

**Rhode Island Economic Development Corporation's Responses to
the Attorney General Patrick C. Lynch's Second Set of Data Requests
Date Issued: July 23, 2010**

Docket No.: 4185

REQUEST AG 2-1:

Please state whether EDC or any other state agency has commissioned any studies to determine whether job will be created as a result of Town of New Shoreham Project, if so, state the date thereof, identify with specificity the study and all facts which otherwise support your answer to this request.

EDC RESPONSE 2-1:

The EDC objects to the request that it be required to produce evidence of studies conducted or commissioned by other Rhode Island state agencies based on relevance and based on the unduly burdensome nature of the request that the EDC provide evidence that is not within its control or authority. Without waiving this objection, the EDC responds as follows:

Please see the EDC Advisory Opinion and attachment dated July 20, 2010, and the corrections to the EDC Advisory Opinion dated July 26, 2010, both of which are on file in this docket.

Respondent as to the Objection: Alan M. Shoer, Counsel to RIEDC

Respondent: Fred S. Hashway, Director of Government Affairs and Policy, RIEDC

Date: July 29, 2010

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REQUEST AG 2-2:

Please state whether EDC or any other state agency (exclusive of the Department of Attorney General, the PUC, and the DPUC) has studied the rate payer impact of the proposed Town of New Shoreham Project.

EDC RESPONSE 2-2:

EDC objects to the question because the EDC is not required by R.I. Gen. Laws § 39-26.1-7 to conduct, and has not conducted, an analysis of the rate payer impact of the proposed Town of New Shoreham Project.

The EDC further objects to the request that it be required to produce evidence of rate payer analysis conducted or commissioned by other Rhode Island state agencies.

Respondent as to the Objection: Alan M. Shoer, Counsel to RIEDC

Date: July 29, 2010

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REQUEST AG 2-3:

Please state whether there are any sanctions which may be imposed by the state against Deepwater for failure to provide jobs as represented, and identify any contract provision which relates thereto.

EDC RESPONSE 2-3:

The obligations of Deepwater are described in the Joint Development Agreement and Development Agreement, both of which were filed in docket 4111.

Respondent: Fred S. Hashway, Director of Government Affairs and Policy, RIEDC

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REQUEST AG 2-4:

Does the RIEDC maintain that there is available land and access at the Quonset Port Facility that is not under option to Deepwater Wind and that would be sufficient for another developer to assemble marine wind turbine structure there fore transport for installation? If so, state the factual basis of that position. If so, also identify with precision the person with the most knowledge of the facts to support such proposition, including that individual's name, business address, business phone, business emails, professional, and role at, in connection, with the EDC. State the basis of that person's knowledge?

EDC RESPONSE 2-4:

Yes, the RIEDC maintains that there is available land and access at the Quonset Port Facility that is not under option to Deepwater Wind and that would be sufficient for another developer to assemble marine wind turbine structures. Please see the RIEDC's response to the Commission's Data Request 1-3 as the factual basis for this position.

The person with most knowledge of the facts to support this position is:

Keith Stokes
Executive Director
Rhode Island Economic Development Corporation
Chairman of the Board
Quonset Development Corporation (a subsidiary of RIEDC)
315 Iron Horse Way, Suite 101
Providence, RI 02908
(p) 401-278-9100
kstokes@riedc.com

Respondent: Fred S. Hashway, Director of Government Affairs and Policy, RIEDC

Date: July 29, 2010