

Invenergy

December 1, 2017

Via Federal Express

RI Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Re: *Invenergy Thermal Development LLC's Application to Construct and Operate the Clear River Energy Center in Burrillville, Rhode Island*
Docket No. SB-2015-16

Dear Members of the Rhode Island Energy Facility Siting Board:

Invenergy Thermal Development LLC and the Clear River Energy Center Project (“Invenergy”) has been conducting negotiations with the New England Power Company, (“National Grid”, or “NGrid”) and the ISO New England (“ISO-NE”) on our Large Generator Interconnection Agreement (LGIA) over the past eleven months. The purpose of this letter is to advise the EFSB of recent developments and to address several comments that were made by CLF and the Town of Burrillville during the hearing held on Monday November 27, 2017, where it was stated that Invenergy had “failed to reach agreement with National Grid”, on the LGIA and Invenergy had “failed to post the required credit” under the LGIA.

It must be pointed out at the outset that, like other processes, the LGIA process is a separate and distinct matter not directly related to the matters currently before the Board. With that said, and as noted above, Invenergy and National Grid, after negotiating the LGIA for almost a year, reached agreement on all but a few issues. Accordingly, as required, by Section 11.2 (Negotiation) of Schedule 22 Large Generator Interconnection Procedures of the Tariff, on November 29, 2017, ISO-NE filed the LGIA with the Federal Energy Regulatory Commission (FERC) so that the FERC can resolve those issues. The filing can be found at https://www.iso-ne.com/static-assets/documents/2017/11/public_filing_clear_river_lgia.pdf. FERC is expected to issue an order within 60 days after filing setting forth its determination with respect to the areas of disagreement. Once FERC issues its order, the credit posting required for design and procurement activities under the LGIA would be posted by Invenergy in accordance with that disposition.

Separate from the LGIA process is a complaint filed at the FERC related to charges the Tariff allows to be imposed on interconnection customers and that Invenergy is requesting FERC to modify. This complaint can be found on-line at <http://www.ferc.gov>, using the “eLibrary” link 20171120-3017 FERC PDF (Unofficial) 11/20/2017. The overriding timing issue, however, relates to the timing of Invenergy’s obligation to authorize National Grid to proceed on detail design and procurement and post security in the tens of millions of dollars prior to our having obtained any necessary state siting permits. Invenergy will continue to diligently pursue all the activities required to obtain the necessary permits in a timely manner.

Inverenergy wanted to provide this update as soon as possible once ISO-NE filed the LGIA with the FERC.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John Niland".

John Niland
Director Business Development