

January 12, 2018

Via Federal Express/Electronic Mail

Todd Anthony Bianco, PhD, EFSB Coordinator
RI Energy Facilities Siting Board
89 Jefferson Blvd.
Warwick, RI 02888

Re: Invenergy Docket No. SB-2015-06

Dear Dr. Bianco:

On behalf of Invenergy Thermal Development LLC and the Clear River Energy Center Project (“Invenergy”), enclosed please find an original and three (3) copies of the Redacted Version of Invenergy’s Responses to the Conservation Law Foundation’s (“CLF’s”) 14th Set of Data Requests and Redacted Version of Exhibits.

Additionally, enclosed please find one confidential copy of the Confidential Version of Exhibits 14-3 and 14-4 to Invenergy’s Responses to the CLF’s 14th Set of Data Requests.¹ A copy of these confidential documents will be transmitted to those parties that have signed Non-Disclosure Agreements with Invenergy.

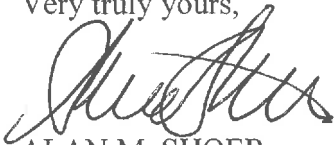
Lastly, also enclosed is a Confidential Version – *Filed Under Seal with the Board* – of Exhibits 14-6 and 14-7.²

Please let me know if you have any questions.

¹ Exhibits 14-3 and 14-4 attach ISO-NE’s QDN for FCA-10 and FCA-11. On December 12, 2017, the Energy Facility Siting Board previously granted Invenergy’s Motion for Protective Treatment of the information contained in ISO-NE’s QDN for FCA-12. Accordingly, for the same reasons the Board ruled to protect the information contained in ISO-NE’s FCA-12 QDN, these Exhibits are confidential and should be protected under the Board’s oral order, rendered on December 12, 2017.

² As discussed in the Motion for Protective Treatment filed with the Board on January 9, 2018, Exhibits 14-6 and 14-7 contain critical energy/electricity infrastructure information (“CEII”) which is protected under federal law. Invenergy will file one (1) copy of Exhibits 14-6 and 14-7 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 from National Grid and ISO-NE, Invenergy is not at liberty to disclose the CEII information contained in Exhibits 14-6 and 14-7.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alan M. Shoer', written in a cursive style.

ALAN M. SHOER

ashoer@apslaw.com

Enclosures

cc: Service List

**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 FOURTEENTH SET OF DATA REQUESTS**

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.

RESPONSE 14-1 (a) No final agreement exists at this time.

 (b) N/A

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

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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.

RESPONSE 14-2 The security amounts were taken from Exhibit B1 of the LGIA.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

DATE: January 12, 2018

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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.

RESPONSE 14-3 Please see **Exhibit 14-3 (Confidential)**.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: January 12, 2018

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

RESPONSE 14-4 Yes. Please see **Exhibit 14-4 (Confidential)**.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: January 12, 2018

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**INVENERGY THERMAL DEVELOPMENT LLC's RESPONSES TO
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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.

RESPONSE 14-5 (a) Yes, Invenergy believes that it remains possible for it to have a Commercial Operation Date of May 31, 2021.

(b) Invenergy is an experienced developer and builder of energy infrastructure. Specifically, over the last 17 years, Invenergy has developed, built and/or owns and operates 400 miles of transmission, 55 high voltage substations and over 16,000MW of solar, storage, thermal and wind facilities. Invenergy's own construction experience and experience working with other utilities in the US and internationally, suggests that the work identified in the LGIA can be constructed typically in 24-30 months.

RESPONDENT: Kris Zadlo, Invenergy Thermal Development LLC

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**INVENERGY THERMAL DEVELOPMENT LLC’S RESPONSES TO
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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.

RESPONSE 14-6 Please see **Exhibit 14-6 (Confidential)**. This exhibit contains critical energy/electricity infrastructure information (“CEII”) which is protected under federal law. Please see the Motion for Protective Treatment, filed on January 9, 2018. Invenergy will file one (1) copy of Exhibit 14-6 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 14-6.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

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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.

RESPONSE 14-7 There are two System Impact Studies: (1) Steady-State System Impact Study Report and (2) the Stability System Impact Study Report. Both studies are attached as **Exhibit 14-7 (Confidential)**. This exhibit contains critical energy/electricity infrastructure information ("CEII") which is protected under federal law. Please see the Motion for Protective Treatment, filed on January 9, 2018. Invenergy will file one (1) copy of Exhibit 14-7 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 14-7.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: January 12, 2018

INVENERGY THERMAL DEVELOPMENT LLC
By its Attorneys,

/s/ Alan M. Shoer

Alan M. Shoer, Esq. (#3248)
Richard R. Beretta, Jr. Esq. (#4313)
Nicole M. Verdi, Esq. (#9370)
ADLER POLLOCK & SHEEHAN, P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
Tel: 401-274-7200
Fax: 401-751-0604
Dated: January 12, 2018

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2018, I delivered a true copy of the foregoing responses to the **CONSERVATION LAW FOUNDATION'S FOURTEENTH SET OF DATA REQUESTS** via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer