

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
TWELFTH SET OF DATA REQUESTS DIRECTED TO INVENERGY**

Request 12-1. Reference is made to ¶ 19 (page 5) of the Affidavit of Kevin C. Reardon in FERC Docket ER 18-349, pertaining to Invenergy's Interconnection Agreement. Please provide all the "numerous communications between September and November 2017" between Invenergy and National Grid, including all e-mails, that are referenced.

Request 12-2. This request is continuing, and should be answered within three business days of receiving the referenced notification from ISO-NE. If/when Invenergy receives notification from ISO-NE that ISO-NE has invoked the provisions of Tariff Section III.13.3.4(c) to involuntarily terminate Invenergy's 485 MW CSO on Turbine One: (a) please produce the entire notification document, including all pages, and all appendices; and (b) please produce all correspondence between ISO-NE and Invenergy related to that notification.

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 hand delivered to the Energy Facility Siting Board. 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 12, 2017.

