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July 22, 2010

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

Re: Docket No. 4185/Review of Proposed Town of New Shoreham Project

Dear Luly:

Attached is an original and twelve (12) copies of the Town of New Shoreham's First Set of Information Requests to RIEDC regarding the pre-filed testimony of Seth Parker.

Copies of the enclosed Information Requests are being emailed to the service list.

Thank you for your assistance.

Sincerely yours,



Alan D. Mandl, Bar No. 6590

Enclosures
cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF PROPOSED :
TOWN OF NEW SHOREHAM :
PROJECT PURSUANT TO : DOCKET NO. 4185
R.I. GEN. LAWS § 39-26.1-7 :

TOWN OF NEW SHOREHAM’S FIRST SET OF DATA REQUESTS TO
THE RHODE ISLAND ECONOMIC DEVELOPMENT CORPORATION PERTAINING TO
THE PRE-FILED TESTIMONY OF SETH PARKER
(Issued July 22, 2010)

- TOWN-1 Please identify each owner, officer or employee of Block Island Power Company (“BIPCO”) with whom Mr. Parker communicated in preparing and prior to filing his testimony. Provide the substance of each communication and any documentation or factual information received from BIPCO and used in your testimony.
- TOWN-2 Please refer to page 12, lines 5-6 and page 35, lines 12-14 of Mr. Parker’s testimony. From whom did Mr. Parker obtain an understanding that BIPCO intends to put all of its diesels in a standby mode if BIPCO interconnects its system to Project transmission facilities and is capable of purchasing power from the mainland? Provide all information, written and oral, upon which Mr. Parker’s understanding is based, and the source(s) of such information.
- TOWN-3 Prior to filing his testimony, did Mr. Parker review the facilities needed to interconnect the BIPCO system to Project transmission facilities; and (b) the estimated cost of such facilities? To the extent reviewed by Mr. Parker, please identify (a) the facilities needed to interconnect the BIPCO system to Project transmission facilities; and (b) the estimated cost of such facilities.
- TOWN-4 In citing CRA conclusions on energy price suppression benefits of the Project and annual BIPCO ratepayer economic benefits that potentially may be derived from the cable to the mainland, as shown on pages 37-38 of Mr. Parker’s testimony, please state whether CRA took into account: (a) transmission facility charges billed to the owner and passed through by BIPCO to its customers; (b) the annual revenue requirements associated with the interconnection between the BIPCO system and the Project transmission facilities; (c) line losses on the BIPCO distribution system; (d) whether the current BIPCO distribution system is adequate to carry the projected BIPCO load growth; and (e) revenue requirements associated with maintaining all BIPCO diesels in standby mode.
- TOWN-5 Please refer to page 11 of Mr. Parker’s testimony. Please confirm Mr. Parker’s understanding that the revenue requirements associated with the interconnection

of the BIPCO system to Project transmission facilities are not covered under amended PPA charges or charges imposed by the transmission owner for Project transmission facilities.