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January 25, 2010

BY HAND DELIVERY AND EMAIL

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

Re: RIPUC Docket No. 4111

Dear Luly:

Enclosed please find for filing in this matter an original and nine (9) copies of the responses of the Town of New Shoreham to the data requests of Maggie and Michael Delia.

Copies of this filing are being emailed to the Commission and the service list today.

Please date stamp the enclosed duplicate copy of this cover letter for my file.

Do not hesitate to contact me if you have any questions concerning this filing. Thank you for your assistance.

Sincerely yours,

Alan D. Mandl, Bar No. 6590

Enclosures
cc: Service List

IN RE: REVIEW OF PROPOSED)
TOWN OF NEW SHOREHAM)
PROJECT PURSUANT TO)
R.I. GEN. LAWS §39-26.1-7)

DOCKET NO. 4111

**RESPONSES OF THE TOWN OF NEW SHOREHAM TO DATA REQUESTS OF
MAGGIE DELIA AND MICHAEL DELIA**

REQUEST 1-2 Please provide all contracts, agreements, payments or other forms of compensation or support provided to the Town of New Shoreham by any entity for any and all services rendered on behalf of the Town including but not limited to legal, professional consulting, engineering, and research in regard to the PPA being considered in Docket 4111.

RESPONSE: The Town is being reimbursed by Deepwater Wind for legal and consulting expenses incurred in connection with its participation in Docket No. 4111. The Town is receiving no other source of compensation for its work in evaluating the project. Deepwater Wind offered assistance to the Town at a Town Council meeting and specifically stated that the reimbursement did not constitute any involvement in or control of our legal or expert team and that has held true. DWW reimburses the Town after the Town pays the bills. There is no formal contract between the Town and Deepwater Wind and as such the Town is unaware of the permanence of this reimbursement.

RESPONDENT: Richard La Capra

DATE: January 25, 2010

IN RE: REVIEW OF PROPOSED)
TOWN OF NEW SHOREHAM)
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DOCKET NO. 4111

**RESPONSES OF THE TOWN OF NEW SHOREHAM TO DATA REQUESTS OF
MAGGIE DELIA AND MICHAEL DELIA**

REQUEST 1-4 In the recent Public Utilities Commission public hearing held on Block Island, the 1st Warden of New Shoreham delivered a statement, part of which is as follows...” As presented by the experts, the cable sizing, routing, design and cost are either preliminary or not yet determined. Consequently, we request that the Commission defer any specific review or approval of the cable project until the PPA has been acted upon and the specifications for the cable are firmly established.” Please cite the provision(s) in the current PPA, JDA or R.I.G.L. §39-26-1 which promulgates that the transmission cable is a separate project from the energy portion of Docket 4111.

RESPONSE: The statement made by the 1st Warden does not claim that the PPA and transmission cable are separate projects. The Town of New Shoreham Project statute requires the PUC to rule on all aspects of the project, but does not state the PUC must rule on all aspects at exactly the same time. The contracting parties, National Grid and Deepwater Wind apparently understand this to be the case as well, since they (1) filed a completed PPA for the Commission's review, but did not file a completed undersea cable plan; and (2) made the effectiveness of the PPA subject to receipt of regulatory approvals regarding the transmission cable.

RESPONDENT: Richard La Capra

DATE: January 25, 2010

