

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD**

**IN RE: INVENERGY THERMAL DEVELOPMENT LLC :
 APPLICATION TO CONSTRUCT AND :
 OPERATE THE CLEAR RIVER ENERGY : SB-2015-06
 CENTER, BURRILLVILLE, RHODE ISLAND :**

**INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO
CONSERVATION LAW FOUNDATION'S THIRD SET OF DATA REQUESTS**

3-1. How many megawatts was Invenergy qualified by ISO-NE to bid into FCA-10?

RESPONSE 3-1: We were qualified to bid up to ■■■ MW.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: April 26, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC :
APPLICATION TO CONSTRUCT AND :
OPERATE THE CLEAR RIVER ENERGY : SB-2015-06
CENTER, BURRILLVILLE, RHODE ISLAND :

INVENERGY THERMAL DEVELOPMENT LLC's RESPONSES TO
CONSERVATION LAW FOUNDATION'S THIRD SET OF DATA REQUESTS

3-2. How many megawatts did Invenergy bid into each round of FCA-10?

RESPONSE 3-2: ■■■ MW for all rounds and the last round we added a separate price quantity pair of ■■■ MW ■■■■■.

RESPONDENT: John Niland, Invenergy Thermal Development LLC

DATE: April 26, 2016

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD**

IN RE: **INVENERGY THERMAL DEVELOPMENT LLC :**
 APPLICATION TO CONSTRUCT AND :
 OPERATE THE CLEAR RIVER ENERGY : **SB-2015-06**
 CENTER, BURRILLVILLE, RHODE ISLAND :

**INVENERGY THERMAL DEVELOPMENT LLC's RESPONSES TO
CONSERVATION LAW FOUNDATION'S THIRD SET OF DATA REQUESTS**

3-3. This question pertains to Invenergy's estimate of ratepayer impacts just for Rhode Island ratepayers, just in the capacity market, that appears in Invenergy's January 12, 2016 PowerPoint presentation to the EFSB, on Slide 24, What assumptions, if any, did Invenergy make regarding how many megawatts Invenergy would clear in FCA-10?

RESPONSE 3-2: With regard to the ratepayer impacts summarized on Slide 24, Invenergy Thermal Development LLC ("Invenergy") assumed that approximately [REDACTED] MW of Clear River Energy Center's ("CREC") capacity would clear FCA-10.

RESPONDENT: Ryan Hardy, PA Consulting Group

DATE: April 26, 2016

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD**

**IN RE: INVENERGY THERMAL DEVELOPMENT LLC :
APPLICATION TO CONSTRUCT AND :
OPERATE THE CLEAR RIVER ENERGY : SB-2015-06
CENTER, BURRILLVILLE, RHODE ISLAND :**

**INVENERGY THERMAL DEVELOPMENT LLC’s RESPONSES TO
CONSERVATION LAW FOUNDATION’S THIRD SET OF DATA REQUESTS**

3-4. Would Invenergy's estimate of ratepayer impacts just for Rhode Island ratepayers, just in the capacity market, for Capacity Commitment Period 10 (June 1, 2019 through May 31, 2020), change if Invenergy had cleared only 1 MW in FCA-10? If yes, please describe: (i) how Invenergy's calculations would change; and (ii) how Invenergy's final result would change.

RESPONSE 3-4: Yes, based on the methodology utilized by PA Consulting Group. All else being equal, less capacity (whether CREC or another unit) clearing an FCA would result in a higher FCA clearing price given that the point at which the sloped demand curve intersects the supply curve would move upward and to the left. Based on the analysis that PA Consulting Group performed prior to FCA-10, if CREC had only cleared 1 MW, then the FCA capacity price would have increased to approximately [REDACTED]/kW-mo versus the [REDACTED]/kW-mo projected with approximately [REDACTED] MW clearing the FCA. As this is effectively the same scenario had CREC not cleared FCA-10 (i.e., 0 MW cleared), the resulting FCA-10 clearing price is effectively the same as what PA Consulting Group projected in the ‘Without Clear River’ scenario, effectively eliminating any capacity market savings for the 2019/2020 delivery year.

RESPONDENT: Ryan Hardy, PA Consulting Group

DATE: April 26, 2016

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: April 26, 2016

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2016, I delivered a true copy of the foregoing responses to the Energy Facilities Siting Board via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer