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December 11, 2006

Luly Massaro, Clerk
RI Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Interstate Navigation Company
Docket No. 3762

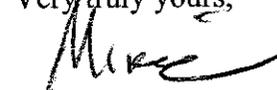
Dear Luly:

As you know, this office represents Interstate Navigation Company (Interstate).

Enclosed for filing in this matter are an original and nine copies of Interstate's Responses to the Commission's data requests.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg
In27:06-Massaro21

cc: Susan E. Linda
Joshua Linda
Walter E. Edge, Jr.
Service List

Interstate Responses to Commission Data Requests
Dated December 8th from Steve Frias, Legal Counsel
Docket No. 3762

Interstate has read the Division's letter dated December 11th, 2006 to the Commission. This letter summarizes the Division's overall position as it relates to the Commission's first set of data requests. Interstate supports in its entirety the Division's letter which Interstate believes provides an excellent overview of the negotiations between Interstate and the Division, and for the most part, addresses all of the Commission's concerns. Further, Interstate has read the Division's detailed responses to the Commission's data requests and found that the Division was unable to respond to Commission data request # 5. Please see the following response prepared by Interstate's regulatory accountant, Mr. Edge.

5. List Interstate's ROE on an annual basis for the last ten fiscal years.

Response: Using the PUC annual reports the Returns on Equity are as follows:

Date	Gain/(loss)	Equity	ROE
May 31 st 2006	(163,593)	3,770,115	(4.3%)
May 31 st 2005	84,878	3,934,068	2.2%
May 31 st 2004	(114,050)	3,733,013	(3.1%)
May 31 st 2003	(213,909)	3,847,063	(5.6%)
May 31 st 2002	171,647	4,060,972	4.2%
May 31 st 2001	232,970	3,889,325	6.0%
May 31 st 2000	239,698	3,656,355	6.6%
May 31 st 1999	313,550	3,416,657	9.17%
May 31 st 1998 *	(1,016,955)	3,103,107	(32.8%)
Sept 30 th 1997	448,497	3,035,932	14.8%

* Short period filing change of Interstate's fiscal year end.