

**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
CONSERVATION LAW FOUNDATION’S SIXTH SET OF DATA REQUESTS
(Received July 6, 2016)**

natural gas in the duct-fired state, the CO₂ emissions rate, in lbs/MWh, is expected to be approximately 765 lbs/MWh during the summer and approximately 757 lbs/MWh during the non-summer months. The facility cannot operate in a duct-fired state when burning ULSD, thus there is no applicable CO₂ emissions rate, in lbs/MWh, for this operating state.

4. In order to calculate Clear River’s expected CO₂ emissions rate, in lbs/MWh, (and overall CO₂ emissions impact, in short tons) PA performed an hourly chronological dispatch for Clear River, factoring in the underlying natural gas CO₂ emissions rate, in lbs/MMBtu, of 116.9 lbs/MMBtu (PA Consulting’s (“PA”) analysis did not assume any ULSD operations during the study period) and the various operating states (and underlying heat rates for each state’s operating efficiency) in which Clear River can dispatch. PA then aggregated these hourly numbers on an annual basis to arrive at an expected average annual CO₂ emissions rate of 760 lbs/MWh. The reason that this expected 760 lbs/MWh is lower than the quoted 765 lbs/MWh when the facility is operating in a duct-fired state during the summer months is because PA’s analysis does not expect the facility to always operate in the least efficient duct-fired state, as actual operations will be dictated by underlying market conditions (including significant operations in the base load operating state as well as times when the facility will cycle down to min load operating conditions), and the expectation that operation of the duct-fired state will occur, at times, outside of the summer months.

RESPONDENT: Michael Feinblatt, ESS Group
 Ryan Hardy, PA Consulting

DATE: July 20, 2016

INVENERGY THERMAL ENERGY LLC
By its Attorneys,

/s/ Alan M. Shoer

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Dated: July 20, 2016

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 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