

**BCR**

**Benjamin C. Riggs, Jr.**  
**15D Harrington Street**  
**Newport, RI 02840**  
**Tel. 401/846-2540 Fax. 846-1032**  
[rmcriggs@earthlink.net](mailto:rmcriggs@earthlink.net)

July 31, 2010

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

RE: PUBLIC COMMENT ADDENDUM  
Review of (Revised) Proposed Town of New Shoreham Project  
Pursuant to RI General Laws §39-26.1-7, PUC Docket No. 4185

I am writing to supplement my prior comments on Docket No. 4185 due to subsequent responses to Data Requests that are relevant to subjects that were raised in my letter.

Decommissioning Costs: DWW's response to the PUC's 5<sup>th</sup> Set confirms that there is no factual support for their choice of \$10 million as a decommissioning cost estimate. In fact, their description of the potential work involved suggests it will be far more. This confirms that the \$1.8 million guarantee in the PPA is insufficient.

DOE Loan Guarantee: This response to the PUC's 5<sup>th</sup> Set confirms that the entire risk for the non-equity portion of this project (estimated at up to 80% of \$205 million) will be borne by the U.S. taxpayers, which includes Rhode Islanders.

Quonset Point: The RIEDC's response to the PUC's 1<sup>st</sup> Set was not responsive to question no. 1, which seems to indicate that they don't want to reveal why Cape Wind had no interest in Quonset. The response to no.s 2 & 3, that there was sufficient land available for a wind farm competitor like Cape Wind to locate there, is inconsistent with the information I received by telephone from Quonset's Managing Director, Steven King, a few weeks ago. Mr. King characterized DWW's option as being "de factor exclusive" because of the locations and limited access of remaining available land. He also confirmed that Cape Wind had paid a visit there, but had shifted its interest to New Bedford. In other words, this project will actually reduce the potential for use of Quonset for anyone other than DWW. Finally, in response to no. 4, the RIEDC points to expressions of interest by 3 companies, Mitsubishi, XEMC, and JDR. Perusal of the letters they have submitted directly to the PUC reveals their interest, if any, to be vague and speculative at best. Further, the ones from Mitsubishi and JDR appear to have been drafted by the same person, which is suggestive of the motive and source.

Job Creation: The RIEDC's response to the RIAG's 1<sup>st</sup> Set is non-responsive, and quite disturbing. If it isn't the RIEDC's responsibility to have statistics on job growth in Rhode Island, I wonder what we are funding them for. As for their response to the RIAG's 2<sup>nd</sup> Set, they offer no concrete support whatsoever for their contention that this project would create jobs. They apparently think Rhode Island ratepayers should spend \$390 million and assume unspecified future liabilities on pure speculation. And their response to OSPRI's 1<sup>st</sup> Set further indicates they have no additional evidence to offer of any kind that this project will create interest by any other companies to locate here.

For the reasons stated above, I again urge the commission to reject the revised contract offered by Deepwater Wind and National Grid. This revised PPA does not satisfy the purpose of §39-26.1-7, as restated or otherwise. It also does not satisfy the commercial reasonableness requirements, it does not meet energy and economic policy goals, it will not create jobs in Rhode Island, and it is clearly not in the public interest.

Thank you for your consideration.

SS// *Benjamin C. Riggs, Jr.*  
Benjamin C. Riggs, Jr.  
Newport

Cc: Service List (by electronic transmission)