

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
FIRST DATA REQUEST DIRECTED TO INVENERGY

1-1. A copy of the material transmitted by ESS Group on behalf of Invenergy on October 30, 2015 to Doug McVay, R.I. Department of Environmental Management, entitled "Air Dispersion Modeling Report – Clear River Energy Center – Burrillville, Rhode Island."

1-2. A copy of the material transmitted by ESS Group on behalf of Invenergy on June 26, 2015 to Barbara Morin, R.I. Department of Environmental Management, entitled "Health Risk Assessment Protocol – Clear River Energy Center – Burrillville, Rhode Island."

1-3. This Data Request pertains to PowerPoint Slide 21 used by Invenergy at the January 12, 2016 Preliminary Hearing, specifically this sentence: "By displacing older, inefficient plants Clear River is projected to save ratepayers \$280 million in cumulative savings between 2019 and 2022."

(a) Please confirm that the cumulate savings referred to pertain to: (i) the value of energy, not capacity or ancillary services; (ii) ratepayers in the Rhode Island load zone, not rest of pool; and (iii) the ISO-NE Capacity Commitment Periods 10, 11 and 12.

(b) Explain in detail how the \$280 million figure was derived, and provide all work-papers used in the calculations.

(c) Identify all inputs into these calculations derived from outside sources, and identify the outside source(s).

(d) For all inputs that were not derived from outside sources (that is, assumptions made by Invenergy), identify the assumption and explain why Invenergy believes the assumption to be reasonable.

(e) Identify the principal person(s) responsible for this calculation.

(f) Identify additional person(s) involved in this calculation and generally the role of each one.

1.4. This Data Request pertains to PowerPoint Slide 24 used by Invenergy at the January 12, 2016 Preliminary Hearing, specifically the figure of ratepayer savings of \$258 million in cumulative savings between 2019 and 2022.

(a) Please confirm that the cumulate savings referred to pertain to: (i) capacity payments, not energy or ancillary services; (ii) ratepayers in the Rhode Island load zone, not rest of pool; and (iii) the ISO-NE Capacity Commitment Periods 10, 11 and 12.

(b) Explain in detail how the \$258 million figure was derived, and provide all work-papers used in the calculations.

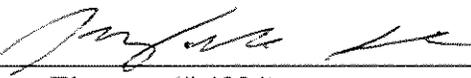
(c) Identify all inputs into these calculations derived from outside sources, and identify the outside source(s).

(d) For all inputs that were not derived from outside sources (that is, assumptions made by Invenergy), identify the assumption and explain why Invenergy believes the assumption to be reasonable.

(e) Identify the principal person(s) responsible for this calculation.

(f) Identify additional person(s) involved in this calculation and generally the role of each one.

CONSERVATION LAW FOUNDATION,
by its Attorneys,



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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, 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 January 13, 2016. In addition, pursuant to the instructions of the EFSB Coordinator at the January 12, 2016 Preliminary Hearing, CLF is willing to provide hard-copy service to any party who requests that.

