

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**  
**ELEVENTH SET OF DATA REQUESTS DIRECTED TO INVENERGY**

Request 11-1. Please provide all correspondence between Invenergy and the ISO, including electronic and e-mail correspondence and electronic submissions, pertaining to or related to the ability or inability of Invenergy (Turbine One or Turbine Two or both) to meet the Critical Path Schedule milestone pertaining to major permits. See ISO Tariff Section III.13.1.1.2.2.2(a).

Request 11-2. Please provide all correspondence between Invenergy and the ISO, including electronic and e-mail correspondence and electronic submissions, pertaining to or related to the ability or inability of Invenergy (Turbine One or Turbine Two or both) to meet the Critical Path Schedule milestone pertaining to project financing. See ISO Tariff Section III.13.1.1.2.2.2(b).

Request 11-3. (a) Please provide all documents pertaining to or related to the ability or inability of Invenergy (Turbine One or Turbine Two or both) to meet the Critical Path Schedule milestone pertaining to major equipment orders. See ISO Tariff Section III.13.1.1.2.2.2(c).

(b) Please provide all correspondence between Invenergy and the ISO, including electronic and e-mail correspondence and electronic submissions, pertaining to or related to the ability or inability of Invenergy (Turbine One or Turbine Two or both) to meet the Critical Path Schedule milestone pertaining to major equipment orders.

(c) When does Invenergy expect to place its order for Turbine One? Please state the facts upon which this expectation is based.

(d) When does Invenergy expect to place its order for Turbine Two? Please state the facts upon which this expectation is based.

Request 11-4. This question pertains to Invenergy's current plan with respect to interconnecting with the ISO-run electricity grid.

(a) Does Invenergy plan or intend to interconnect a single turbine to the grid, either as a first step toward connecting two turbines or as a final plan?

(b) If the answer to part (a) was yes, has an Interconnection Feasibility Study been requested on the one-turbine interconnection proposal? See ISO Tariff, Schedule 22, Section 6. On what date was it requested? On what date was it completed?

(c) If the answer to part (a) was yes, has an Interconnection Impact Study been requested on the one-turbine interconnection proposal? See ISO Tariff, Schedule 22, Section 7. On what date was it requested? On what date was it completed?

(d) Does Invenegy plan or intend to have its initial interconnection to the grid be of two turbines?

(e) If the answer to part (d) was yes, has an Interconnection Feasibility Study been requested on the two-turbine interconnection proposal? On what date was it requested? On what date was it completed?

(f) If the answer to part (d) was yes, has an Interconnection Impact Study been requested on the two-turbine interconnection proposal? On what date was it requested? On what date was it completed?

Request 11-5. Please identify all sites, including but not limited to surface water reservoirs, groundwater reservoirs, and individual wells, from which Invenegy could obtain cooling water for the project under its current water plan? In providing this information, please include all primary and contingent sources of water Invenegy could obtain from the Town of Johnston, the City of Fall River, the Narragansett Indian Tribe, Benn Water & Heavy Transport Corp., and any other entity that has a contract or other agreement with Invenegy or with Benn Water & Heavy Transport Corp. to supply the project.

Request 11-6. What is the legal name of the entity which participated in FCA-10 and obtained a CSO of 485 MW?

Request 11-7. (a) What is the legal name of the entity which satisfies the ISO's requirement pertaining to Site Control? See ISO Tariff, Section III.13.1.1.2.2.1.

(b) Please produce all documents that relate or pertain to Invenegy's having Site Control.

Request 11-8. What is the legal name of the entity which was the recipient of the September 29, 2017 New Capacity Qualification Determination Notice (QDN) from the ISO, which QDN was initialed by Carissa Sedlacek?

Request 11-9. Does any Invenegy-affiliated entity currently have pending any applications at the R.I. Department of Environmental Management for any permits pertaining to wetlands or wetlands alterations? If yes, what is/are the legal name(s) of those entity(ies)?

Request 11-10. Does any Invenegy-affiliated entity currently have pending any applications at the R.I. Department of Environmental Management for any permits pursuant to the Clean Air Act? If yes, what is/are the legal name(s) of those entity(ies)?

Request 11-11. Does any Invenenergy-affiliated entity currently have pending any applications at the Army Corps of Engineers for any permits pertaining to the proposed Burrillville facility? If yes, what is/are the legal name(s) of those entity(ies)?

CONSERVATION LAW FOUNDATION,  
by its Attorneys,



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CERTIFICATE OF SERVICE

I certify that the original and three copies of this Data Request were mailed to the Energy Facility Siting Board by first class mail, postage prepaid. In addition, PDF 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 December 4, 2017.

