

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

CONSERVATION LAW FOUNDATION'S
FIFTH SET OF DATA REQUESTS DIRECTED TO INVENERGY

- 5-1. Please provide copies of any permit applications Invenergy has filed with the Army Corps of Engineers.
- 5-2. Please provide copies of all correspondence between Invenergy and the Army Corps of Engineers.
- 5-3. What will the carbon dioxide emissions be from the proposed plant be (expressed in pounds per megawatt hour) when the plant is operational and is duct burning: (a) natural gas; (b) ULSD?
- 5-4. Is it true today that "[t]he CREC project has not been segmented." (See Invenergy's Responses to Burrillville's 8th Set of Data Requests, Response 8-6, dated May 16, 2016, page 8 of 19.)

CONSERVATION LAW FOUNDATION,
by its Attorneys,



Jerry Elmer (# 4394)

Max Greene (# 7921)

CONSERVATION LAW FOUNDATION

55 Dorrance Street, Suite 202

Providence, RI 02903

Telephone: (401) 228-1904 (direct)

E-Mail: JElmer@CLF.org

E-Mail: MGreene@CLF.org

CERTIFICATE OF SERVICE

I certify that the original and ten copies of this Data Request were sent to the Energy Facility Siting Board, by first-class mail postage prepaid. In addition, PDF copies of the Data Request were served electronically on the entire service list of this Docket. I certify that all of the foregoing was done on July 5, 2016.



Bianco, Todd (PUC)

From: Bianco, Todd (PUC)
Sent: Wednesday, July 06, 2016 1:14 PM
To: 'Jerry Elmer'
Cc: Lucarelli, Patricia (PUC); Curran, Margaret (PUC); Coit, Janet (DEM); Forcier, Susan (DEM); Maguire, Rayna (DEM); Agrawal, Parag (DOA); ashoer@apslaw.com; rberetta@apslaw.com; enoonan@apslaw.com; nverdi@apslaw.com; jniland@invenergyllc.com; Tthomas@invenergyllc.com; Michael@mcelroylawoffice.com; leah@mcelroylawoffice.com; Nikolyszyn@gmail.com; Max Greene; Bess.Gorman@nationalgrid.com; Marcaccio, Andrew; Ucci, Nicholas (DOA); Kearns, Christopher (DOA); egc@levitan.com; gmancinilaw@gmail.com; ccapizzo@shslawfirm.com; kags8943@gmail.com; jkeoughjr@keoughsweeney.com; oatyss1@verizon.net; msendley@cox.net; nickgorham@gorhamlaw.com; edaigle4@gmail.com; divest@fossilfreeri.org; mpendergast@mercyne.org; Patfontes167@gmail.com; marc@ronmarkoff.com; proselli@cox.net; andrew@andrewaleman.com; jillian.dubois.esq@gmail.com; lphaneuf@burrillville.org; tkravitz@burrillville.org; jraymond@burrillville.org; mcwood@burrillville.org; LWold@riag.ri.gov; WilsonFrias, Cynthia (PUC); Nault, Alan (PUC); Spirito, John (DPUC); Scialabba, Steve (DPUC); Kogut, Thomas (DPUC); mjerzyk@rilin.state.ri.us; Cale.keable@gmail.com; nkatkevich@gmail.com; aespinoza@ripr.org; Bucci, Joseph (DOT); Rhodes, Jared (DOA); Sternick, Jennifer (DOA); doug@tecri.org; tim@ecori.org; rjtormey@conanicutenergy.com; salgalpal@hotmail.com; paul@acumenriskgroup.com; everydayyeah@gmail.com; nswinton@fwwatch.org; Kaitlin.kelliher@yahoo.com; jiggzy@hotmail.com; Aaron.regunberg@gmail.com; paulwernest@gmail.com; scarlson@metrocast.net; kscaramella@outlook.com; Dlrazzano13@verizon.net; tmdgroup@yahoo.com; djobling@cox.net; corkyhg@gmail.com; Curt.nordgaard@gmail.com; Colleenj1@cox.net; msmith@fwwatch.org; Hoefsmit, Christina (DEM)
Subject: RE: Invenergy Case - CLF Data Requests
Attachments: CLF Sixth Set DR to Invenergy 07-06-16.pdf

Jerry,

Thank you (and Nick) for pointing out the error. If there's need to correct the record, we'll do it at the hearings.

Alan,

Since Invenergy's responses are what I anticipate will be entered, Invenergy will respond to the attached data requests as "Invenergy Thermal Development LLC's responses to Conservation Law Foundation's sixth set of data requests received July 6, 2016."

Please feel free to contact me if you have any questions.

Regards,

Todd

Todd Anthony Bianco, Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888
401-780-2106

From: Jerry Elmer [mailto:jelmer@clf.org]
Sent: Wednesday, July 06, 2016 9:48 AM
To: Bianco, Todd (PUC) <Todd.Bianco@puc.ri.gov>
Cc: **Subject:** RE: Invenergy Case - CLF Data Requests

July 6, 2016

Todd:

Nick Ucci has pointed out to me, correctly, that the Data Requests that CLF served yesterday in Docket SB 2015-06 were CLF's Sixth Set, despite being mis-named (by me) the Fifth Set. I would appreciate it if the EFSB would treat the document served yesterday as the Sixth Set; however, if you believe that CLF needs to re-title the document and re-serve the entire list, we will certainly do so. (And if we are required to do that, CLF would certainly have no objection to Invenergy treating the Data Requests as having been served on the latter date for purposes of calculating a due date.)

Jerry

Jerry Elmer

Senior Attorney
Conservation Law Foundation

55 Dorrance Street
Providence, RI 02903

P: 401-228-1904
E: jelmer@clf.org



From: Jerry Elmer
Sent: Tuesday, July 05, 2016 10:05 AM
To: Bianco, Todd (PUC); Lucarelli, Patricia (PUC); Curran, Margaret (PUC); Coit, Janet (DEM); Forcier, Susan (DEM); Maguire, Rayna (DEM); Agrawal, Parag (DOA); ashoer@apslaw.com; rberetta@apslaw.com; enoonan@apslaw.com; nverdi@apslaw.com; jniland@invenergyllc.com; Tthomas@invenergyllc.com; Michael@mcelroylawoffice.com; leah@mcelroylawoffice.com; Nikolyszyn@gmail.com; Max Greene; Bess.Gorman@nationalgrid.com; Marcaccio, Andrew; Ucci, Nicholas (DOA); Kearns, Christopher (DOA); egc@levitan.com; gmancinilaw@gmail.com; ccapizzo@shslawfirm.com; kags8943@gmail.com; jkeoughjr@keoughsweeney.com; oatyss1@verizon.net; mSENDLEY@cox.net; nickgorham@gorhamlaw.com; edaigle4@gmail.com; divest@fossilfreeri.org; mpendergast@mercyne.org; Patfontes167@gmail.com; marc@ronmarkoff.com; proseli@cox.net; andrew@andrewaleman.com; jillian.dubois.esq@gmail.com; lphaneuf@burrillville.org; tkravitz@burrillville.org; jraymond@burrillville.org; mcwood@burrillville.org; LWold@riag.ri.gov; WilsonFrias, Cynthia (PUC); Nault, Alan (PUC); Spirito, John (DPUC); Scialabba, Steve (DPUC); Kogut, Thomas (DPUC); mjerzyk@rilin.state.ri.us; Cale.keable@gmail.com; nkatkevich@gmail.com; aespinoza@ripr.org; Bucci, Joseph (DOT); Rhodes, Jared (DOA); Sternick, Jennifer (DOA); doug@tecri.org; tim@ecori.org; rjormey@conanicutenergy.com; salgalpal@hotmail.com; paul@acumenriskgroup.com;

everydayyeah@gmail.com; nswinton@fwwatch.org; Kaitlin.kelliher@yahoo.com; jiggzy@hotmail.com;
Aaron.regunberg@gmail.com; paulwernest@gmail.com; scarlson@metrocast.net; kscaramella@outlook.com;
DLrazzano13@verizon.net; tmdgroup@yahoo.com; djobling@cox.net; corkyhg@gmail.com; Curt.nordgaard@gmail.com;
Colleenj1@cox.net; msmith@fwwatch.org; Hoefsmit, Christina (DEM)

Subject: Invenergy Case - CLF Data Requests

July 5, 2016

To: Service List in Docket SB 2015-06

Attached, please find CLF's Fifth Set of Data Requests to Invenergy. The original and 10 copies are being filed (via mail) with the EFSB today.

Jerry Elmer

Jerry Elmer

Senior Attorney
Conservation Law Foundation

55 Dorrance Street
Providence, RI 02903

P: 401-228-1904

E: jelmer@clf.org

