

July 6, 2016

**Via Federal Express/Electronic Mail**

Todd Anthony Bianco, EFSB Coordinator  
RI Energy Facilities Siting Board  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: *Invenergy Docket No. SB-2015-06***

Dear Mr. Bianco:

On behalf of Invenergy Thermal Development LLC (“Invenergy”), enclosed please find an original and 10 copies of Invenergy’s Response to the Office of Energy Resources’ First Set of Data Requests in connection with the above docket.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER  
[ashoer@apslaw.com](mailto:ashoer@apslaw.com)

Enclosures

cc: Service List

**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 OFFICE OF ENERGY RESOURCES' FIRST SET OF DATA REQUESTS**

OER 1-1:                                Regarding Invenergy's November 9, 2015 Supplemental Filing with the Energy Facilities Siting Board in Docket No. SB 2015-06, please provide unredacted copies of the June 15, 2015 PA Member and the July 29, 2015 PA Memo. These Memos summarize the project's expected operations, and the expected reduction in wholesale capacity prices, respectively. If any calculations are supported by electronic spreadsheet files, please provide spreadsheets with all cell formulas and cell references intact.

RESPONSE 1-1:                        Please contact Invenergy Thermal Development LLC's ("Invenergy") attorney to obtain the unredacted materials requested pursuant to a nondisclosure agreement.

RESPONDENT:                         John Niland, Invenergy Thermal Development LLC

DATE:                                    July 6, 2016



RESPONSE 1-2: In response to request 1-2(g)(2), Invenenergy does not have the requested data. Its fundamental model is not currently set up to provide fuel usage aggregated by zone, so we do not have a readily accessible output summary to share at that level.

Regarding all other requests in 1-2 that relate to the confidential response to the DPUC Second Set of Data Requests, please contact Invenenergy's attorney to obtain the unredacted materials requested pursuant to a nondisclosure agreement.

RESPONDENT: John Niland, Invenenergy Thermal Development LLC

DATE: July 6, 2016

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD**

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**APPLICATION TO CONSTRUCT AND                :**  
**OPERATE THE CLEAR RIVER ENERGY                :**        **SB-2015-06**  
**CENTER, BURRILLVILLE, RHODE ISLAND                :**

**INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO  
THE OFFICE OF ENERGY RESOURCES' FIRST SET OF DATA REQUESTS**

OER 1-3:            Please provide an unredacted copy of "Confidential exhibit 1," which was provided in response to the DPUC's Third Set of Data Requests to Invenergy in PUC Docket No. 4609.

RESPONSE 1-3:    Please contact Invenergy's attorney to obtain the unredacted materials requested pursuant to a nondisclosure agreement.

RESPONDENT:       John Niland, Invenergy Thermal Development LLC

DATE:                July 6, 2016

INVENERGY THERMAL DEVELOPMENT LLC  
By its Attorneys,

/s/Alan M. Shoer

Alan M. Shoer, Esq. (#3248)  
Richard R. Beretta, Jr. Esq. (#4313)  
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Providence, RI 02903-1345  
Tel: 401-274-7200  
Fax: 401-751-0604  
Dated: July 6, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2016, I delivered a true copy of the foregoing responses to Office of Energy Resources' 1<sup>st</sup> Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

**Docket No. 4609 – PUC Advisory Opinion Regarding Need to Construct the Clear River Energy Facility  
Service List as of 6/15/16**

Name/Address	E-mail	Phone
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