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January 12, 2010

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Review of Proposed Town of New Shoreham Project, Pursuant to R.I.G.L. § 39-26.1-7 Docket No. 4111

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of Deepwater Wind Block Island, LLC's Supplemental Response to the Division of Public Utilities and Carriers First Set of Data Requests, Request DIV 1-17.

Please be advised that Deepwater Wind is seeking protective treatment of a confidential attachment identified as attachment DIV 1-17, as permitted by Commission Rule 1.2(g) and by RIGL §38-2-2(4)(i)(B). Enclosed you will find an original and nine (9) copies of Deepwater Wind's Motion for Protective Treatment along with one (1) copy of a confidential attachment to DIV 1-17. A confidential copy of this attachment has also been provided to the Division pending a determination of Deepwater Wind's Motion.

Also, enclosed you will find an original and nine (9) copies of Deepwater Wind's supplemental response to Division Data Request, 2-11.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

Joseph A. Keough, Jr.

JAK:prc
Enclosures

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF PROPOSED	:	
TOWN OF NEW SHOREHAM	:	
PROJECT PURSUANT TO	:	**DOCKET NO. 4111**
R.I. GEN. LAWS § 39-26.1-7	:	

DEEPWATER WIND BLOCK ISLAND, LLC'S MOTION FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

I. INTRODUCTION

Now comes Deepwater Wind Block Island, LLC ("Deepwater Wind") and hereby requests that the Rhode Island Public Utilities Commission ("Commission") provide confidential treatment to, and grant protection from public disclosure of, certain confidential business, trade and financial information that is proprietary and competitively sensitive. Deepwater Wind makes this request pursuant to Commission Rule 1.2(g) and RIGL §38-2-2 (4)(i)(B). Deepwater Wind also requests that the Commission preliminarily grant its request for confidential and protective treatment pursuant to Rule 1.2(g)(2).

II. FACTS

On January 12, 2010, Deepwater Wind is filing with the Commission a response to the Division of Public Utilities and Carriers' ("Division") First Set of Data Requests, Request 1-17 ("Request"). This Request calls for Deepwater Wind to provide "pro forma financial statements" that show "revenues, expenses, and net income and after-tax cash flows" for the proposed Block Island Wind Farm, which is the subject of this Docket. In

response to this Request, Deepwater Wind is providing confidential, business, trade and financial information that is proprietary and competitively sensitive.

III. LEGAL STANDARD

Commission Rule 1.2(g) provides that access to a public record shall be granted in accordance with the Access to Public Records Act ("APRA"), RIGL §38-2-1, et seq. Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a "public record", unless the information set forth in the documents and materials falls within one of the enumerated exceptions identified in RIGL §38-2-2(4). As such, the Commission has the authority under the APRA to protect such information from public disclosure and deem it to be confidential provided it falls within one of the specific exceptions to the APRA. A review of RIGL §38-2-2(4)(i)(B) indicates that the following records are not deemed to be public:

> "Trade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature."

The Rhode Island Supreme Court interpreted the APRA to define as confidential "any financial or commercial information whose disclosure would likely … cause substantial harm to the competitive position of the person from whom the information was obtained." *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). In making this determination, the Supreme Court set forth a two-prong test. The first prong assesses whether the information was provided voluntarily to a governmental agency. *Id.* at 47. If the answer to this first question is in the affirmative, then the next question becomes whether the information "is of a kind that would customarily not be released to the public by the person from whom it was obtained." *Id.*

Furthermore, the Supreme Court has held that agencies making determinations as to the disclosure of information under the APRA may apply the balancing test established in *Providence Journal v. Cane*, 577 A.2d 661, (RI 1990). Under this test, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure.

IV. BASIS FOR CONFIDENTIALITY

Deepwater Wind is providing a response to the Division's Request on a voluntary basis to assist the Division in the discharge of its broad statutory duties of review. The information Deepwater Wind is providing would not ordinarily be released to the public. Furthermore, public disclosure of this information would cause substantial harm to Deepwater Wind's competitive position within the renewable energy industry. The data set forth in this response has been developed by Deepwater Wind using proprietary analysis. The information reflects the results of internal business decisions, opinions, and experience of Deepwater Wind. The public disclosure of this information will put Deepwater Wind at a competitive disadvantage, and will have an irreversible and detrimental effect on Deepwater Wind's ability to negotiate and compete in future offshore wind projects. Disclosure would also reveal the internal business decisions of Deepwater Wind that would give competitors an unfair advantage due to their knowledge of Deepwater Wind's financial strategies, internal cost structure, and business plans.

V. CONCLUSION

For the reasons set forth herein, Deepwater Wind hereby requests that the Rhode Island Public Utilities Commission grant the relief sought herein and grant protective and

confidential treatment to the information produced in response to the Division of Public Utilities and Carriers' Data Request 1-17.

DEEPWATER WIND BLOCK ISLAND, LLC
By its attorney,

Joseph A. Keough, Jr., Esquire # 4925
KEOUGH & SWEENEY, LTD.
100 Armistice Boulevard
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(401) 724-3600

CERTIFICATION

I hereby certify that on January 12, 2010, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET No. 4111
Deepwater Wind Block Island, LLC
Supplemental Response To
The Division Of Public Utilities And Carriers' Data Requests
SET 1

Div. 1-17: Please provide pro forma financial statements for the project showing revenues, expenses, and net income and after tax cash flows.

Response: Deepwater Wind will work with the Division to provide a response to this request.

However, in light of the Commission's Rules of Practice and Procedure regarding the timing of responses to data requests, and to preserve its rights pending those discussions, Deepwater Wind objects as this request, in its broadest interpretation, is overly broad, calls for speculation, and calls for the production of confidential business, proprietary, trade and financial information.

Supplemental Response: While the requested confidential and internal financial information is not strictly relevant to an analysis of commercial reasonableness under the applicable statute, Deepwater Wind is mindful of the Division's need to discharge its broad statutory duties of review. As such, responsive information has been provided to the Division pursuant to a Motion For Protective Treatment of Confidential Information as provided for by Rule 1.2(g)(2) of the Commission's Rules of Practice and Procedure and R.I.G.L. § 38-2-2.

Prepared by: William Moore and Attorney Joseph A. Keough Jr. (as to objection)

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET No. 4111
Deepwater Wind Block Island, LLC
Supplemental Response To
The Division Of Public Utilities And Carriers' Data Requests
SET 2

Div. 2-11: Please provide a copy of the NYSERDA report referred to in the testimony of Mr. Nickerson at page 11 in footnote 4.

Response: The requested report is not in the possession of Mr. Nickerson or Deepwater Wind. As indicated in the referenced footnote, the data is from extracted pages of a pre-release draft of upcoming study prepared by AWS Truewind LLC for New York State Energy Research and Development Authority (NYSERDA), entitled "NY's Offshore Wind Energy Development Potential in the Great Lakes", dated December 2009. With permission from the author and NYSERDA's contract manager, only the relevant pages (pp. 145 to 150 of a Confidential Review Draft) were relayed to Mr. Nickerson and Deepwater Wind, for the limited purpose of supporting Mr. Nickerson's analysis. The data provided and used in the analysis underlying the testimony was a compilation of publically available data on offshore wind project costs. The authors describe the data sources as follows: "Sources of project cost information for this analysis include a variety of trade publications and industry websites (such as ww.offshorewindenergy.org), a clean energy financial research database (New Energy Finance), expert opinions expressed in recent reports and conference presentations, and personal communications." Only the specified pages were provided to Deepwater Wind due to the review status of the draft document (labeled: Confidential, may be shared within client's organization). However, all of the data used from this report was produced in its entirety in Exhibit B (first 25 rows, and all but last 4 columns). According to NYSERDA's contract manager, a public draft of the report is anticipated shortly, and Deepwater Wind will file such a draft as soon as it is made available.

Supplemental Response: The lead author of the report and the NYSERDA Contract Manager have authorized the release of the 6 pages of the report referenced in the original response. Please see enclosed.

Prepared by: David Nickerson

10.0. Economic Overview

Economics plays a critical role when assessing the feasibility of offshore wind energy. This section identifies the major cost variables comprising a wind project investment and estimates the cost of energy derived from a hypothetical offshore wind project. For comparison purposes, costs are given for conventional wind projects on land as well. Financial incentives for wind development are also discussed.

10.1. Offshore Project Costs

Offshore wind energy projects cost significantly more per MW than onshore projects (approximately twice as much). Additional installed costs result from offshore turbine foundations, specialized installation processes and equipment for turbines and balance-of-plant infrastructure, and higher development costs associated with offshore planning.

To date, offshore wind development has taken place almost exclusively in Europe, with the first project emerging in the Far East in 2009. At this time, a reasonable approach to project the cost of a US-based offshore project is to analyze the European wind market experience and cost information that is publicly available. Therefore, in order to assess the potential cost of an offshore wind energy project in the Great Lakes, international offshore wind project cost data was retained and analyzed.

Sources of project cost information for this analysis include a variety of trade publications and industry websites (such as www.offshorewindenergy.org), a clean energy financial research database (New Energy Finance), expert opinions expressed in recent reports and conference presentations, and personal communications. In cases where sources gave differing costs for the same project, the higher figure was used based on our assumption that it represented the more inclusive value. It is possible that some published costs are not fully inclusive (especially with regard to interconnection); however, this could not be verified for every project for this analysis.

Figure 10.1 illustrates the published installed costs of 25 offshore projects, 18 of which have been commissioned or are under construction in Europe and China. Projected costs are included for 7 projects due to be commissioned between 2010 and 2012 that have already secured financing. Table 10.1 gives vital statistics for the 25 projects, including MW capacity, distance from shore, and water depth.

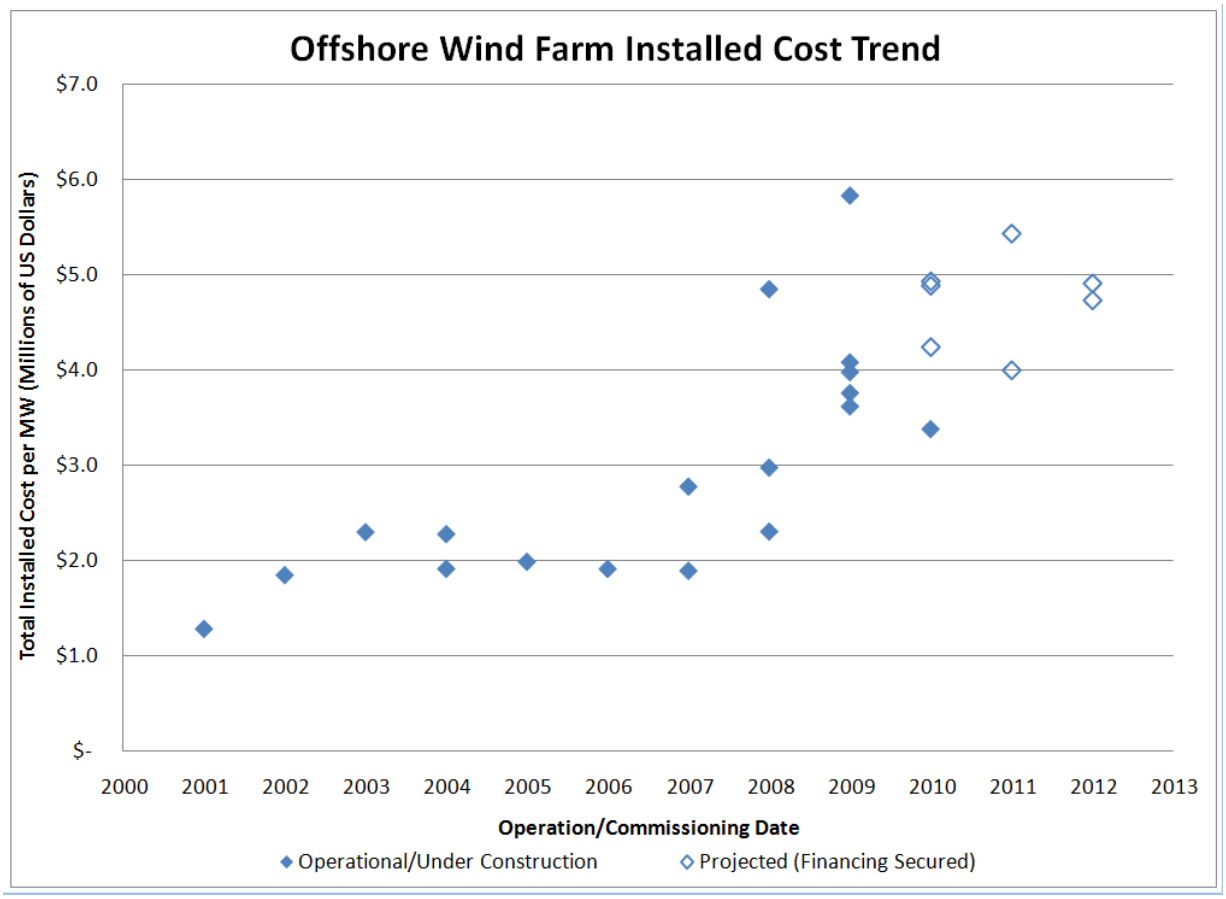

Figure 10.1: Offshore Wind Project Cost per MW Over Time

Up through 2007, the total installed cost of projects ranged between $1.3 and $2.8 million per MW (i.e., mean of $2.1 million/MW + 38%).115 In 2008, higher costs began to be realized. For several projects now under construction and others scheduled to be built within the next three years, costs are in the range of $3.4 – $5.8 million per MW (i.e., mean of $4.6 million/MW ± 26%). This rise in mean cost of 119% is attributable to several factors:

- The increase in commodity and fuel prices, which affected many equipment and construction intensive industries, not just the wind sector. The costs of land-based wind projects increased 60-100% over the same period.
- Turbine supply chain shortages and bottlenecks
- Higher profit margins on turbine sales
- Better understanding of project risks after learning from earlier projects
- Fluctuations in currency exchange rates
- Increasing distance from shore and water depth.

Thus, data was separated into two subsets prior to and after the cost increase that occurred in 2008. Total installed cost was plotted against project nameplate capacity to determine the effect of project

[115] Dollar values were converted from European currencies using the average exchange rates for the given year.

size on cost. Based on the data shown in Figure 10.2, it is not conclusive whether larger offshore wind projects will benefit from economies of scale with lower per MW costs. This is due to the limited number of projects built thus far and the fact that the project characteristics (location, water depth, distance from shore, foundation type) differ significantly from site to site. Customized approaches to project financing, materials handling, transport, and installation is also a factor contributing to economies of scale. As more projects are built using standardized practices, economies of scale may become more evident.

Figure X indicates that later projects have tend to exhibit a larger project size, and depicts the significance in the increased installed costs beginning in 2008. Industry projections for future cost trends are mixed partly because of the current recession and the uncertainty over the timing and pace of a recovery. But the general consensus is that costs will either hold roughly steady or increase further. Installed cost estimation for a potential Great Lakes project was based on the post-2007 data set, assuming costs will continue at the current level

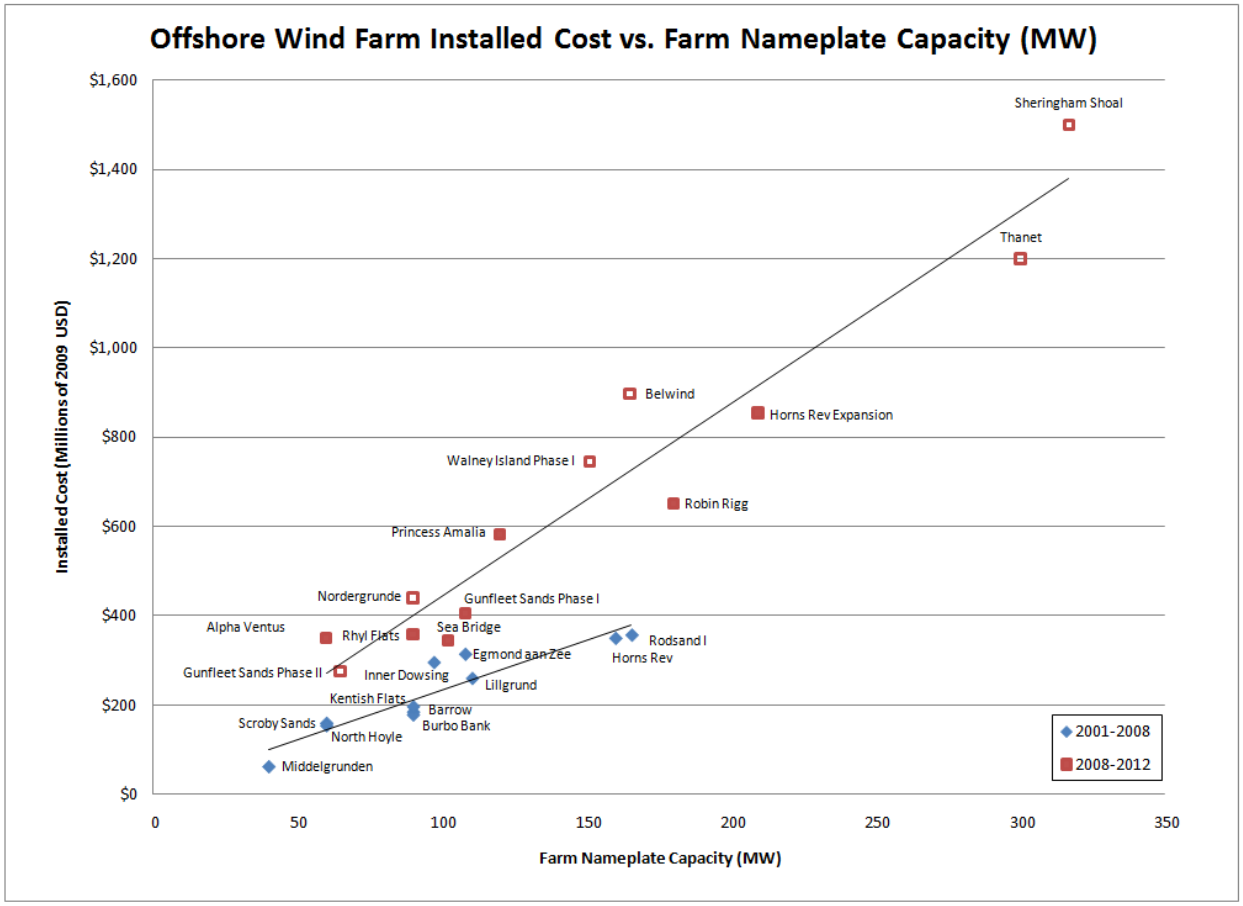

Figure 10.2: Installed Cost of Offshore Projects, 0 to 350 MW

Table 10.1: Offshore Wind Project Installed Costs and Statistics

Project Name	Country	Status	Operating Year	Project Cost ($M)	Project Capacity (MW)	Project Cost per MW ($M)	No. Turbines	Turbine Size (MW)	Turbine Model	Water Depth (m)	Distance from Shore (km)
Middelgrunden	Denmark	Commissioned	2001	$ 51	40	$ 1.28	20	2	Bonus 2 MW	5 to 10	2 to 3
Horns Rev	Denmark	Commissioned	2002	$ 295	160	$ 1.84	80	2	Vestas V80	6 to 14	14 to 17
North Hoyle	United Kingdom	Commissioned	2003	$ 138	60	$ 2.30	30	2	Vestas V80	5 to 12	7.5
Nysted	Denmark	Commissioned	2004	$ 316	165.6	$ 1.91	72	2.3	Siemens 2.3	6 to 10	6 to 10
Scroby Sands	United Kingdom	Commissioned	2004	$ 136	60	$ 2.27	30	2	Vestas V80	2 to 10	3
Kentish Flats	United Kingdom	Commissioned	2005	$ 179	90	$ 1.98	30	3	Vestas V90	5	8.5
Barrow	United Kingdom	Commissioned	2006	$ 172	90	$ 1.91	30	3	Vestas V90	15	7
Burbo Bank	United Kingdom	Commissioned	2007	$ 170	90	$ 1.89	25	3.6	Siemens 3.6	10	5.2
Egmond aan Zee	Netherlands	Commissioned	2007	$ 300	108	$ 2.77	36	3	Vestas V90	17 to 23	8 to 12
Inner Dowsing	United Kingdom	Commissioned	2008	$ 289	97.2	$ 2.97	27	3.6	Siemens 3.6	10	5.2
Lillgrund	Sweden	Commissioned	2008	$ 254	110.4	$ 2.30	48	2.3	Siemens 2.3	2.5 to 9	10
Princess Amalia	Netherlands	Commissioned	2008	$ 582	120	$ 4.85	60	2	Vestas V80	19 to 24	> 23
Alpha Ventus	Germany	Under construction	2009	$ 350	60	$ 5.83	12	5	Multibrid & REpower	30	45
Gunfleet Sands I	United Kingdom	Under construction	2009	$ 406	108	$ 3.76	30	3.6	Siemens 3.6	2 to 15	7
Horns Rev Expansion	Denmark	Under construction	2009	$ 854	209.3	$ 4.08	91	2.3	Siemens 2.3	9 to 17	30
Rhyl Flats	United Kingdom	Under construction	2009	$ 358	90	$ 3.98	25	3.6	Siemens 3.6	8	8
Robin Rigg	United Kingdom	Under construction	2009	$ 651	180	$ 3.62	60	3	Vestas V90	>5	9.5
Gunfleet Sands II	United Kingdom	Financing secured	2010	$ 275	64.8	$ 4.24	18	3.6	Siemens 3.6	2 to 15	7
Nordergrunde	Germany	Financing secured	2010	$ 440	90	$ 4.89	18	5	REpower 5M	4 to 20	30
Sea Bridge	China	Under construction	2010	$ 345	102	$ 3.38	34	3	Sinovel 3 MW	8 to 10	8 to 14
Walney	United Kingdom	Financing secured	2010	$ 746	151.2	$ 4.93	42	3.6	Siemens 3.6	20	7
Belwind	Belgium	Financing secured	2011	$ 897	165	$ 5.44	55	3	Vestas V90	20 to 35	46
Thanet	United Kingdom	Financing secured	2011	$ 1,200	300	$ 4.00	100	3	Vestas V90	20 to 25	7 to 8.5
London Array	United Kingdom	Financing secured	2012	$ 3,095	630	$ 4.91	175	3.6	Siemens 3.6	23	>20
Sheringham Shoal	United Kingdom	Financing secured	2012	$ 1,500	316.8	$ 4.73	88	3.6	Siemens 3.6	16 to 22	17 to 23

10.2. Cost Breakdown

Figure 10.3 compares the installed cost components of offshore and land-based projects. The support structure (foundation and tower) and electrical collection and transmission system of an offshore project constitute larger fractions of the capital costs relative to land projects. Wind turbines constitute less than half the cost of an overall offshore project investment.

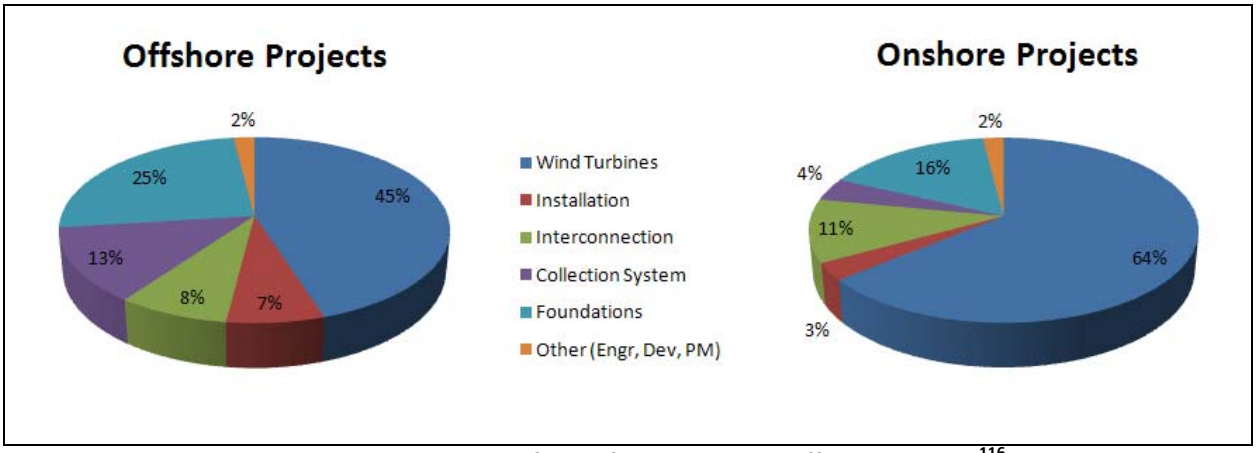

Figure 10.3: Breakdown of costs for onshore and offshore projects[116]

Table 10.2 lists cost components found within different phases of project development, from permitting to commissioning. Construction costs and schedules are very dependent on weather, waves, geotechnical conditions, foundation types and installation technique, and on the availability of specialized vessels. At the 160 MW Horns Rev project in Denmark, which uses monopile foundations, approximately one day was required to install a foundation, one day to install the transition piece, and one day to install the turbine (load, transport and erect).

[116] Data modified April 2009 based on AWST research of industry journals and conference proceedings. Original data taken from "Offshore Wind Energy in Europe—A Review of the State-of-the-Art," Wind Energy, Vol. 6, No. 1, January-March 2003, Wiley, pg. 42.

Table 10.2: Project Cost Components

Development	Engineering	Equipment procurement and delivery	Construction
Site permitting	Foundations, scour protection	Meteorological equipment	Foundation piles, transition piece, tower erection
Meteorological studies including monitoring	Electrical facilities	Turbines	Turbine erection
Environmental studies	Operation and maintenance facilities	Tower	Plant start up and commissioning
Geotechnical studies	Site surveying	Supervisory Control and Data Acquisition (SCADA)	Construction contracting, project management and administration
Public outreach	Preparation of drawings	Electrical cable and collection system	FAA lighting
Power purchase agreement	Inspections/approvals	Offshore substation	Bonding

10.3. Cost of Energy

The cost of energy from a wind project includes several factors besides those constituting the initial capital costs. In basic terms, the total expenses required to build and operate a project over its effective lifetime, divided by the total energy generated by the project, yields the cost of energy (i.e., dollars per kWh). Lower energy costs are therefore attainable at windier sites when capital and operating costs among sites are comparable. The cost of energy is affected by a variety of inputs, including:

- A capital structure consisting of both equity and debt portions
- Operations and maintenance (O&M) costs
- The life span of the wind turbines (assumed to be 20 years)
- The annual inflation rate
- The debt service coverage ratio
- The loan terms (payback period and interest rate)
- The target return on equity (assumed to be 18%)
- Government incentives, including the Production Tax Credit (PTC), the Investment Tax Credit (ITC), and the Federal Cash Grant (explained in more detail below)
- Depreciation of the plant's value over time
- Net annual energy production generated by the project

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET No. 4111
Deepwater Wind Block Island, LLC
Supplemental Response To
The Division Of Public Utilities And Carriers' Data Requests
SET 2

CERTIFICATION

I hereby certify that on January 12, 2010, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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The Division Of Public Utilities And Carriers' Data Requests
SET 2

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