

Objections

Data Request 4-1. Please provide a detailed statement as to the status of negotiations or discussions between National Grid and Clear River for Clear River's access to, and payment for the use of National Grid's right-of-way.

National Grid specifically objects to Data Request 4-1 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence. National Grid also objects to this question as being duplicative of the Town of Burrillville's Data Request 1-1(b).

Data Request 4-2. Please provide copies of any and all documents, including correspondence, which relate or pertain to negotiations or discussions between National Grid and Clear River for Clear River's access to, or payment for, the use of National Grid's right-of-way.

National Grid specifically objects to Data Request 4-2 on the grounds that: (i) the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence; (ii) the Data Request is overly broad and unduly burdensome; (iii) the Data Request calls for privileged information that is protected by the work-product doctrine or attorney-client and common interest privileges; and (iv) the Data Request calls for the release of commercially sensitive information that is not subject to public disclosure. With respect to those responsive documents to which the attorney-client or common interest privilege applies, or that are protected by the attorney work product doctrine, National Grid objects to the production of a privilege log as unduly burdensome insofar as the Data Request is worded in such a way as to purport to require production of the entire body of correspondence between National Grid and its counsel with respect to the subject of the Data Request.

Data Request 4-3. Please identify each and every meeting relating to Clear River's access to, or payment for, the use of National Grid's right-of-way, whether in person, teleconference, or video conference. In your response, include the date, time, place, individuals present, a description of what was discussed, and any decisions made.

National Grid specifically objects to Data Request 4-3 on the grounds that: (i) the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence; (ii) the Data Request is overly broad and unduly burdensome; (iii) the Data Request calls for privileged information that is protected by the work-product doctrine or attorney-client and common interest privileges; and (iv) the Data Request calls for the release of commercially sensitive information that is not subject to public disclosure.

Data Request 4-4. If a Right of Way Agreement has been reached between National Grid and Clear River for Clear River's access to National Grid's right-of-way, please provide a copy of the agreement and all exhibits to the agreement.

National Grid specifically objects to Data Request 4-4 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence. National Grid also objects to this question as being duplicative of the Town of Burrillville's Data Request 1-3.

Data Request 4-5. If a Right of Way Agreement has not yet been reached between National Grid and Clear River for Clear River's access to National Grid's right-of-way, what is the anticipated timeline for closing the negotiations?

National Grid specifically objects to Data Request 4-5 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence. National Grid also objects to this question as being duplicative of the Town of Burrillville's Data Request 1-2.

Data Request 4-6. Please provide a detailed statement as to the status of negotiations or discussions between Clear River, National Grid, and ISO-NE to establish a new date when security will be posted.

National Grid specifically objects to Data Request 4-6 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Data Request 4-7. Please provide copies of any and all documents, including correspondence, which relate or pertain to negotiations or discussions between Clear River, National Grid, and ISO-NE to establish a new date when security will be posted.

National Grid specifically objects to Data Request 4-7 on the grounds that: (i) the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence; (ii) the Data Request is overly broad and unduly burdensome; (iii) the Data Request calls for privileged information that is protected by the work-product doctrine or attorney-client and common interest privileges; and (iv) the Data Request calls for the release of commercially sensitive information that is not subject to public disclosure. With respect to those responsive documents to which the attorney-client or common interest privilege applies, or that are protected by the attorney work product doctrine, National Grid objects to the production of a privilege log as unduly burdensome insofar as the Data Request is worded in such a way as to purport to require production of the entire body of correspondence between National Grid and its counsel with respect to the subject of the Data Request.

Data Request 4-8. Please identify each and every meeting relating to the establishment of a new date when security will be posted, whether in person, teleconference, or video conference. In your response, include the date, time, place, individuals present, a description of what was discussed, and any decisions made.

National Grid specifically objects to Data Request 4-8 on the grounds that: (i) the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence; (ii) the Data Request is overly broad and unduly burdensome; (iii) the Data

Request calls for privileged information that is protected by the work-product doctrine or attorney-client and common interest privileges; and (iv) the Data Request calls for the release of commercially sensitive information that is not subject to public disclosure.

Data Request 4-9. If a new date for when security will be posted has been established, please provide a copy of the agreement and all exhibits to the agreement.

National Grid specifically objects to Data Request 4-9 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Data Request 4-10. If a new date for when security will be posted has not been established, what is the anticipated timeline for closing the negotiations?

National Grid specifically objects to Data Request 4-10 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Data Request 4-11. Please provide a detailed statement as to the status of negotiations or discussions between Clear River, National Grid, and ISO-NE to establish a new date for the issuance of a notice to proceed.

National Grid specifically objects to Data Request 4-11 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Data Request 4-12. Please provide copies of any and all documents, including correspondence, which relate or pertain to negotiations or discussions between Clear River, National Grid, and ISO-NE to establish a new date for the issuance of a notice to proceed.

National Grid specifically objects to Data Request 4-12 on the grounds that: (i) the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence; (ii) the Data Request is overly broad and unduly burdensome; (iii) the Data

Request calls for privileged information that is protected by the work-product doctrine or attorney-client and common interest privileges; and (iv) the Data Request calls for the release of commercially sensitive information that is not subject to public disclosure. With respect to those responsive documents to which the attorney-client or common interest privilege applies, or that are protected by the attorney work product doctrine, National Grid objects to the production of a privilege log as unduly burdensome insofar as the Data Request is worded in such a way as to purport to require production of the entire body of correspondence between National Grid and its counsel with respect to the subject of the Data Request.

Data Request 4-13. Please identify each and every meeting relating to the establishment of a new date for the issuance of a notice to proceed, whether in person, teleconference, or video conference. In your response, include the date, time, place, individuals present, a description of what was discussed, and any decisions made.

National Grid specifically objects to Data Request 4-13 on the grounds that: (i) the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence; (ii) the Data Request is overly broad and unduly burdensome; (iii) the Data Request calls for privileged information that is protected by the work-product doctrine or attorney-client and common interest privileges; and (iv) the Data Request calls for the release of commercially sensitive information that is not subject to public disclosure.

Data Request 4-14. If a new date for the issuance of a notice to proceed has been established, please provide a copy of the agreement and all exhibits to the agreement.

National Grid specifically objects to Data Request 4-14 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Data Request 4-15. If a new date for the issuance of a notice to proceed has not been established, what is the anticipated timeline for closing the negotiations?

National Grid specifically objects to Data Request 4-14 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Data Request 4-16. How long after the notice to provide is issued and the security is posted will it take for National Grid to plan, design, construct, and energize the transmission project?

National Grid specifically objects to Data Request 4-16 on the grounds that the information requested is irrelevant to the issue before the EFSB and is unlikely to lead to discovery of admissible evidence.

Dated: February 23, 2018

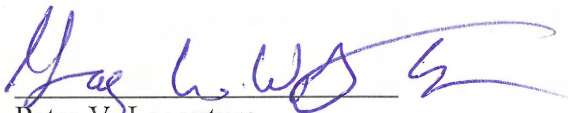
Respectfully submitted,

The Narragansett Electric Company
d/b/a National Grid

By its Attorneys,

ROBINSON & COLE LLP

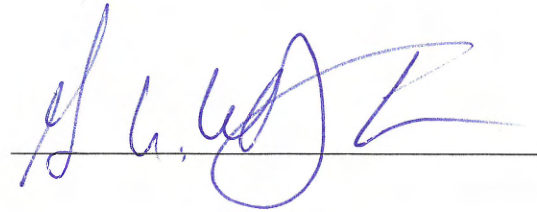




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CERTIFICATE OF SERVICE

I hereby certify that a copy of National Grid's Objection to the Fourth Set of Data Requests of the Town of Burrillville was delivered to the Service List associated with the Docket via electronic mail this February 23, 2018.

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be "S. G. [unclear]".