



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**Department of Administration**

DIVISION OF LEGAL SERVICES

One Capitol Hill, 4<sup>th</sup> Floor  
Providence, RI 02908-5890

Tel: (401) 222-8880

Fax: (401) 222-8244

**Jennifer Sternick, Esq.**  
**Chief of Legal Services**

December 20, 2017

Alan M. Shoer, Esq.  
Adler, Pollock & Sheehan, P.C.  
One Citizens Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903

VIA ELECTRONIC MAIL

Re: Invenergy Thermal Development LLC/Clean River Energy Center Application, EFSB  
Docket No. SB-2015-06

Dear Attorney Shoer:

I am forwarding the following data request from Statewide Planning:

The Department of Administration, Division of Planning requests an update to the data that was previously requested on March 21, 2017 and March 29, 2017 and provided by Alder, Pollock, and Sheehan, P.C. in April, June, and November, 2017, including the data provided in Exhibit A and Exhibit B.

This update should account for any changes to the CREC project that are not reflected in that data. This may include changes to the CREC project size or design, construction/operational phase timelines, generation capacity, water plan, interconnection project, Invenergy's withdrawal of participation from the February 2018 ISO energy auction, or any other elements impacting the construction and operation of the CREC. The Division of Planning requests that the updated data include all of the inputs that were used in the input-output modelling described in section 5 of the application for both the IMPLAN and the JEDI models. The Division of Planning also requests an update to the project cost data, including the project costs by category and the share of each of these cost categories that will go to in-state vs. out-of-state firms.

This update should also include an update to the analyses provided in Sections 4.0 and 5.0 of Invenergy's Filing and Supplemental Filing, which was updated in April, June and November of 2017, including the economic and employment analyses. This update should reflect the new project plan, and should include calculations of Rhode Island employment, earnings, and economic output effects. It should also include an update to the information provided by PA

Consulting Group, Inc. in a memo dated November 4, 2015 and updated in June 2017 that separates the direct and indirect Rhode Island employment and earnings impacts. Finally, it should note any changes to the underlying assumptions or methodology of the analyses that were used to account for changes to the CREC project.

Sincerely,

/s/ Jennifer S. Sternick  
Jennifer S. Sternick

Cc: Kevin Nelson  
Erik Godwin  
EFSB Service List