

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
CONSERVATION LAW FOUNDATION'S TWELFTH SET OF DATA REQUESTS**

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.

RESPONSE 12-1 Please see the **Exhibit 42-11(a) (Confidential)** attached to the Town of Burrillville's 42nd Set of Data Requests.¹

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: January 9, 2018

¹Please note that Exhibit 42-11(a) contains critical energy/electricity infrastructure information ("CEII") which is protected under federal law. Please see the Motion for Protective Treatment, filed concurrently with these data responses. Invenergy will file one (1) copy of Exhibit 42-11(a) under seal with the Board. Until the attorneys and expert consultants that will be reviewing this information have signed request forms and non-disclosure agreements and received confirmation from National Grid and ISO-NE, Invenergy is not at liberty to disclose the CEII information contained in Exhibit 42-11(a).

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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.

RESPONSE 12-2 No notice has been received.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: January 9, 2018

INVENERGY THERMAL DEVELOPMENT LLC
By its Attorneys,

/s/ Alan M. Shoer

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Dated: January 9, 2018

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2018, I delivered a true copy of the foregoing responses to the Conservation Law Foundation's Twelfth Set of Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer