STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC

APPLICATION TO CONSTRUCT AND

OPERATE THE CLEAR RIVER ENERGY : SB-2015-06

CENTER, BURRILLVILLE, RHODE ISLAND

INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S THIRD SET OF DATA REQUESTS

3-1: Please set forth in detail Invenergy's plans to decommission the Clear

River Energy Center, including Invenergy's proposal for fully funding the entire decommissioning process, including, but not limited to, any

costs associated with clean up of any hazardous wastes.

RESPONSE 3-1: Invenergy Thermal Development LLC ("Invenergy") is prepared to

enter into a Decommissioning Agreement between the Clear River Energy Center Project and the Town of Burrillville ("the Town"). The Agreement will include dismantlement and other decommissioning activities. Invenergy will prepare a draft copy for the Town's review.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: April 26, 2016

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3-2: Please explain what alternatives, other than the ones provided in the

filing that relate to alternative energy options and no action, the

company has considered relating to siting options throughout southern

New England for this facility, including the criteria utilized for

eliminating these other alternative sites that led to the selection of the

Clear River site.

RESPONSE 3-2: Please see the pre-file testimony of John Niland filed with the Public

Utilities Commission ("PUC") on April 22, 2016 discussing the alternative technologies considered. Regarding alternative sites,

Invenergy investigated several sites in the SEMA/RI zone using criteria for sites or areas that have both existing gas and electric infrastructure and proper zoning that could support a project of the type proposed. Invenergy identified several areas that had potential, but those areas were eliminated due to insufficient gas pipeline capacity, insufficient electric transmission capacity or inadequate zoning. The Clear River Energy Center site was selected because it has all the necessary key

attributes.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: April 26, 2016

INVENERGY THERMAL DEVELOPMENT LLC By its Attorneys,

/s/ Alan M. Shoer

Alan M. Shoer, Esq. (#3248) Richard R. Beretta, Jr. Esq. (#4313) Nicole M. Verdi, Esq. (#9370) ADLER POLLOCK & SHEEHAN, P.C. One Citizens Plaza, 8th Floor Providence, RI 02903-1345

Tel: 401-274-7200 Fax: 401-751-0604 Dated: April 26, 2016

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2016, I delivered a true copy of the foregoing responses to the Energy Facilities Siting Board via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer