

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**DOCKET No. 4185**

**Deepwater Wind Block Island, LLC**

**Data Requests to**

**Thomas Doyle, Patricia Doyle, James E. O'Neil, Rosemary Ives, Jonathan Ives, Michael Beauregard and Laurence Ehrhardt ("Citizen Intervenors")**

**Set 1**

- 1-1. Please produce all of Mr. McCullough's work papers, which collectively support his opinions, calculations and the conclusions reached in his testimony.
- 1-2. Please have Mr. McCullough list and describe all offshore wind projects that he has been involved in developing, engineering, constructing or operating.
- 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.
- 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.
- 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.