

July 23, 2010

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 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
National Grid Data Requests to The Citizen Interveners Group (Set 1)**

Dear Ms. Massaro:

Enclosed please find an original and twelve (12) copies of National Grid's¹ First of Data Requests to The Citizen Interveners Group in the above-captioned proceeding.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosure

cc: Docket 4185 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or "the Company").

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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

**National Grid's¹ First Set of Data Requests to
The Citizen Interveners Group**

(Issued July 23, 2010)

- 1-1 Please provide electronic copies of all documents (whether electronic or hard copy) that were relied upon by Mr. McCullough for any of the opinions offered in his testimony.
- 1-2 Please provide electronic copies of all of Mr. McCullough's workpapers utilized in the development of his testimony, including without limitation any spreadsheets used to perform any calculations.
- 1-3 Please identify any studies performed by Mr. McCullough or anyone working under his supervision that were relied upon by Mr. McCullough in forming his opinions expressed in his testimony.
- 1-4 Referring to pages 8-9 of Mr. McCullough's testimony, please explain what Mr. McCullough means when he offers the opinion that the evaluation of the project should have been subject to National Grid's avoided cost filing? What steps, in his opinion, should National Grid have taken to make its evaluation "subject to" its avoided cost filing?
- 1-5 Referring to page 24 of Mr. McCullough's testimony, lines 15 through 20, please identify all of the material contingencies against which he believes National Grid should have been protecting through the credit support terms.

¹ Submitted on behalf of The Narragansett Electric Company d/b/a National Grid.