

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a DOCKET No. SB-2017-01
NATIONAL GRID AND CLEAR RIVER ENERGY LLC'S
JOINT APPLICATION TO CONSTRUCTION THE
BURRILLVILLE INTERCONNECTION PROJECT

CLEAR RIVER ENERGY LLC'S RESPONSES TO
THE TOWN OF BURRILLVILLE'S 1ST SET OF DATA REQUESTS

Request 1-2 Do you believe that a ROW agreement between Clear River and National Grid will be executed? If so, please explain your reasons for this belief and when you believe that such an agreement will be executed.

RESPONSE 1-2 Yes. There are not expected to be any outstanding issues between the parties. We would expect an agreement would be executed in the near future.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: January 29, 2018

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a DOCKET No. SB-2017-01
NATIONAL GRID AND CLEAR RIVER ENERGY LLC'S
JOINT APPLICATION TO CONSTRUCTION THE
BURRILLVILLE INTERCONNECTION PROJECT

CLEAR RIVER ENERGY LLC'S RESPONSES TO
THE TOWN OF BURRILLVILLE'S 1ST SET OF DATA REQUESTS

Request 1-3 Please provide a copy of any drafts of this ROW agreement that exist and also
provide a copy of any executed ROW agreement if and when it is in fact
executed.

RESPONSE 1-3 National Grid has yet to provide a draft of this agreement to Clear River.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: January 29, 2018

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a DOCKET No. SB-2017-01
NATIONAL GRID AND CLEAR RIVER ENERGY LLC'S
JOINT APPLICATION TO CONSTRUCTION THE
BURRILLVILLE INTERCONNECTION PROJECT

CLEAR RIVER ENERGY LLC'S RESPONSES TO
THE TOWN OF BURRILLVILLE'S 1ST SET OF DATA REQUESTS

Request 1-4 What is the amount that you anticipate Clear River will have to pay to National Grid under this ROW agreement? Please explain if this amount is currently included in the cost estimates for this project filed with the PUC and the EFSB and provide the basis for this estimate.

RESPONSE 1-4 The amount to be paid for an ROW usage fee on an annual basis is still under discussion. The cost estimates that were filed with the PUC are the capital costs for engineering, procurement and construction and do not include operating costs which this fee represents.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: January 29, 2018

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a DOCKET No. SB-2017-01
NATIONAL GRID AND CLEAR RIVER ENERGY LLC'S
JOINT APPLICATION TO CONSTRUCTION THE
BURRILLVILLE INTERCONNECTION PROJECT

**CLEAR RIVER ENERGY LLC'S RESPONSES TO
THE TOWN OF BURRILLVILLE'S 1ST SET OF DATA REQUESTS**

Request 1-5 What options, if any, does Clear River have with regard to completing this project if Clear River and National Grid fail to execute a ROW agreement?

RESPONSE 1-5 A ROW Agreement will be executed.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: January 29, 2018

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a DOCKET No. SB-2017-01
NATIONAL GRID AND CLEAR RIVER ENERGY LLC'S
JOINT APPLICATION TO CONSTRUCTION THE
BURRILLVILLE INTERCONNECTION PROJECT

**CLEAR RIVER ENERGY LLC'S RESPONSES TO
THE TOWN OF BURRILLVILLE'S 1ST SET OF DATA REQUESTS**

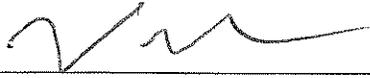
Request 1-6 Has Clear River/Invenergy begun negotiating any alternative electric transmission rights of way with any party, including, but not limited to, rights of way within a natural gas pipe line corridor or within municipal rights of way? If so, please provide all details.

RESPONSE 1-6 Clear River has not had any negotiations concerning alternative electric transmission rights of way with any party, including, but not limited to, rights of way within a natural gas pipe line corridor or within municipal rights of way. Clear River did evaluate other alternatives as described in Section 5.4.2 of the EFSB application.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: January 29, 2018

CLEAR RIVER ENERGY LLC
By its Attorneys,

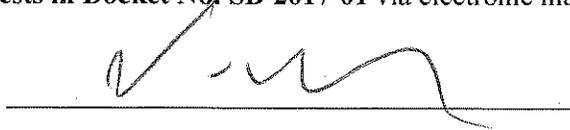


W. Mark Russo (#3937)
Ferrucci Russo P.C.
55 Pine Street, 3rd Floor
Providence, RI 02903
Providence, RI 02903-1345
Tel.: (401) 455-1000
Fax: (401) 455-7778
mrusso@frlawri.com

Dated: January 29, 2018

CERTIFICATE OF SERVICE

I hereby certify that on January 29th, 2018, I delivered a true copy of the foregoing responses to the **Town of Burrillville's 1st Set of Data Requests in Docket No. SB-2017-01** via electronic mail to the parties on the attached service list.



SB-2017-01 Burrillville Interconnection Project Service List as of 10/12/2017

| Name/Address | E-mail | Phone/FAX |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------|
| <p>File an original and 6 copies with EFSB: Todd Bianco, Coordinator Energy Facility Siting Board 89 Jefferson Boulevard Warwick, RI 02888</p> <p>Margaret Curran, Chairperson Janet Coit, Board Member Assoc. Dir., Div. of Planning Parag Agrawal Patti Lucarelli Esq., Board Counsel Susan Forcier Esq., Counsel Rayna Maguire, Asst. to the Director DEM Catherine Pitassi, Asst. to. Assoc. Dir. Plann. Margaret Hogan, Sr. Legal Counsel</p> | Todd.Bianco@puc.ri.gov; | 401-780-2106 |
| | Kathleen.Mignanelli@puc.ri.gov; | |
| | Patricia.lucarelli@puc.ri.gov; | |
| | Margaret.Curran@puc.ri.gov; | |
| | janet.coit@dem.ri.gov; | |
| | Catherine.Pitassi@doa.ri.gov; | |
| | Margaret.hogan@puc.ri.gov; | |
| | susan.forcier@dem.ri.gov; | |
| | rayna.maguire@dem.ri.gov; | |
| | Parag.Agrawal@doa.ri.gov; | |
| <p>Parties (Electronic Service Only, Unless by Request)</p> | | |
| <p>Peter Lacouture George Watson, III Robinson and Cole LLP One Financial Plaza, Suite 1430 Providence RI, 02903</p> <p>Bess B. Gorman, Esq. Assistant General Counsel and Director Mark Rielly, Esq. Senior Counsel Legal Department, National Grid 40 Sylvan Road Waltham, MA 02451</p> | placouture@rc.com; | 401-709-3314 |
| | gwatson@rc.com; | |
| | Bess.Gorman@nationalgrid.com; | 781-907-1834 |
| | mark.rielly@nationalgrid.com; | 781-907-2111 |
| <p>Invenergy Thermal Development LLC Alan Shoer, Esq. Richard Beretta, Esq. Elizabeth Noonan, Esq. Nicole Verdi, Esq. Adler, Pollock & Sheehan One Citizens Plaza, 8th Floor Providence, RI 02903</p> <p>John Niland, Dir. Of Business Development Michael Blazer, Senior VP and General Counsel Tyrone Thomas, Esq., Asst. General Counsel Invenergy Thermal Development LLC One South Wacker Drive, Suite 1900 Chicago, IL 60600</p> | ashoer@apslaw.com; | 401-274-7200 |
| | rberetta@apslaw.com; | |
| | enoonan@apslaw.com; | |
| | nverdi@apslaw.com; | |
| | jiniland@invenergylc.com; | 312-638-8488 |
| | mblazer@invenergylc.com; | |
| Tthomas@invenergylc.com; | | |
| <p>Town of Burrillville Michael McElroy, Esq., Special Counsel Leah Donaldson, Esq., Special Counsel</p> | Michael@mcelroylawoffice.com; | 401-351-4100 |

| | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------|
| Schacht & McElroy PO Box 6721 Providence, RI 02940-6721 | leah@mcelroylawoffice.com ; | |
| William Dimitri, Esq., Acting Town Solicitor | dimitrilaw@icloud.com ; | 401-273-9092 |
| Interested Persons (Electronic Service Only) | | |
| Conservation Law Foundation Jerry Elmer, Esq. Max Greene, Esq. 235 Promenade Street Suite 560, Mailbox 28 Providence RI, 02908 | Jelmer@clf.org ; | 401-351-1102 |
| | Mgreene@clf.org ; | |
| Office of Energy Resources Andrew Marcaccio, Esq. Nick Ucci, Chief of Staff Chris Kearns, Chief Program Development One Capitol Hill Providence, RI 02908 Ellen Cool Levitan & Associates | Andrew.Marcaccio@doa.ri.gov ; | 401-222-3417 |
| | Nicholas.Ucci@energy.ri.gov ; | 401-574-9100 |
| | Christopher.Kearns@energy.ri.gov ; | |
| | egc@levitan.com ; | |
| | Brenna.McCabe@doa.ri.gov ; | |
| Rhode Island Building and Construction Trades Council Gregory Mancini, Esq. Sinapi Law Associates, Ltd. 2374 Post Road, Suite 201 Warwick, RI 02886 | gmancinilaw@gmail.com ; | 401-739-9690 |
| Residents of Wallum Lake Road, Pascoag, RI Dennis Sherman and Kathryn Sherman Christian Capizzo, Esq. Partridge Snow & Hahn, LLP 40 Westminster St., Suite 1100 Providence, RI 02903 | cfc@psh.com ; | 401-272-1400 |
| | kags8943@gmail.com ; | |
| Residents of Wallum Lake Road, Pascoag, RI Paul Bolduc and Mary Bolduc Joseph Keough Jr., Esq. 41 Mendon Avenue Pawtucket, RI 02861 Paul and Mary Bolduc 915 Wallum Lake Road Pascoag, RI 02859 | jkeoughjr@keoughsweeney.com ; | 401-724-3600 |
| | oatyssl@verizon.net ; | 401-529-0367 |
| Abutter David B. Harris Michael Sendley, Esq. 600 Putnam Pike, St. 13 Greenville, RI 02828 | mSENDLEY@cox.net ; | 401-349-4405 |
| Harrisville Fire District Richard Sinapi, Esq. | ras@sinapilaw.com ; | 401-739-9690 |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|--------------|
| Joshua Xavier, Esq. 2347 Post Road, Suite 201 Warwick, RI 02886 | idx@sinapilaw.com ; | |
| Residents of 945 Wallum Lake Road, Pascoag, RI (Walkers) Nicholas Gorham, Esq. P.O. Box 46 North Scituate, RI 02857 | nickgorham@gorhamlaw.com ; | 401-647-1400 |
| | edaigle4@gmail.com ; | |
| Peter Nightingale, member Fossil Free Rhode Island 52 Nichols Road Kingston, RI 02881 | divest@fossilfreeri.org ; | 401-789-7649 |
| Sister Mary Pendergast, RSM 99 Fillmore Street Pawtucket, RI 02860 | mpendergast@mercayne.org ; | 401-724-2237 |
| Patricia J. Fontes, member Occupy Providence 57 Lawton Foster Road South Hopkinton, RI 02833 | Patfontes167@gmail.com ; | 401-516-7678 |
| Burrillville Land Trust Marc Gertsacov, Esq. Law Offices of Ronald C. Markoff 144 Medway Street Providence, RI 02906 Paul Roselli, President Burrillville Land Trust PO Box 506 Harrisville, RI 02830 | marc@ronmarkoff.com ; | 401-272-9330 |
| | proseli@cox.net ; | 401-447-1560 |
| Rhode Island Progressive Democrats of America Andrew Aleman, Esq. 168 Elmgrove Avenue Providence, RI 02906 | andrew@andrewaleman.com ; | 401-429-6779 |
| Fighting Against Natural Gas and Burrillville Against Spectra Expansion Jillian Dubois, Esq. The Law Office of Jillian Dubois 91 Friendship Street, 4 th Floor Providence, RI 02903 | jillian.dubois.esq@gmail.com ; | 401-274-4591 |
| Burrillville Town Council c/o Louise Phaneuf, Town Clerk 105 Harrisville Main Street Harrisville, RI 02830 | lphaneuf@burrillville.org ; | 401-568-4300 |
| Christine Langlois, Deputy Planner Town of Burrillville | clanglois@burrillville.org ; | 401-568-4300 |

| | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------|
| 144 Harrisville Main Street Harrisville, RI 02830 Joseph Raymond, Building Official | jraymond@burrillville.org ; | |
| Michael C. Wood, Town Manager Town of Burrillville 105 Harrisville Main Street Harrisville, RI 02830 | mewood@burrillville.org ; | 401-568-4300 ext. 115 |
| Mr. Leo Wold, Esq. Department of Attorney General 150 South Main Street Providence, RI 02903 | LWold@riag.ri.gov ; | 401-274-4400 |
| Public Utilities Commission Cynthia Wilson Frias, Esq., Dep. Chief of Legal Alan Nault, Rate Analyst | Cynthia.Wilsonfrias@puc.ri.gov ; | 401-941-4500 |
| | Alan.nault@puc.ri.gov ; | |
| Division of Public Utilities and Carriers John J. Spirito, Esq., Chief of Legal Steve Scialabba, Chief Accountant Tom Kogut, Chief of Information | john.spirito@dpuc.ri.gov ; | 401-941-4500 |
| | steve.scialabba@dpuc.ri.gov ; | |
| | thomas.kogut@dpuc.ri.gov ; | |
| Matthew Jerzyk, Deputy Legal Counsel Office of the Speaker of the House State House, Room 302 Providence RI, 02903 | mjerzyk@rilin.state.ri.us ; | 401-222-2466 |
| Hon. Cale Keable, Esq., Representative of Burrillville and Glocester | Cale.keable@gmail.com ; | 401-222-2258 |
| Nick Katkevich | nkatkevich@gmail.com ; | |
| Avory Brookins | abrookins@ripr.org ; | |
| Joseph Bucci, Acting Administrator Highway and Bridge Maintenance Operations RI Department of Transportation | joseph.bucci@dot.ri.gov ; | |
| Kevin Nelson, Supervising Planner Statewide Planning Program Jennifer Sternick Chief of Legal Services RI Department of Administration | kevin.nelson@doa.ri.gov ; | |
| | Jennifer.sternick@doa.ri.gov ; | |
| Doug Gablinske, Executive Director TEC-RI | doug@tecri.org ; | |
| Tim Faulkner ecoRI News 111 Hope Street Providence, RI 02906 | tim@ecori.org ; | 401-330-6276 |
| Robert Tormey Conanicut Energy, LLC | rtormey@conanicutenergy.com ; | 617-306-1601 |

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------|
| Sally Mendzela | salgalpal@hotmail.com ; | |
| Keep Burrillville Beautiful Paul LeFebvre | paul@acumenriskgroup.com ; | 401-714-4493 |
| Mark Baumer | everydayyeah@gmail.com ; | |
| Nisha Swinton Food & Water Watch New England | nswinton@fwwatch.org ; | |
| Kaitlin Kelliher | Kaitlin.kelliher@yahoo.com ; | |
| Joe Piconi, Jr. | jiggzy@hotmail.com ; | |
| Hon. Aaron Regunberg Representative of Providence, District 4 | Aaron.regunberg@gmail.com ; | |
| Paul Ernest | paulwernest@gmail.com ; | |
| Skip Carlson | scarlson@metrocast.net ; | |
| Kathryn Scaramella | kscaramella@outlook.com ; | |
| Diana Razzano | Dlrazzano13@verizon.net ; | |
| David Goldstein | tmdgroup@yahoo.com ; | |
| Douglas Jobling | djobling@cox.net ; | |
| Claudia Gorman | corkyhg@gmail.com ; | |
| Curt Nordgaard | Curt.nordgaard@gmail.com ; | |
| Colleen Joubert | Colleenj1@cox.net ; | |
| Matt Smith Food & Water Watch | msmith@fwwatch.org ; | |
| Christina Hoefsmit, Esq. Senior Legal Counsel RI Department of Environmental Management | Christina.hoefsmit@dem.ri.gov ; | |
| Steven Ahlquist, RIFuture | atomicsteve@gmail.com ; | |
| Pascoag Utility District William Bernstein, Esq. Michael Kirkwood, General Manager Robert Ferrari, Northeast Water Solutions, Inc. | mkirkwood@pud-ri.org ; | |
| | Wlblaw7@gmail.com ; | |
| | rferrari@nwsri.net ; | |
| Russ Olivo Woonsocket Call | rolivo232@gmail.com ; | |
| Celine Schmidt | celine_schmidt@brown.edu ; | |
| Suzanne Enser | svetromile@gmail.com ; | |
| Rhode Island Student Climate Coalition | riscc@brown.edu ; | |