

August 3, 2010

Via Electronic Mail and Hand Delivery

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

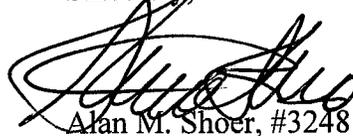
Re: **Docket 4185 - Review of Amended Power Purchase Agreement Between
Narragansett Electric Company d/b/a National Grid and Deepwater Wind
Block Island, LLC Pursuant to R.I. Gen. Laws § 39-26.1-7**

Dear Luly:

Enclosed please find an original and twelve (12) copies of Rhode Island Economic Development Corporation's Objection to Ocean State Research Institute's Motion to Strike Testimony.

Thank you for your attention to this filing

Sincerely,



Alan M. Shoer, #3248

Enclosures

cc: Service List in Docket 4185 via electronic mail

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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

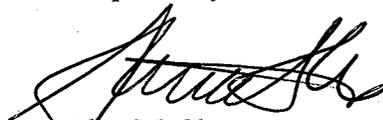
**OBJECTION OF RHODE ISLAND ECONOMIC DEVELOPMENT CORPORATION
TO OCEAN STATE RESEARCH INSTITUTE'S MOTION TO STRIKE TESTIMONY**

The Rhode Island Economic Development Corporation ("RIEDC") objects to the Motion filed on August 3, 2010 by the Ocean State Policy Research Institute ("OSPRI"). The OSPRI Motion appears as a generic motion to strike testimony ("any testimony") concerning other off-shore wind projects, but fails to even identify the pre-filed or rebuttal testimony of any party on these matters. The OSPRI Motion is merely just another attempt to challenge the substance of the RIEDC Advisory Opinion and to manipulate the reasons why the RIEDC Advisory Opinion examined the potential for other off-shore wind development; however, the RIEDC's Advisory Opinion is certainly not "testimony" in this proceeding, and for this reason alone the Motion has no basis for further consideration.

To the extent the OSPRI Motion seeks to force the Commission to strike portions of the RIEDC Advisory Opinion the Motion also fails because the RIEDC Letter and attached analysis of Levitan & Associates represents the required opinion filed pursuant to RIGL 39-26.1-7(c)(iv), which is to be reviewed in its entirety by the Commission with the "substantial deference" described in the statute. Moreover, the RIEDC Advisory Opinion refers to the RI Sound project (and other potential long term prospects) merely as further examples of the economic development benefits that can be realized from the Block Island Wind project, and only after a detailed analysis of the economic benefits from just the Block Island Wind project alone. When reviewed in its entirety the RIEDC Opinion comports with the requirements of the statute as a review of the economic development benefits of the project that is the subject of the amended PPA.

For these reasons the RIEDC objects to the OSPRI Motion to Strike Testimony.

Respectfully Submitted,



Alan M. Shoer
Counsel to the RIEDC