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August 18, 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' Second Set of Data Requests and accompanying CD that includes the confidential attachments, in connection with the above docket.

Also, please find a Motion for a Protective Treatment of the confidential attachments.

Please let me know if you have any questions.

Very truly yours,

ALAN M. SHOEF ashoer@apslaw.com

Enclosures

cc: Service List

In re: Invenergy Thermal Development LLC : SB-2015-06

Application to Construct the Clear River

Energy Center in Burrillville, R.I. :

## MOTION OF INVENERGY THERMAL DEVELOPMENT LLC FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

Now comes Invenergy Thermal Development LLC ("Invenergy") and hereby requests that the Energy Facility Siting Board ("EFSB" or "the Board") grant protection from public disclosure certain confidential information submitted as attachments to Invenergy's Responses to the Office of Energy Resources' ("OER") Second Set of Data Requests.

The documents that are the subject of this Motion that require protective treatment from disclosure to the public are three excel files: (1) "Clear River – Market Assumption and Results – With Clear River"; (2) "Clear River – Market Assumptions and Results – Without Clear River"; and (3) "Clear River – Emissions Generation and Heat Input Results." Invenergy requests protective treatment of these documents in this proceeding in accordance with R.I. Gen. Laws § 38-2-2(4)(B). The Board has previously granted protective treatment of similar PA documents. See EFSB Order No. 82.

#### I. LEGAL STANDARD

Rhode Island's Access to Public Records Act ("APRA"), R.I. Gen. Laws § 38-2-1 et. seq., sets forth the parameters for public access to documents in the possession of state and local government agencies. Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2. Therefore, to the extent that information

1

provided to the Board falls within one of the designated exceptions to APRA, the Board has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

When interpreting APRA, the Rhode Island Supreme Court has held that the agencies making determinations as to the disclosure of information under APRA may apply the balancing test established by the Court in *Providence Journal v. Kane*, 577 A.2d 661 (R.I. 1990). Under this balancing test, the Board may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies. Further, where the release of information or data to a competitor will "cause substantial harm to the competitive position of the person from whom the information was obtained[,]" the Board should grant a request to protect the information from public disclosure. *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001).

Moreover, the Rhode Island Supreme Court has held that the agencies applying the balancing test established in *Providence Journal v. Kane*, 577 A.2d 661 (R.I.1990) may grant protection of the information even if the requested document does not fall within one of the twenty-five (25) enumerated exceptions in APRA, where the requested document may be subject to redaction upon an appropriate balancing test weighing the public interests in disclosure against the privacy interests of the affected individual. *See Direct Action for Rights and Equality v.* 

Gannon (DARE I), 713 A.2d 218 (R.I. 1998) (see also DARE (II), 819 A.2d 651 (R.I. 2003)); Providence Journal Company v. Kane, 577 A.2d 661 (R.I. 1990).

#### II. BASIS FOR CONFIDENTIALITY REQUEST

In order to respond to the OER's data requests, Invenergy's consultants, PA Consulting Inc. ("PA") prepared this data. This information is not generally available to the public. Providing the details of PA's market assumptions, financial analysis and emissions data in a public filing would cause Invenergy "substantial harm to the competitive position" of the Company. See Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001). The detailed market data and modeling details referenced in these documents should therefore be protected under the trade secret and commercial information exception, as authorized at R.I. Gen. Laws § 38-2-2(4). Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001).

For the reasons stated above, this information should be exempt from the definition of a public record under APRA as ". . . commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature." R.I. Gen. Laws § 38-2-2(4)(B). The EFSB should determine that the data provided in regards to these spreadsheets is confidential and provide protective treatment for this information by granting this Motion for a Protective Order, pursuant to R.I. Gen. Laws § 38-2-2. Invenergy respectfully requests that these documents identified herein (i) be kept confidential indefinitely, (ii) not be placed in the public docket, and (iii) be disclosed only to the EFSB, attorneys and expert consultants as necessary to this proceeding and in accordance with the protections ordered.

WHEREFORE, the Invenergy respectfully requests that the Board grant this Motion for Protective Treatment as stated herein.

Respectfully submitted, Invenergy Thermal Development LLC By its attorneys,

/s/ Alan M. Shoer

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Dated: August 18, 2016

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2016, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

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' SECOND SET OF DATA REQUESTS

OER 2-1:

Please provide the following information that was derived from the AURORAxmp model used to support Invenergy's claimed greenhouse gas impacts ascribable to the operation of the Clear River Energy Center ("CREC"). Provide all information in electronic spreadsheet format with all cell formats and cell references intact.

- (a) Provide the fuel use by type (including but not limited to natural gas, coal, distillate fuel oil, kerosene, jet fuel, residual fuel oil), for each year of the forecast, with and without CREC. The data should cover the same years for which Invenergy provided carbon dioxide emissions results, i.e., from 2019 through 2025. If available, provide the results by control area (ISO-NE, NYISO), or otherwise in the most granular aggregation possible.
- (b) If the fuel use data requested in (a) is not available for each year from 2019 through 2025, please explain why.
- (c) For each technology type listed below, provide the annual MWh of generation with and without CREC, for ISO-NE and NYISO.
  - (1) Combined cycle plants
  - (2) Combustion turbines
  - (3) Oil-fired steam plants
  - (4) Coal-fired plants
  - (5) Nuclear
  - (6) Wind
  - (7) Hydro (excluding pumped storage)
  - (8) Solar
  - (9) Imports
  - (10) Biomass, landfill gas
  - (11) Other
- (d) Provide the emissions of carbon dioxide for each control area or RTO across the study region, other than ISO-NE and NYISO, for each year of the forecast, with and without CREC.
- (e) Provide the total annual generation (MWh) for the Rhode Island zone

IN RE: INVENERGY THERMAL DEVELOPMENT LLC

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CENTER, BURRILLVILLE, RHODE ISLAND

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

#### **RESPONSE 2-1:**

- (a) Heat Input and generation are available from PA Consulting Inc.'s ("PA") modeling output by groups of unit types (e.g. coal, gas, oil etc.). Heat input results are provided in the included Excel file titled "Clear River Emissions Generation and Heat Input Results 08-17-2016" and attached hereto.
- (b) Fuel use data is provided as described in 2-1 (a) above.
- (c) Heat Input and generation are available from PA's modeling output by groups of unit types (e.g. coal, gas, oil etc.). Generation results are provided in the included Excel file titled "Clear River Emissions Generation and Heat Input Results 08-17-2016" and attached hereto.
- (d) Emissions results are available from PA output only for the target markets evaluated for the Clear River market projections (ISO-NE and NYISO). Note that the previous set of zonal emissions backup data provided contained a computational error in the presentation of zonal results, which has been corrected in the attached file.
- (e) Total generation for the Rhode Island Zone, both with and without Clear River Energy Center ("CREC"), are provided. Since the Rhode Island zone includes generators outside of the state of Rhode Island, Invenergy Thermal Development LLC ("Invenergy") has included a further breakdown of generation for plants inside and outside of the state of Rhode Island. Please see attachment titled "Clear River Emissions Generation and Heat Input Results 08-17-2016".

In addition, we have provided a 'RI CO2' emissions tab that provides PA's view of a consumption-based approach using Rhode Island state-specific load (i.e., load located physically within the state boundaries of Rhode Island) and a CO2 emission rate that is equivalent to the ISO-NE system average (inclusive of CO2 emissions from coal, natural gas and oil units against all MWh produced physically within the ISO-NE including those associated with renewables, nuclear, and hydro). The results

show that there is a net CO2 reduction with CREC, even with the CREC emissions included. This is a conservative approach given that CREC would likely only be displacing other fossil generation, which has a higher lb/MWh emission rate than the overall system wide average. My testimony includes the expected CO2 reductions on the system that reflects CREC's displacement of higher CO2-emitting resources, but we wanted to provide this example as well to reinforce the importance of a consumption-based approach to emission reductions.

RESPONDENT:

Ryan Hardy, PA Consulting, Inc.

DATE:

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' SECOND SET OF DATA REQUESTS

OER 2-2:

Were the Renewable Energy Standards ("RES"), Renewable Portfolio Standards ("RPS"), and similar clean energy targets applicable to each state within the model footprint reflected in the resource buildout of the AURORAxmp model? Please explain how the quantity and type of wind, solar, and other renewable resources added over the forecast period was determined within ISO-NE, NYISO, and the rest of the

model footprint.

**RESPONSE 2-2:** 

Yes. The analysis includes a representation of the Renewable Portfolio Standards/Renewable Energy Standards for each state within the modeled footprint. The specific renewable resource additions reflect PA's view of resource additions in the regions including consideration of individual state requirements, projected cost and output for renewable options, existing resource mix, announced resources, interconnection

requests, regional studies and other factors.

RESPONDENT:

Ryan Hardy, PA Consulting, Inc.

DATE:

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' SECOND SET OF DATA REQUESTS

OER 2-3:

Invenergy's response to OER's data request 1-2(e), provided on a worksheet titled "Supply-Demand," indicates that "Demand Side Resources" and "Imports/Exports" decrease in some years over the forecast, and increase in other years. Please explain how such increases

and decreases in these two supply types were determined.

**RESPONSE 2-3:** 

The changes in demand side resources and imports/exports through 2019 reflect cleared demand side resources and import/export capacity based on ISO-NE's Forward Capacity Auctions ("FCA"). Beyond 2019, demand side resource capacity is forecasted to increase based on PA's assumptions related to long-term demand side resource growth. Beyond 2019, import/export capacity is held constant based on the import/export capacity cleared in FCA 10, which had the highest cleared import/export capacity since ISO-NE transitioned to a downward-sloping demand

curve for the Rest-of-Pool.

RESPONDENT:

Ryan Hardy, PA Consulting, Inc.

DATE:

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' SECOND SET OF DATA REQUESTS

OER 2-4:

Invenergy's response to CLF DR 2-5(c) provided the number of megawatt-hours of energy that the plant would sell into the ISO-NE market for the first three years of operation for the 1x1 configuration from the January 2016 dispatch modeling. Please provide updated energy sales results for the technology configuration that was used in the dispatch model discussed in the pre-filed testimony of Ryan Hardy

in this docket (at p. 11-13.)

**RESPONSE 2-4:** 

Year	6/19-5/20	6/20-5/21	6/21-5/22
GWh	3,078	6,192	6,326

**RESPONDENT:** 

Ryan Hardy, PA Consulting, Inc.

DATE:

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' SECOND SET OF DATA REQUESTS

OER 2-5:

In Invenergy's response to OER's First Set of Data Requests, DR 1-2 (d) through (g), most of the AURORAxmp model input data and results were provided only for years 2019 through 2022. The carbon dioxide emissions data for ISO-NE and NYISO, however, was provided for years 2019 through 2025. Please provide data for years 2023 through 2025 for all of the same information requested in DR 1-2 (d) through (g). If this information is not available, please explain why, and explain how carbon dioxide emissions were modeled for 2023 through 2025 if the model did not extend through 2025.

RESPONSE 2-5:

Please see attachments titled "Clear River - Market Assumptions and Results - Without Clear River - 08-17-2016" and "Clear River - Market Assumptions and Results - With Clear River - Post FCA 10 - 08-17-2016.xlsx".

RESPONDENT:

Ryan Hardy, PA Consulting, Inc.

DATE:

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, 8<sup>th</sup> Floor Providence, RI 02903-1345

Tel: 401-274-7200 Fax: 401-751-0604 Dated: August 18, 2016

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2016, I delivered a true copy of the foregoing responses to Office of Energy Resources' Second Set of Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

### **ATTACHMENTS**

### **CONFIDENTIAL**

SB-2015-06 Invenergy CREC Service List as of 07/15/2016

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