

**STATE OF RHODE ISLAND & PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

**IN RE: JOINT PETITION OF THE NARRAGANSETT)
 ELECTRIC COMPANY AND SOUTHERN) Docket D-06-13
 UNION COMPANY FOR APPROVAL OF)
 PURCHASE AND SALE OF ASSETS)**

**MOTION TO COMPEL RESPONSES TO RIDEM’S FIRST SET OF DATA REQUESTS
DIRECTED TO SOUTHERN UNION COMPANY**

The Rhode Island Department of Environmental Management (“RIDEM”) hereby moves to compel the Southern Union Company to respond to Data Requests 1-4 through 1-12.

RIDEM Data Requests 1-4, 1-5 and 1-6

Data requests 1-4 and 1-5 seek important information regarding Southern Union’s relationships with other businesses that are connected to Southern Union through various factors of ownership or control. RIDEM believes that the requested information regarding Southern Union’s business relationships is highly relevant to determining issues related to potential liability and the ownership, location and availability of and accessibility to assets to pay for a clean up in Tiverton, Rhode Island. Once these business relationships have been identified, data request 1-6 seeks to identify any assets owned by those entities that may exist within the State of Rhode Island that could be readily available to the jurisdiction of the Rhode Island courts should the need arise. With respect to Southern Union’s response to data request 1-6, RIDEM requests that Southern Union provide RIDEM with a copy of the Purchase and Sale agreement. To the extent that the “Assets” identified in the Purchase & Sale Agreement represent **all** of the assets for which information is sought by data request 1-6, then the Purchase and Sale Agreement may constitute an adequate response.

RIDEM Data Requests 1-7 through 1-11

Data requests 1-7 through 1-11 seek important information regarding Southern Union’s financial relationships with related entities. This information is important to evaluate whether these entities are in fact operated as separate and distinct entities or whether they are corporate alter-egos for Southern Union that are being used to selectively shield corporate assets from potential liabilities such as the contamination in Tiverton, Rhode Island.

DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT,
By its attorney,

Brian A. Wagner (#4033)
DEM – Office of Legal Services
235 Promenade Street, 4th Floor
Providence, RI 02908
Tel: (401) 222-6607
Fax: (401) 222-3378
E-mail: brian.wagner@dem.ri.gov

CERTIFICATE OF SERVICE

I certify that on the ___ day of _____, 2006, a copy of the within Motion to Compel More Sufficient Responses to RIDEM's Data Requests were forwarded to:

Name/Address	E-mail Distribution	Phone/FAX
For Narragansett Electric Co. d/b/a National Grid		
Laura S. Olton, General Counsel Narragansett Electric Co. d/b/a National Grid 280 Melrose Street Providence, RI 02907	laura.olton@us.ngrid.com	401-784-7667
	Joanne.scanlon@us.ngrid.com	401-784-4321
Thomas G. Robinson, Esq. Narragansett Electric Co. d/b/a National Grid 25 Research Drive Westborough, MA 01582	Thomas.robinson@us.ngrid.com	508-389-2877
	Ronald.Gerwatowski@us.ngrid.com	
For New England Gas Co.		
For New England Gas Co.: Cheryl Kimball, Esq. Keegan Werlin LLP 265 Franklin St. Boston, MA 02110	ckimball@keeganwerlin.com	617-951-1400 617-951-1354
	Rkeegan@keeganwerlin.com	
Kevin Penders, Esq. Manager, Regulatory Relations New England Gas Co. 100 Weybosset St. Providence, RI 02903	Kevin.Penders@negasco.com	401-272-5040 401-751-0698

RE: *Joint Petition of the Narragansett Electric and Southern Union Companies, Docket No. D-06-13*
RIDEM's Motion to Compel

Gerald J. Petros, Esq. Hinckley, Allen & Snyder LLP 1500 Fleet Center Providence, RI 02903	gpetros@haslaw.com	401-274-2000 ext. 5666 401-277-9600
For the Division of Public Utilities Advocacy: Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	lwold@riag.ri.gov	401-222-2424 401-222-3016
	RDIMeglio@riag.ri.gov	
	sscialabba@ripuc.state.ri.us	
For the Dept. of Attorney General: Paul Roberti, Esq. William Lueker, Esq. Dept. of Attorney General 150 South Main Street Providence, RI 02903	Wlueker@riag.ri.gov	401-222-2424 401-222-3016
	Proberti@riag.ri.gov	
For the Town of Tiverton: Andrew M. Teitz, Esq. Ursillo, Teitz and Rich, Ltd. 2 Williams St. Providence, RI 02903-2918	zoning@utrlaw.com	401-331-2222 401-751-5257
	jeannescott@utrlaw.com	
For the George Wiley Center: B. Jean Rosiello, Esq. 340 Olney St. Providence, RI 02906	jeanrosiello@cox.net	401-751-5090 401-751-5096
For the City of Providence, RI: Adrienne G. Southgate, Deputy City Solicitor Law Department City of Providence 275 Westminster Street, Suite 200 Providence, RI 02903	asouthgate@providenceri.com	401- 421-7740 Ext. 333
John Spirito, Esq. Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	jspirito@ripuc.state.ri.us	401-780-2152 401-941-9207
For Division of Public Utilities Advocacy:		
Bruce Oliver Revalo Hill Associates 7103 Laketree Drive Fairfax Station VA 22039	Boliver@cox.net	
David J. Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djefron@aol.com	

***RE: Joint Petition of the Narragansett Electric and Southern Union Companies, Docket No. D-06-13
RIDEM's Motion to Compel***

File an original & four (4) copies w/: Luly E. Massaro, Division Clerk Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	Lmassaro@puc.state.ri.us	401-780-2107 401-941-1691
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By e-mail and by regular mail postage pre-paid.
