

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: HEXAGON ENERGY, LLC)

Docket No. 5060

**HEXAGON ENERGY, LLC'S
RESPONSE TO
DIVISION'S DATA REQUESTS (2nd SET)**

(SEPTEMBER 9, 2020)

Hexagon Energy, LLC objects to each data request in the Division's second set. None of the requests are relevant to the issue in dispute, nor are any of the requests designed to lead to the discovery of evidence probative to this matter. The requests appear to be specifically designed to delay Hexagon's capacity to participate in the current Renewable Energy Growth ("REG") enrollment despite Hexagon's entitlement to participate as a matter of law.

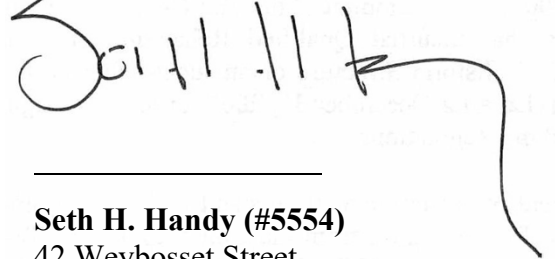
The issue under consideration in this docket is not disputed by National Grid as made clear by its comments. Nevertheless, so far, Hexagon has been forced to respond to data requests from both the Division and the Commission (neither of which were designed to lead to evidence probative of the matter in dispute) and to produce two sets of pre-filed testimony. Hexagon asks the Commission to promptly rule on this Petition so as to enable Hexagon's participation in the current REG enrollment. Moreover, as sanctions, Hexagon asks the Commission to award it any

attorneys' fees incurred in association with this motion.

HEXAGON ENERGY, LLC

By their attorneys,

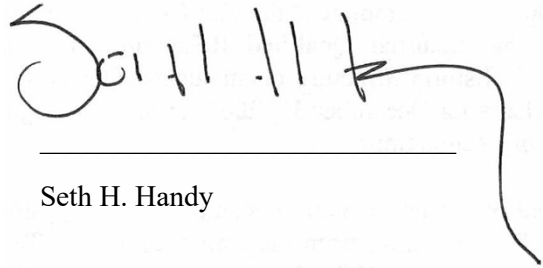
HANDY LAW, LLC

A handwritten signature in black ink, appearing to read "Seth H. Handy", with a long, sweeping underline that extends to the right.

Seth H. Handy (#5554)
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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, I delivered a true copy of the foregoing document to the service list by electronic mail.

A handwritten signature in black ink, appearing to read "Seth H. Handy", with a long, sweeping underline that extends to the right.

Seth H. Handy