

RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF AMENDED POWER :
PURCHASE AGREEMENT BETWEEN : DOCKET NO. 4185
NARRAGANSETT ELECTRIC COMPANY :
D/B/A NATIONAL GRID AND DEEPWATER :
WIND BLOCK ISLAND, LLC PURSUANT TO :
R.I. GEN. LAWS § 39-26.1-7 :

AMENDEMENT TO ATTORNEY GENERAL PATRICK C. LYNCH'S
MOTION FOR PROTECTIVE ORDER

Earlier, the Attorney General moved for a Protective Order with respect to the following
Data Request from Deepwater Wind to the Attorney General:

1-1. On page 3 of Mr. Short's direct testimony, he states that he "represents the owners or developers of wind, biomass, solar and hydro-electric projects," and that he qualifies, manages and sells for "these clients" all of their REC production. In reference to this testimony, please provide the name and address of each of his clients who are owners or developers of wind, biomass, solar and hydro-electric projects for which he qualifies, manages and sells REC production.

1-2. On page 3 of Mr. Short's direct testimony, he states that he represents "load serving entities in Connecticut, Massachusetts, Maine, New Hampshire and Rhode Island" and that he regularly manages and purchases all the REC requirements for "these clients." In reference to this testimony, please provide the name and address of each of his clients who are load serving entities for which he purchases all their REC requirements.

Specifically certain information was not disclosed by the Attorney General in connection with the set of data request responses furnished by the Attorney General in response to Deepwater Wind Data Request 1-1 & 1-2 (set forth above). Such disclosure was the subject of an objection. MOREOVER, such non-disclosure is the subject of a motion for a protective order.

Two documents (DR responses containing the information) are provided herewith under seal (in envelopes) to complete the official paper filing.

The first document, responsive to Deepwater Wind Data Response 1-1, lists and identifies by name 17 companies (designated by an assigned number, 1-17).

The Attorney General affirms the following facts: the firms identified as #16 and #17 have consulting agreements with Mr. Short, drafted by those companies, that contain explicit clauses prohibiting him from mentioning the fact that he works for either of these two entities. The bulk of the remainder, being firms ## 1-14, have consulting agreements with Mr. Short, drafted by Mr. Short, that have standard clauses prohibiting such disclosure.

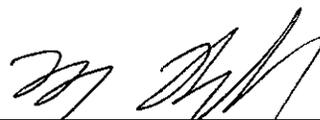
With respect to the remaining firm, firm #15, the firm has told Mr. Short that Mr. Short cannot mention that firm's name at all but this has not been formalized in writing.

The sealed envelopes accompanying the Commission-filed hard-copy of this motion contain the responsive document. The electronic copies do not have that information in other words, the electronic versions of this document -- being served on the parties -- do not include the sealed information.

RESPECTFULLY SUBMITTED
INTERVENOR,

PATRICK C. LYNCH
ATTORNEY GENERAL

By his Attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of August, 2010, that I transmitted an electronic copy of the within document to the service list and to Luly Massaro, Commission Clerk via electronic mail.



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