



Laura S. Olton  
General Counsel

November 22, 2004

**VIA HAND DELIVERY & ELECTRONIC**

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

**RE: Docket 3643 – In re: Complaint Regarding Line Extension Rates  
Opposition to Motion to Depose**

Dear Ms. Massaro:

Narragansett Electric Company (“Narragansett Electric” or “Company”) hereby opposes Scott Pollard’s November 15, 2004 motion to depose numerous Company employees on December 1, 2004 on the grounds that the motion is premature. Under Rule 1.16 of the Commission’s Rules of Practice and Procedure, the Commission shall set a date for a pre-hearing conference to establish, among other matters, a discovery schedule. The Commission has yet to hold a pre-hearing conference. If, after ruling on the Company’s motion (which is set for discussion at the Open Meeting on November 23, 2004), the Commission decides to move forward with this docket, the Commission will establish a pre-hearing conference date. At such pre-hearing conference, the Commission can establish a discovery schedule, including dates for depositions. Accordingly, Narragansett Electric respectfully requests that the motion to depose be denied.

Thank you for your consideration of this filing. If you have any questions, please do not hesitate to call me at (401) 784-7667.

Very truly yours,

Laura S. Olton

cc: Scott Pollard, Esq.  
Cindy Wilson, Esq., Public Utilities Commission

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