINE
 PROPOSED PROPERTY LINE

NOTE 3: FUTURE EQUIPMENT

NOTE 4: FUTURE GAS COMPRESSOR STATION

NOTE 5: FUTURE EQUIPMENT

NOTE 6: FUTURE EQUIPMENT

NOTE 7: FUTURE EQUIPMENT

NOTE 8: FUTURE EQUIPMENT

NOTE 9: FUTURE EQUIPMENT

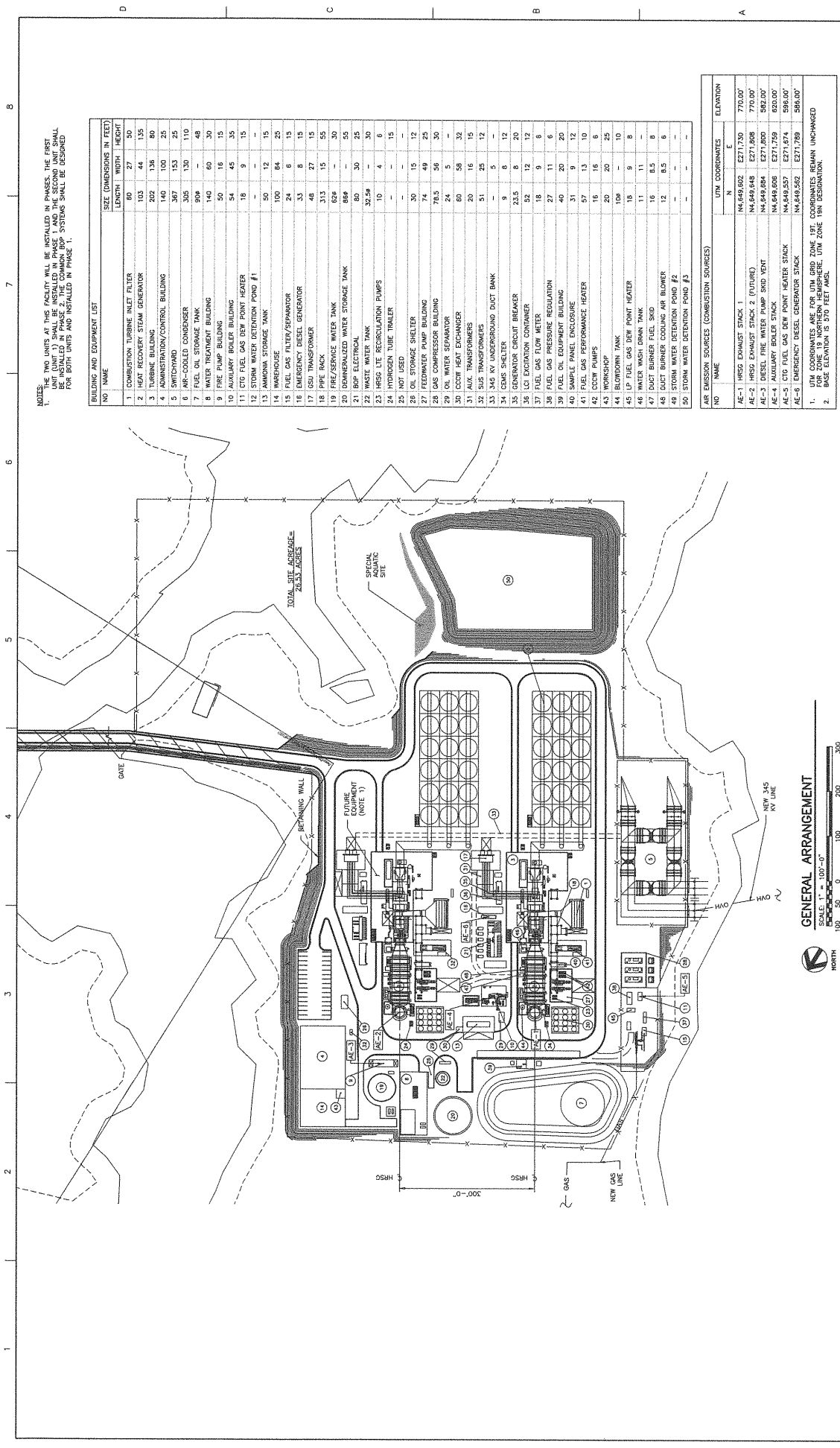
NOTE 10: FUTURE EQUIPMENT

NOTE 11: FUTURE EQUIPMENT

NOTE 12: FUTURE EQUIPMENT

NOTE 13: FUTURE EQUIPMENT

NOTE 14: FUTURE EQUIPMENT



NOTES:
 1. TWO UNITS AT THIS FACILITY WILL BE INSTALLED IN PHASE 1. THE FIRST UNIT (UNIT 1) SHALL BE INSTALLED IN PHASE 1 AND THE SECOND UNIT SHALL BE INSTALLED IN PHASE 2. THE COMMON BOP SYSTEMS SHALL BE DESIGNED FOR BOTH UNITS AND INSTALLED IN PHASE 1.

NO.	NAME	SIZE (DIMENSIONS IN FEET)	
		LENGTH	WIDTH
1	COMBUSTION TURBINE INLET FILTER	40	50
2	HEAT RECOVERY STEAM GENERATOR	103	44
3	TURBINE BUILDING	202	136
4	ADMINISTRATION/CONTROL BUILDING	140	100
5	SWITCHYARD	367	153
6	AIR-COOLED CONDENSER	305	130
7	FUEL OIL STORAGE TANK	808	-
8	WATER TREATMENT BUILDING	140	60
9	FIRE PUMP BUILDING	50	15
10	AUXILIARY BOILER BUILDING	54	45
11	CTG FUEL GAS LEVY POINT HEATER	18	9
12	STORM WATER DETENTION POND #1	-	-
13	AMMONIA STORAGE TANK	50	12
14	WAREHOUSE	100	84
15	FUEL GAS FILTER/SEPARATOR	24	6
16	EMERGENCY DIESEL GENERATOR	33	8
17	GGD TRANSFORMER	48	27
18	PIPE BACK	313	15
19	FIRE SERVICE WATER TANK	628	-
20	CONDENSATE WATER STORAGE TANK	894	-
21	CONDENSATE WATER STORAGE TANK	30	25
22	WASTE WATER TANK	30	25
23	HRSO LITE REGULATION PUMPS	30	8
24	HYDROGEN TUBE TRAILER	10	4
25	NOT USED	-	-
26	OIL STORAGE SHED	30	15
27	FEEDWATER PUMP BUILDING	74	49
28	GAS COMPRESSOR BUILDING	78.5	56
29	OIL WATER SEPARATOR	24	5
30	CCCVT HEAT EXCHANGER	60	58
31	AUX. TRANSFORMERS	20	16
32	SUS TRANSFORMERS	51	25
33	345 KV UNDERGROUND DUCT BANK	-	5
34	CDMS SHELTER	9	6
35	GENERATOR CIRCUIT BREAKER	26.5	6
36	LO EXCITATION CONTAINER	52	12
37	FUEL GAS FLOW METER	18	9
38	FUEL GAS PRESSURE REGULATION	27	11
39	FUEL OIL EQUIPMENT BUILDING	40	20
40	SAMPLE PANEL ENCLOSURE	31	9
41	FUEL GAS PERFORMANCE HEATER	17	13
42	LOCAL PUMPS	15	16
43	LOCAL PUMPS	20	25
44	BURNING TANK	18	8
45	LP FUEL GAS DRY POINT HEATER	11	11
46	WATER WASH DRAIN TANK	11	11
47	DUCT BURNER FUEL SHED	16	8.5
48	DUCT BURNER COOLING AIR BLOWER	12	8.5
49	STORM WATER DETENTION POND #2	-	-
50	STORM WATER DETENTION POND #3	-	-

NO.	NAME	UTM COORDINATES		ELEVATION
		N	E	
AE-1	HRSO EXHAUST STACK 1	146496.602	1271.130	770.00'
AE-2	HRSO EXHAUST STACK 2 (FUTURE)	146496.646	1271.608	770.00'
AE-3	DIESEL FIRE WATER PUMP SHED VENT	146496.664	1271.600	582.00'
AE-4	AUXILIARY BOILER STACK	146496.806	1271.759	620.00'
AE-5	AUXILIARY BOILER FUEL WASH STACK	146496.557	1271.674	586.00'
AE-6	EMERGENCY DIESEL GENERATOR STACK	146496.352	1271.759	586.00'

UTM COORDINATES ARE FOR UTM GRID ZONE 18T. COORDINATES REMAIN UNCHANGED FOR ALL UTM ZONE 18T SUBSTATIONS.
 2. BASE ELEVATION IS 270 FEET AML.

INVENTORY, LLC
CLEAR RIVER ENERGY CENTER

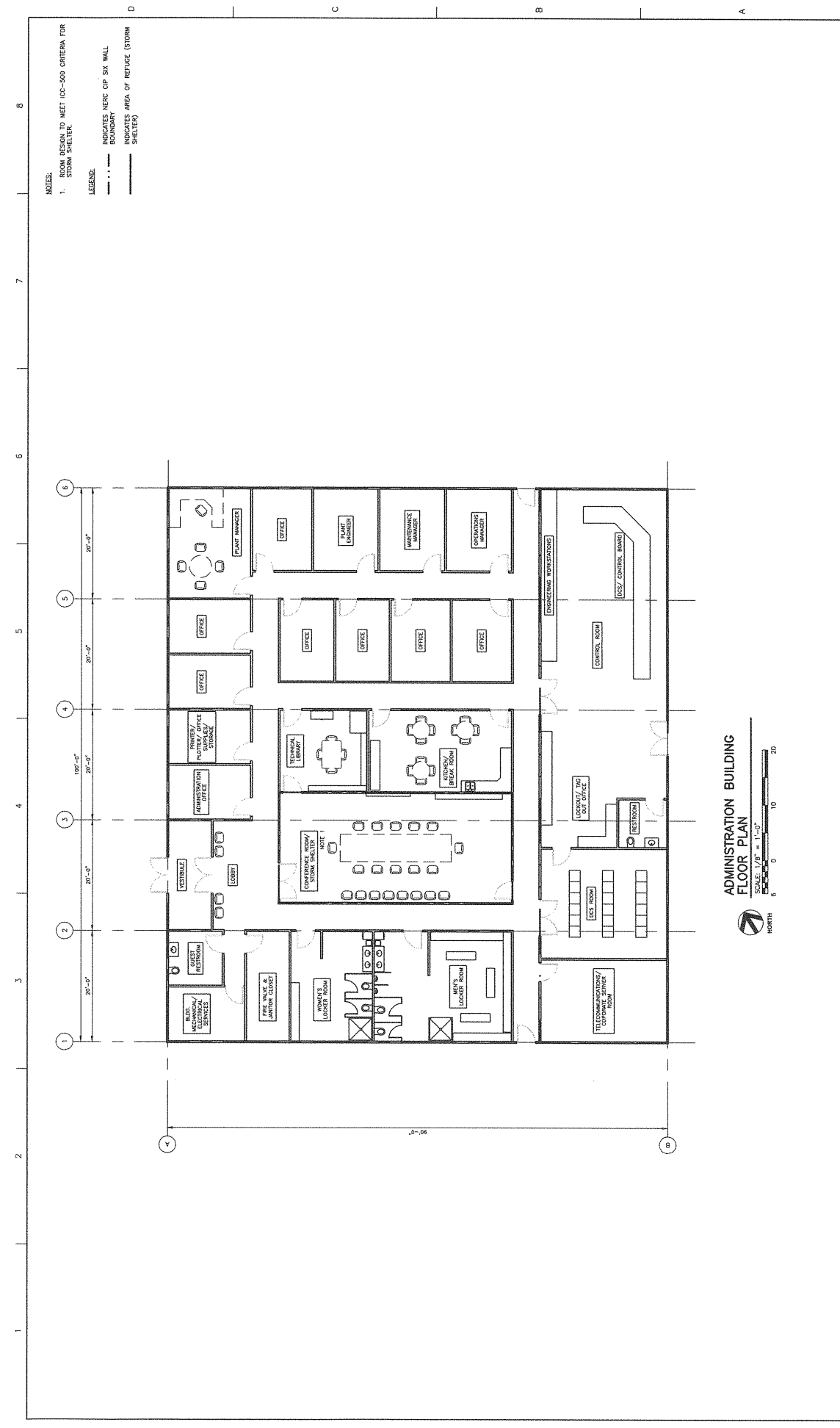
SINGLE SHAFT
GENERAL ARRANGEMENT
MODIFICATIONS TO SUPPORT PERMITTING

PRELIMINARY
NOT FOR
CONSTRUCTION
OR
RECORDING

SCALE: AS NOTED
238926-0GA-C-1001B


NO.	DATE	DESCRIPTION	DRN	ENGR	CHK	APPV
5	21 SEP 16	MODIFICATIONS TO SUPPORT PERMITTING				
4	06 JUL 16	ADDED FENCE LINE				
3	28 JUN 16	ISSUED FOR DISPERSION MODELING UPDATE				
2	30 MAR 16	ISSUED FOR PROPERTY SUBMISSION APPROVAL				
1	07 MAR 16	ISSUED FOR PERMITTING UNIT INSTALLATION				
0	02 NOV 15	ISSUED FOR BID ISSUE				





NOTES:
 1. ROOM DESIGN TO MEET ICC-400 CRITERIA FOR STORM SHELTER.
LEGEND:
 - - - - - INDICATES MERIC CIP SIX WALL BOUNDARY
 - - - - - INDICATES AREA OF REFUGE (STORM SHELTER)

ADMINISTRATION BUILDING FLOOR PLAN
 SCALE: 1/8" = 1'-0"
 NORTH

	ADMINISTRATION BUILDING FLOOR PLAN																						
	FILENAME: A1000-OGA-238926.rvt SCALE: AS NOTED	SHEET 238926-OGA-A1000																					
PRELIMINARY NOT FOR CONSTRUCTION OR RECORDING																							
INVENERGY, LLC CLEAR RIVER ENERGY CENTER																							
<table border="1"> <thead> <tr> <th>ISSUE</th> <th>DATE</th> <th>DESCRIPTION</th> <th>DRN</th> <th>ENGR</th> <th>CHK</th> <th>APPV</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>07 MAR 18</td> <td>BID ISSUE (STAGGERED UNIT INSTALLATION)</td> <td>EDC</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>0</td> <td>02 NOV 15</td> <td>MOI02 BID ISSUE</td> <td>EDC</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>			ISSUE	DATE	DESCRIPTION	DRN	ENGR	CHK	APPV	1	07 MAR 18	BID ISSUE (STAGGERED UNIT INSTALLATION)	EDC	-	-	-	0	02 NOV 15	MOI02 BID ISSUE	EDC	-	-	-
ISSUE	DATE	DESCRIPTION	DRN	ENGR	CHK	APPV																	
1	07 MAR 18	BID ISSUE (STAGGERED UNIT INSTALLATION)	EDC	-	-	-																	
0	02 NOV 15	MOI02 BID ISSUE	EDC	-	-	-																	

SB-2015-06 Invenergy CREC Service List as of 07/11/2017

Name/Address	E-mail	Phone/FAX
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