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September 17, 2013

## BY EMAIL AND FEDERAL EXPRESS

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

Re: REVIEW INTO THE ADEQUACY OF RENEWABLE ENERGY SUPPLIES

PURSUANT TO R.I.G.L. § 39-26-6

DOCKET NO. 4404

Dear Ms. Massaro:

ISO New England Inc. (the "ISO") has received discovery requests by the Conservation Law Foundation ("CLF") in Docket No. 4404. The ISO made an informational presentation in this docket at the request of the Rhode Island Public Utilities Commission (the "Commission"). The ISO is not a party to this proceeding and is not subject to discovery. The Commission's Rules of Practice and Procedure sections 1.18(a) and 1.18(c)(2) make it clear that discovery is contemplated to apply to parties to the proceeding. Therefore, the ISO respectfully declines to respond to CLF's discovery requests.

Please call me if there are any questions.

Erica P. Bigelow

R.I. Bar #6584

Sîncerely.

Enclosure

cc: Cynthia Wilson-Frias, Esq.,

Jerry Elmer, Esq. (via e-mail) Kevin Flynn, Esq. (via e-mail)

Service List (Dkt. 4404) (via e-mail)

ALLIANCE OF LAW FIRMS

## STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

## PUBLIC UTILITIES COMMISSION

**DOCKET No. 4404** 

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of Section 1.7 of the Public Utilities Commission's Rules of Practice and Procedure.

Dated at Boston, Massachusetts this 17<sup>th</sup> day of September, 2013.

Erica P. Bigelow

Counsel

Of Counsel for ISO New England, Inc.