



797 BALD HILL ROAD  
WARWICK, RI 02886

401-821-1330  
FAX 401-823-0970  
E-MAIL: [jjm@petrarcamcgair.com](mailto:jjm@petrarcamcgair.com)  
[www.petrarcamcgair.com](http://www.petrarcamcgair.com)

July 30, 2010

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

Re: PUC Docket No. 4185  
Review of Amended Power Purchase Agreement  
Between Narragansett Electric Company d/b/a  
National Grid and Deepwater Wind Block Island, LLC  
Pursuant to R.I. Gen. Laws §39-26.1-7 as Amended

Dear Ms. Massaro,

Enclosed herewith you will find an original and twelve copies of Citizen Interveners Response to Deepwater Wind Data Requests in the above matter. The same was sent electronically to the attached service list today.

Please be advised that Citizen Interveners object to Deepwater Wind Data Request 1-1 as the same is overly broad and calculated to be punitive in nature to the expense of the Citizen Interveners; however, without waiving objection, the Citizen Interveners hereby produce response to this Deepwater Wind Data Request.

Very truly yours,

Joseph J. McGair, Esq.

JJM:dd  
Enc.  
HAND-DELIVERED  
Cc: Electronic service list

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**DOCKET No. 4185**

**Robert McCullough's**

**Response To**

**Deepwater Wind Block Island's Data Requests**

**Issued July 30, 2010**

DWW 1-1: Please produce all of Mr. McCullough's work papers, which collectively support his opinions, calculations and the conclusions reached in his testimony.

Response: See NG 1-1.

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET No. 4185**  
**Robert McCullough's**  
**Response To**  
**Deepwater Wind Block Island's Data Requests**  
**Issued July 30, 2010**

DWW 1-2: Please have Mr. McCullough list and describe all offshore wind projects that he has been involved in developing, engineering, constructing or operating.

Response: None.

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**DOCKET No. 4185**

**Robert McCullough's**

**Response To**

**Deepwater Wind Block Island's Data Requests**

**Issued July 30, 2010**

DWW 1-3: Please have Mr. McCullough list all offshore wind projects in which he has participated in securing equity investments and describe his role in the capital raise.

Response: None.

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET No. 4185**  
**Robert McCullough's**  
**Response To**  
**Deepwater Wind Block Island's Data Requests**  
**Issued July 30, 2010**

DWW 1-4: Please have Mr. McCullough describe his experience in securing project financing for renewable energy projects whose capital costs exceed \$100 million. In providing his description, please have Mr. McCullough identify:

- a. The specific projects,
- b. The financial institutions involved;
- c. His role in the financing;
- d. Whether each project qualified for the U.S. Treasury program introduced by Section 1603 of the American Recovery and Reinvestment Act of 2009; and
- e. Whether each project has already applied for or received funds under that program.

Response: None. Mr. McCullough and his firm have been involved in the evaluation and due diligence of projects, not financing. To the degree Mr. McCullough has knowledge of his clients' financing and tax matters, this information is subject to confidentiality agreements.

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**DOCKET No. 4185**

**Robert McCullough's**

**Response To**

**Deepwater Wind Block Island's Data Requests**

**Issued July 30, 2010**

DWW 1-5: Please have Mr. McCullough list all renewable energy projects with capital costs in excess of \$100 million in which he has participated in securing equity investments and have him describe his role in the capital raise.

Response: None. Mr. McCullough and his firm have been involved in the evaluation and due diligence of projects, not financing. To the degree Mr. McCullough has knowledge of his clients' equity financing, this information is subject to confidentiality agreements.