

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
FOURTEENTH SET OF DATA REQUESTS DIRECTED TO INVENERGY

Request 14-1. This Data Requests pertains to Invenergy's November 17, 2017 FERC Complaint FERC, EL18-31, page 4, footnote 11. (a) Please produce a copy of the "separate agreement between Clear River and Eversource." (b) If that agreement is the subject of any litigation in any forum, please identify the parties to the litigation, the forum in which it is pending, and the proceeding, case, or docket number.

Request 14-2. This Data Request pertains to the November 14, 2017 (9:48 AM) e-mail from Kris Zadlo, Invenergy's Senior Vice President to the ISO, the paragraph numbered (1). Please explain in detail how the security amounts "as high as \$36 million, and possibly up to \$88 million" were derived. For every component of these amounts, please identify the relevant section(s) of the ISO Tariff.

Request 14-3. Please provide the ISO's September 25, 2015 QDN to Invenergy for FCA-10. This refers to the entire document, including all the pages and all the appendices, not a partial document.

Request 14-4. Did Invenergy receive a QDN for FCA-11? If yes, please provide the entire document.

Request 14-5. (a) Does Invenergy believe that it remains possible for it to have a Commercial Operation Date of May 31, 2021 (or June 1, 2021) given the failure to sign the LGIA by December 1, 2017. (b) If yes, set forth in detail the basis of this belief, and explain specifically how this could be possible in light of the missed LGIA deadline and ISO Tariff requirements pertaining to sequential scheduling of a project's In-Service Date, Initial Synchronization Date, and Commercial Operation Date. (c) If your answer to sub-part (a) was no, please state the currently hoped-for Commercial Operation Date.

Request 14-6. Please provide the Interconnection Feasibility Study provided to Invenergy by the ISO on August 11, 2015. This refers to the entire document, including all the pages and appendices, not a partial document.

Request 14-7. Please provide the System Impact Study provided to Invenergy by the ISO on March 2, 2016. This refers to the entire document.

CONSERVATION LAW FOUNDATION,
by its Attorneys,



Jerry Elmer (# 4394)

Max Greene (# 7921)

CONSERVATION LAW FOUNDATION

235 Promenade Street, Suite 560

Mailbox 28

Providence, RI 02908

Telephone: (401) 228-1904 (direct)

E-Mail: JElmer@CLF.org

E-Mail: MGreene@CLF.org

CERTIFICATE OF SERVICE

I certify that the original and three copies of this Data Request were mailed 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 25, 2017.

