Rhode Island Economic Development Corporation's Responses to
Toray Plastics (America), Inc.'s First Set of Data Requests
Date Issued: July 22, 2010

Docket No.: 4185

Part I: Relating to the EDC Advisory Opinion report:

REQUEST TORAY 1-1:

Did you input into IMPLAN the data for the negative impacts that would be caused by high electricity prices for all ratepayers, especially the above market cost that would be paid for electricity as calculated by National Grid (NG) in docket 4111? If so, what kind of "data retrieval" (attachment 1) was used for the input? (Please answer this question separately for both the Block Island demonstration project and the large scale project.)

EDC RESPONSE 1-1:

EDC objects to the question as not relevant to the proceeding. Without waiving the objection, EDC responds as follows:

No.

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

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

Date: July 29, 2010

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REQUEST TORAY 1-2:

Does the data you inputted into IMPLAN reflect the existing RI business profile (i.e., what kind of businesses currently exist in RI)? Did you use 1985 regional data as you described in attachment 1? If so, do you think the existing regional data today is the same as the 1985 data? Please explain.

EDC RESPONSE 1-2:

EDC objects to the question as not relevant to the proceeding. Without waiving the objection, EDC responds as follows:

The data inputted into IMPLAN reflects the existing Rhode Island business profile, using the most up to date 2008 data. Attachment 1 to the Advisory Opinion was taken from the "What is IMPLAN" section of the IMPLAN website and the 1985 regional data referenced therein was not used.

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

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

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REQUEST TORAY 1-3:

Are you aware of any statistical data to prove that IMPLAN can give you realistic estimate from your actual experiences in the past? If so, please provide the data.

EDC RESPONSE 1-3:

Mr. Parker is not aware of any statistical data to prove or disprove that IMPLAN provides realistic estimates.

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

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Docket No.: 4185

REQUEST TORAY 1-4:

On page 11, you said that every MW can displace 26 million cf of natural gas, and you calculated that 750 million cf of natural gas displacement can be achieved by the Block Island demonstration project. It appears that you used the name plate capacity of 28.8MW to make your calculations, even though actual output is estimated to be only 40% of name plate capacity. Is this correct? Please explain your answer.

EDC RESPONSE 1-4:

According to the US Department of Energy document Wind Powering America: "…131,000 barrels of oil would be needed to generate the same amount of electricity as a single [onshore] 1.5 MW wind turbine generates over 20 years." This amount of oil is equivalent to 4,366.67 barrels per MW-year of onshore wind. Mr. Parker adjusted those oil savings to reflect (i) BIWF's capacity of 28.2 MW, (ii) BIWF's higher anticipated capacity factor compared to onshore wind, and (iii) efficiency differences between oil-fired and gas-fired power plants to arrive at his conclusion.

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

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REQUEST TORAY 1-5:

On page 4, the title says "facilitate new and existing business expansion". Please separate table 1 data so that the new and existing business contributions are shown separately.

EDC RESPONSE 1-5:

The IMPLAN model assumes that the BIWF project's contribution to GDP in RI will either be generated directly by Deepwater or indirectly by other Rhode Island businesses. The IMPLAN model does not differentiate between GDP contributions from new or existing businesses. Separation of Table1 data along these lines is not possible.

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Part II: Pertaining to Direct testimony of Mr. Parker:

REQUEST TORAY 1-6:

Do you think that the floating structure you mentioned on page 7 can he adopted in the future large scale project? If so, what is the benefit of utilizing the conventional method in the Block Island demonstration project?

EDC RESPONSE 1-6:

Neither LAI nor the EDC are technical experts on offshore wind projects and have no opinion on floating structures.

Respondents: Seth G. Parker, Vice President, Levitan & Associates, Inc. and
Fred S. Hashway, Director of Government Affairs and Policy, RIEDC

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Docket No.: 4185

REQUEST TORAY 1-7:

Do you know any case in which the final construction cost ended lower than budget in either an onshore or an offshore wind project? If so, please identify the project(s) and explain the reason(s) why the cost ended up lower. (Page 16).

EDC RESPONSE 1-7:

Neither the EDC, nor LAI has knowledge of actual versus budgeted construction costs for onshore or offshore wind projects.

Respondents: Seth G. Parker, Vice President, Levitan & Associates, Inc. and
Fred S. Hashway, Director of Government Affairs and Policy, RIEDC

Date: July 29, 2010