



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Peter F. Kilmartin, Attorney General

March 10, 2011

Luly Massaro, Clerk
Division of Public Utilities and Carriers
89 Jefferson Blvd.
Warwick, RI 02888

**RE: COMPLAINT OF BENJAMIN RIGGS RELATING TO TOWN OF
PORTSMOUTH GENERATOR FACILITY – NET METERING**
DOCKET No. D-10-126

Dear Ms. Massaro,

Enclosed for filing with the Division on behalf of the Advocacy Section is an original and three (3) copies of the Advocacy Section's Response to Request for Continuance in the above captioned matter.

Very truly yours,

Jon Hagopian
Special Assistant Attorney General

JGH/dmm

Encls.

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

IN RE: COMPLAINT OF BENJAMIN :
RIGGS RELATING TO : **DOCKET No. D-10-126**
TOWN OF PORTSMOUTH GENERATOR :
FACILITY – NET METERING :

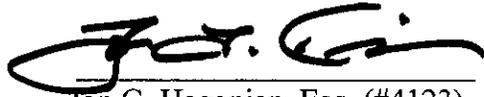
**ADVOCACY SECTION OF THE DIVISION OF
PUBLIC UTILITIES AND CARRIERS
RESPONSE TO REQUEST FOR CONTINUANCE
OF THE TOWN OF PORTSMOUTH AND
THE WASHINGTON COUNTY REGIONAL PLANNING COUNCIL**

Now comes the Advocacy Section of the Division of Public Utilities and Carriers (the “Advocacy Section”) and hereby submits the following response to the Motion for Continuance of the Town of Portsmouth (the “Town”) and the Washington County Regional Planning Council (the “Planning Council”). The Advocacy Section has no objection to the continuance, however it seeks to ensure that the scope of discovery and the proceeding be confined to the issues set forth in the Complaint of Benjamin Riggs (the “Complaint”) and the issue of whether the transaction entered into by Portsmouth and National Grid and the purchase of energy complies with the approved tariff and the applicable law which govern such arrangements.

The Advocacy Section seeks a prehearing conference as soon as practicable to establish the scope of these proceedings and discovery.

Thomas Ahern, Administrator
State of Rhode Island
Division of Public Utilities and
Carriers

By his attorney,



Jon G. Hagopian, Esq. (#4123)
Special Assistant Attorney General
State of Rhode Island
Department of Attorney General
150 South Main Street
Providence, R.I. 02903
Tel.: 401-274-4400

Dated: March 10, 2011

CERTIFICATION OF SERVICE

I hereby certify that on the 10th day of March, 2011, that I transmitted an electronic copy of the within Data Requests to the attached service list and to Luly Massaro, Division Clerk via electronic mail and regular mail.



Docket No. D-10-126 Complaint of Benjamin Riggs Updated 10/4/10

| Parties/Address | E-mail Distribution | Phone |
|--|--|------------------------------|
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| | Joanne.scanlon@us.ngrid.com | |
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