

September 21, 2017

**Via Federal Express/Electronic Mail**

Todd Anthony Bianco, EFSB Coordinator  
RI Energy Facility 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”), we provide the following information to identify the individuals that will be adopting certain responses to certain Invenergy data responses. These individuals, adopting the responses to certain data requests, will be available, if needed, at the hearings.

- Invenergy’s responses to the Conservation Law Foundation’s (“CLF’s”) Data Requests Nos. 1-3 – 1-4, 2-5 – 2-7, 2-9 – 2-11, 2-18, identify Mark Repsher and others as the Respondents. Mark Repsher will not be testifying, and Ryan Hardy will be available to respond to any questions regarding these Data Requests.
- Invenergy’s response to the Town of Burrillville’s (“Town’s”) Data Request, No. 1-17, identifying Craig Wood as the Respondent, will be adopted by Jason Ringler and Jim Riordan.
- Invenergy’s responses to the Town’s Data Requests, Nos. 1-1 – 1-12, 2-1 – 2-5, 2-6, 6-8 and CLF’s Data Request, No. 4-1, identify Mike Theriault (and sometimes others) as the Respondent(s). Mike Theriault will not be testifying, and Michael Hankard will be available to respond to any questions regarding these Data Requests.
- Invenergy’s response to the Energy Facility Siting Board’s Data Request, No. 1-3, identifying Meghan Wims and John Niland as Respondents, will be adopted by John Niland only.
- The following data responses identified Amit Nadkarni as the Respondent, and these will be adopted by the following witnesses:
  - Mark Wiitanen adopts the following Amit Nadkarni data responses: Invenergy’s responses to CLF’s Data Request, No. 4-1; Invenergy’s responses to the Town’s Data Requests, Nos. 6-7, 6-12, 22-3, 22-30 – 22-35, 22-56, 25-2 – 25-5;

- George Bacon adopts the following Amit Nadkarni data responses: Invenergy's responses to the Town's Data Requests, Nos. 8-1 – 8-2, 22-2, 22-8 – 22-11, 22-24, 22-30 – 22-34; and
- John Niland adopts the following Amit Nadkarni data responses: Invenergy's responses to the Town's Data Requests, Nos. 6-12, 22-8 – 22-11 and 22-40.
- Invenergy's responses to the Town's Data Requests, Nos. 9-1 – 9-7 and the Rhode Island Department of Environmental Management's ("RIDEM's") Data Requests, Nos. 1-1 – 1-6, 1-10 – 1-13, 1-15 – 1-17, 3-3 – 3-4, 3-16, 3-60, identify Daniel Mitas (and sometimes others) as the Respondent(s). Daniel Mitas will not be testifying, and Mark Wiitanen will be available to respond to any questions regarding these Data Requests.
- Invenergy's response to RIDEM's Data Request, No. 2-7, identifying William Ahlert as the Respondent, will be adopted by George Bacon.
- Invenergy's responses to RIDEM's Data Requests, Nos. 3-36 and 3-37, identifying Benjamin Cotts as the Respondent, will be adopted by William Bailey.
- Invenergy's response to the Town's Data Request, No. 22-13, identifying Daniel Ewan, as the Respondent, will be adopted by John Niland and George Bacon.
- Invenergy's response to the Division of Planning's Data Request of March 29, 2017, identifying Edinaldo Tabaldi as the Respondent, will be adopted by Mason Smith.
- Invenergy's responses to RIDEM's Data Requests, Nos. 4-14, 4-19, 4-21, 4-27, 4-28, 4-32 – 4-33, 4-38 list Jamie Durand (and sometimes others) as the Respondent(s). Jamie Durand is not expected to testify because the information in his responses relates to the TNEC right-of-way which is the subject of a separate EFSB proceeding. *See* Docket No. SB-2017-01.
- Although Harri Kytomaa is not testify as an Invenergy witness, he will be available to answer questions regarding the data request responses that he authored (Invenergy's responses to the Town's Data Requests, Nos. 17-1 – 17-4, 27-1, 27-21).

Additionally, the following data responses that identified John Niland as the Respondent will *also* be adopted by the following witnesses:

- George Bacon adopts and will be available to respond to questions regarding Invenergy's response to RIDEM's Data Request, No. 4-1 and Invenergy's responses to the Town's Data Requests, Nos. 4-24, 4-26, 7-2, 21-1 – 21-7, 22-29, 22-38, 23-4;
- Brandon Blanchard adopts and will be available to respond to questions regarding Invenergy's response to the Town's Data Request, No. 22-4;
- Michael Feinblatt adopts and will be available to respond to questions regarding Invenergy's response to the EFSB's Data Request, No. 1-4 and Invenergy's responses to the Town's Data Requests, Nos. 4-45, 19-1, 22-17, 22-29;
- Michael Hankard adopts and will be available to respond to questions regarding Invenergy's responses to the Town's Data Requests, Nos. 4-30, 4-41

- Ryan Hardy adopts and will be available to respond to questions regarding Invenergy's response to RIDEM Data Request, No. 3-14 and Invenergy's responses to the Town's Data Requests, Nos. 5-15, 7-2, 15-2, 16-1 – 16-4, 18-2, 22-20 – 22-22, 27-22;
- Jeffery Hershberger adopts and will be available to respond to questions regarding Invenergy's responses to the Town's Data Requests, Nos. 22-36 and 22-37;
- Trevor Hollins adopts and will be available to respond to questions regarding Invenergy's response to RIDEM's Data Request, No. 3-57;
- Chad Jacobs adopts and will be available to respond to questions regarding Invenergy's responses to the Town's Data Requests, Nos. 4-1, 4-2, 4-6, 4-9, 18-1;
- Harri Kytomaa adopts and will be available to respond to questions regarding Invenergy's responses to the Town's Data Requests, Nos. 17-1 – 17-4;
- Gordon Perkins adopts and will be available to respond to questions regarding Invenergy's response to the Town's Data Request, No. 12-1;
- Jason Ringler adopts and will be available to respond to questions regarding Invenergy's response to RIDEM's Data Request, No. 3-54; and
- Mark Wiitanen adopts and will be available to respond to questions regarding Invenergy's responses to the Town's Data Requests, Nos. 4-3 – 4-5, 4-24, 4-26, 4-31 – 4-34, 4-38 – 4-40, 15-1, 21-1 – 21-7, 22-1, 22-5 – 22-7, 22-15, 22-18, 22-29, 23-2 – 23-5.

All the other individuals identified on the remaining Invenergy responses to data requests will, if needed, be available at the hearings.<sup>1</sup>

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

---

<sup>1</sup> Additionally, it should be noted that, in response to the Town's Data Request, No. 38-3, Invenergy will be filing a chart identifying the data responses each witness will be sponsoring.