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July 13, 2010

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

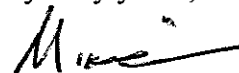
Re: Docket No. 4185

Dear Luly:

Enclosed for filing in this matter are the 1st set of data requests to National Grid from Toray Plastics (America), Inc. and Polytop Corporation.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg
cc: Service List

Toray Plastics/Massaro4

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.G.L. § 39-26.1-7 :

TORAY PLASTICS (AMERICA), INC. AND POLYTOP CORPORATION FIRST SET OF
DATA REQUESTS TO NATIONAL GRID

- 1-1. Please separately provide the annual impact (showing the monthly cost) and life of the contract impact of the amended PPA (plus the transmission line from Block Island to the mainland) for Toray Plastics (America), Inc. (Toray) and Polytop Corporation (Polytop), to include all meters associated with Toray and Polytop.
- 1-2.
 - a. Do you concede that the first year impact on distribution rates to Toray will be approximately \$287,000 and that over the 20-year term of the contract the impact on Toray's distribution rates will be approximately \$7.4 million? If not, please explain why you do not concede this impact and your understanding of what the impact will be on an annual basis and over the life of the contract.
 - b. Do you concede that the first year impact on distribution rates to Polytop will be approximately \$42,000 and that over the 20-year term of the contract the impact on Toray and Polytop's distribution rates will be approximately \$880,000? If not, please explain why you do not concede this impact and your understanding of what the impact will be on an annual basis and over the life of the contract.
- 1-3. Do you concede that for the additional dollars which would be paid by Toray and Polytop if the PPA is approved that the Toray and Polytop will receive the exact same distribution services from National Grid that they are currently receiving and that the payment of the additional sums through distribution rates will result in no additional distribution service benefits of any kind to Toray and Polytop or other similarly situated companies? If you do not so concede, please explain why.
- 1-4. Do you concede that the impact on Toray and Polytop and other similarly situated companies will not be reflected in the energy charge for electricity used by Toray and Polytop or other similarly situated companies, but will be charged to Toray and Polytop and all other similarly situated companies through a uniform fully reconciling annual factor in distribution rates subject to review and approval of

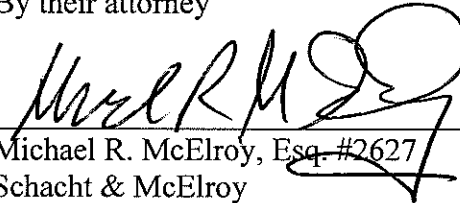
the Commission as provided by R.I.G.L. § 39-26.1-5(f)? If you do not so concede, please explain why.

- 1-5. Do you concede that National Grid will be entitled to financial remunerations and incentives in the form of annual compensation equal to 2.75% of the actual annual payments made under the PPA as provided in R.I.G.L. § 36-26.1-4? If you do not so concede, please explain why.
- 1-6. Do you concede that Deepwater Wind will have the opportunity to earn a profit on this project? If you do not so concede, please explain why. What is your best estimate of that profit over the life of the PPA?
- 1-7. Do you concede that Toray and Polytop and other similar situated companies will be paying more for distribution services from National Grid, but will not be financially benefiting from the PPA? If you do not so concede, please explain why.
- 1-8. Please explain your understanding of the rationale behind Deepwater Wind retaining half of the benefit if more wind than anticipated by the parties to the PPA is available pursuant to the wind out performance adjustment credit. Please explain why (if you so contend) all of the benefit from the excess wind should not benefit the ratepayers 100% in the same manner that all of the cost savings are required to benefit the ratepayers 100%.
- 1-9. Please explain why, if you so contend, you feel the PPA is commercially reasonable when it imposes substantial additional annual and 20-year distribution costs on Toray and Polytop and similarly situated companies who receive no financial or other benefits from these payments.
- 1-10. Please explain why, if you so contend, that the requirements of R.I.G.L. § 39-26.1-7(e), which states that “all realized savings [shall be] allocated to the benefit of ratepayers” and “any realized savings shall reduce such price” do not require that 100% of the savings generated by wind resources in excess of that anticipated in the PPA are not required to accrue 100% to the benefit of ratepayers. Please explain why, if you so contend, the wind out performance adjustment credit, which apportions only 50% of the benefit to the ratepayers, complies with the law.
- 1-11. Please explain how you believe that the PPA will facilitate new and existing business expansion for Toray and Polytop and other similarly situated businesses.
- 1-12. Do you concede that the impact of substantial distribution electricity price increases to Toray and Polytop and other similarly situated businesses is likely to discourage new and existing business expansion for Toray and Polytop and other similarly situated businesses? If not, please explain why.

- 1-13. Please explain how you feel that the PPA, with its financial impact on Toray and other similarly situated businesses located at the Quonset Business Park, will encourage further development of those businesses or will discourage further development of those businesses and explain your reasoning.
- 1-14. Please explain how many new full time, permanent jobs will be created by the PPA related solely to the Town of New Shoreham project.
- 1-15. Please provide any information you have regarding the federal grants totaling more than \$22 million awarded to the state to support improvements to the port facilities in Quonset Point. In particular, please provide any and all grant applications as well as any and all grant awards and identify what portion, if any, of those grants are earmarked for port improvements related solely to the Town of New Shoreham project.
- 1-16. Please provide any information you have regarding federal grants totaling more than \$3.7 million awarded to the state for federal work force training and new energy related jobs. In particular, please provide any and all grant applications as well as any and all grant awards and identify what portion, if any, of those grants are earmarked solely for training related to the Town of New Shoreham project.
- 1-17. Please provide any information you have, including any and all supporting documentation, that identifies any interest shown by any of the world's largest manufacturing companies regarding locating factories in Rhode Island for wind turbine assembly or submarine cable manufacturer or related business activities.
- 1-18. Please explain how the Town of New Shoreham project will create new direct jobs.
- 1-19. Please explain how the Town of New Shoreham project will have a multiplier effect on the local economy.
- 1-20. Please explain and provide any documentation for Deepwater Wind's claim in its letter of July 1, 2010 to the RI Public Utilities Commission that approximately 105,000 mwh of electricity produced by the Block Island wind farm will allegedly displace an equivalent amount of electric energy from both (a) the inefficient diesels now supplying Block Island, and (b) the least efficient and costly to operate conventional generating units operating on the margin in the regional generating system. Please provide supporting backup for these claims to the extent it exists.
- 1-21. Please provide any information, including documentation you have, that indicates that there will be indirect economic benefits in the form of wholesale electric price suppression effects as a result of the Town of New Shoreham project.

- 1-22. Please quantify and provide any supporting information if any exists if you claim that the Town of New Shoreham project will create direct economic benefits by reducing the emission of particulates, NOx, SO₂, CO₂.
- 1-23. Have you polled or otherwise surveyed or studied commercial and industrial users of electricity in Rhode Island to determine what the whether the impact of the distribution rate increases will have a positive or a negative effect on facilitating new and existing business expansion and/or provide other economic development benefits? If so, please provide the results of any such studies. If not, please explain why no such studies have been performed.

Respectfully submitted,
TORAY PLASTICS (AMERICA), INC. and
POLYTOP CORPORATION
By their attorney



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Date: July 13, 2010

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July, 2010, I sent a true copy of the foregoing to the attached service list.


Theresa M. Gallo

Toray/Data Requests to National Grid

**National Grid – Review of Proposed Town of New Shoreham Project
Docket No. 4185 – Service List Updated 7/12/10**

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