

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

**INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO
THE TOWN OF BURRILLVILLE'S 43rd SET OF DATA REQUESTS**

Clear River Energy Center LLC (CREC) has filed a Complaint at FERC relating to charges that the Tariff allows to be imposed on interconnection customers and that Invenergy is requesting FERC to modify.

Request 43-1 In regard to this complaint, CREC estimates it will be required to pay approximately \$4.1 million each year for O&M Costs. Please provide the calculations CREC used to estimate the \$4.1 million.

Response 43-1 On January 23, 2018, CREC filed at FERC a notice of withdrawal of its DAF Complaint in FERC, Docket No. EL18-31-000. Nonetheless, in order to be responsive to this Request, and to provide a better understanding of this issue it concerns, CREC offers the following;

NGrid's DAF charge that CREC would pay does not track the actual O&M Costs associated with the specific existing equipment, nor will it be based on the actual O&M Costs associated with the specific upgraded equipment for which the ratepayers are currently paying.

Instead, the calculation of the DAF charge assumes that the O&M Costs associated with all new equipment (Network Upgrades) will reflect the average O&M Costs that National Grid experiences for its entire transmission system. NGrid performs an annual evaluation to determine the Annual Facilities Charges for Transmission Facilities. The Annual Facilities Charge in 2015 is 6.84% (the "DAF Rate"), and that is the figure that NGrid provided to CREC as an estimate for the DAF Rate that would apply to the cost of Network Upgrades funded by CREC).

The determination of Annual Facilities Charges for Transmission Facilities is calculated in association with Schedule 21-NEP , Attachment DAF of the ISO New England Tariff (http://www.iso-ne.com/static-assets/documents/regulatory/tariff/sect_2/sch21/sch_21_nep.pdf). The DAF Rate is derived by dividing NGrid's total system O&M Costs by NGrid's total system transmission Gross Plant Investment ("Book Value"). The DAF Rate is then applied to the Book Value of the Network. Gross Plant Investment relates to the Interconnecting Transmission Owner's Network Transmission Facilities; i.e., to the facilities and equipment owned, controlled, or operated by National Grid. The calculation of the O&M charge is outlined in the below table:

Network	Total	
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Transmission System Upgrade	Costs	DAF
Component		6.84%
S171N-1	\$543,000	\$37,141
T172N-1	\$510,000	\$34,884
175T	\$13,763,000	\$941,389
174T	\$13,763,000	\$941,389
K189	\$901,000	\$61,628
G185N	\$1,485,000	\$101,574
R9	\$6,564,000	\$448,978
H17	\$5,584,000	\$381,946
P11/R9 bus tie	\$485,000	\$33,174
Sherman road station expansion	\$6,203,693.00	\$424,332.60
line 341	\$6,757,447.00	\$462,209.37
line 347	\$3,569,681.00	\$244,166.18
line 328	\$573,107.00	\$39,200.52
Total	\$60,701,928	\$4,152,012

RESPONDENT:

Kris Zadlo, Invenergy Thermal Development LLC

DATE:

February 2, 2018

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Request 43-2 If CREC is relieved by FERC of paying the O&M Costs, will the ratepayers be required to pay these or similar O&M Costs?

(a) If yes, provide the estimate of the amount ratepayers will be required to pay per year.

Response 43-2 As noted in Response 43-1, a notice of withdrawal of the DAF Complaint was filed at FERC, Docket No. EL18-31-000, on January 23, 2018. Nonetheless, in order to be responsive to this Request, and to provide a better understanding of the issue it concerns, CREC offers the following;

No, Rhode Island ratepayers would not have to pay costs that are similar to those that CREC would be charged under the DAF. The ratepayers are currently paying the O&M costs on the facilities and components that would be upgraded/replaced if CREC goes forward. As we understand it, NGrid determines their overall O&M Costs associated with their Network System and these costs are pooled together with all O&M costs associated with all ISO New England Network Facilities. The total O&M costs for ISO NE are then re-allocated to each transmission owner on the basis of that utility's percentage of total network load. Based on load data posted by ISO-NE for 2016 (available at Regional Network Load Cost Report:<https://www.iso-ne.com/markets-operations/market-performance/load-costs#related-documents>), Narragansett represents about 6.4% of the total RNS load and so the allocation of the O&M costs for the CREC upgrades would be approximately 6.4% of the actual O&M costs incurred.

If FERC had granted the CREC Complaint, O&M Costs associated with Network Upgrades, to be constructed by NGrid, and paid for by CREC pursuant to the CREC Large Generator Interconnection Agreement ("LGIA") would be recovered from all Regional Network Service ("RNS") transmission customers (as they currently are). Almost all of these upgrades, (with the exception of the new switchgear to be located in the Sherman Road substation) involve the relocation or replacement of existing network facilities for which O&M Costs already are being paid by ratepayers. As such, because the upgrades themselves will be funded entirely by CREC, and because ratepayers would continue to pay for the O&M on these facilities as they are already, even if CREC had been successful at FERC, Rhode Island ratepayers would have ended up with new and/or improved equipment and a more reliable electric transmission network, at no appreciable cost.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

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DATE: January 23, 2018

Request 43-3 If ratepayers are required to pay higher O&M Costs, provide the impact these additional costs will have on the ratepayer savings CREC estimated in its most recent filing with the RI EFSB.

Response 43-3 As already noted, CREC has withdrawn the DAF Complaint it filed in FERC Docket No. EL18-31-000. With that said, as also stated above, the ratepayers are currently paying the O&M Costs on the network facilities associated with the Network Upgrades that were the subject of the Complaint proceeding. Invenergy does not know how much is currently being paid for the O&M associated with these specific facilities. However, as pointed out above, the costs going forward would have likely been lower than the costs that ratepayers presently are paying (assuming there would be any), given that the new equipment to be installed would not need the same amount of maintenance.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: February 2, 2018

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Request 43-4 Provide all the calculations used to determine the additional cost to ratepayers of Invenergy being relieved of its obligation to pay the O&M Costs associated with the CREC network upgrades.

Response 43-4 A withdrawal of the DAF Complaint was filed at FERC, Docket No. EL18-31-000, on January 23, 2018. That said, when looking solely at O&M, we do not believe there would have been any additional cost to ratepayers if Invenergy had been relieved of its obligation to pay the O&M Costs associated with the CREC network upgrades.

The actual O&M costs that ratepayers are currently paying on the existing equipment could have been reduced because brand new equipment will be installed and the added O&M costs associated with the new switchgear to be located in the Sherman Road substation should be offset by the expected reductions associated with the upgrades.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: February 2, 2018

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Request 43-5 Has CREC provided National Grid with a notice to proceed with procurement for long-lead and major material?

(a) If so, when was the notice to proceed provided to National Grid?

(b) If no notice to proceed was provided, provide the anticipated new in-service/commercial operation date for CREC Units 1 and 2.

Response 43-5 Invenergy has not provided National Grid with a notice to proceed with procurement for long-lead and major material.

(a) based on the decision by the FERC we are working with National Grid to determine when the notice can be provided in order to ensure that the current in-service date is met.

(b) Our in-service date has not changed – it is June 1, 2021 for CREC Unit 1 and June 1, 2022 for CREC Unit 2. Now that the FERC has issued its decision, the notice to proceed and the schedule milestones that were included in the filing the LGIA unexecuted at the FERC, we are working with National Grid to determine what dates need to be changed in order to ensure that the current in-service date is met.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: February 2, 2018

Respectfully submitted,

Invenergy Thermal Development LLC
By their attorneys,



W. Mark Russo (#3937)

FERRUCCI RUSSO P.C.

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Providence, RI 02903

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Dated: February 2, 2018

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2018, I delivered a true copy of the foregoing responses to the **TOWN OF BURRILLVILLE'S 43rd SET OF DATA REQUESTS** via electronic mail to the parties on the attached service list.

/s/



SB-2015-06 Invenergy CREC Service List as of 01/10/2018

Name/Address	E-mail	Phone/FAX
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<p>Entities with Pending Intervention (Electronic Service Only)</p>		

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