

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
TENTH SET OF DATA REQUESTS DIRECTED TO INVENERGY

Request 10-1. Please produce all correspondence, including electronic correspondence, between Invenergy and the ISO regarding Invenergy's qualification or disqualification from FCA-12, including the complete QDN, including the Appendix.

Request 10-2. Please produce Invenergy's New Capacity Show of Interest Form for FCA-12 (ISO Tariff Section III.13.1.1.2.1).

Request 10-3. Please produce all documents that support the statement in John Niland's November 1, 2017 letter to the EFSB (p. 1, ¶ 3) that "Invenergy's inability to participate in FCA 12 does not have an impact on CREC's ability to participate in future FCA's (e.g. FCA 13 or beyond). Invenergy's future participation was confirmed by ISO-NE."

Request 10-4. This Request pertains to the current status of each of Invenergy's two turbines in the ISO's Interconnection Queue (ISO Tariff Schedule 22, Large Generator Interconnection Procedures).

(a) What is the Interconnection Request Queue Position of each one of Invenergy's two proposed turbines?

(b) Has either turbine changed position in the Queue due to a Material Modification in its Interconnection Request (Schedule 22, Section 4.4)?

(c) If yes, please explain fully and provide copies of all the relevant documents, including electronic communications.

Request 10-5. Has Invenergy been informed by the ISO that Invenergy must perform a new (or supplemental) Interconnection Study due to a determination of a Material Modification having been made to its Interconnection Request? If yes, please provide all communications (including electronic) between Invenergy and the ISO on this subject.

Request 10-6. Please produce Invenergy's Interconnection Request (Schedule 22, Appendix 1) and all non-identical filings of Interconnection Request(s).

Request 10-7. Has Invenergy filed any monthly progress report forms with the ISO (ISO Tariff Section III.13.3.3). If yes, please produce them. This Data Request is continuing, and CLF requests copies of future filings when those are made.

Request 10-8. This question pertains to the following statement in John Niland's November 20, 2017 testimony [page 3, lines 2-3]: "This could lead to added system impacts, which may result in higher costs for CREC."

(a) What "added system impacts" are being referred to?

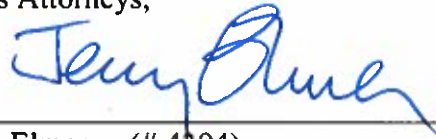
(b) Please list each "higher cost" that may result from these system impacts, and explain how and why these higher costs could result.

(c) Please state the dollar amount of "higher costs" for each of costs listed in response to Subpart (b) of this question. (Providing a range of likely cost increases in each case is acceptable.)

Request 10-9. Please provide copies of all correspondence between Invenergy and GE pertaining to major equipment purchase dates.

Request 10-10. Please provide all contracts, agreements, or letters of intent (including non-binding letters of intent) related to or pertaining to water for Invenergy, regardless of whether or not Invenergy is technically a signatory to the agreement or contract.

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 November 28, 2017.

A handwritten signature in blue ink is written over a horizontal line. The signature is cursive and appears to read "Jung".