

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC

Docket No.

**RESPONSE OF CITY OF CRANSTON TO APPEAL OF
NARRAGANSETT ELECTRIC COMPANY**

1. No response is required.

JURISDICTION AND FACTS

2. Neither denied nor admitted; Petitioner is left to its proof.
3. Neither denied nor admitted; Petitioner is left to its proof.
4. Admit
5. Admit.
6. Neither denied nor admitted; Petitioner is left to its proof.
7. No response is required as the Amendment speaks for itself.
8. No response is required as the Amendment speaks for itself.

LEGAL CLAIMS

9. No response is required as this allegation states a legal conclusion.
10. No response is required as this allegation states a legal conclusion.
11. No response is required as this allegation states a legal conclusion.
12. Denied.
13. Denied.
14. Denied.

15. No response is required to the first sent to this allegation; neither denied nor admitted with respect to the second sentence of this allegation.

16. Denied.

17. No response required.

WHEREFORE, the City of Cranston requests that the appeal of Narragansett Electric Company be denied and dismissed and that it be awarded costs thereon.

Petitioner, City of Cranston
By and through its Attorney,

//s// John M. Verdecchia

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AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Petitioner have failed to state a claim against the City of Cranston for which relief can be granted.

The City hereby reserves the right to supplement its affirmative defenses.

Petitioner, City of Cranston
By and through its Attorney,

//s// John M. Verdecchia

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CERTIFICATION

I hereby certify that I electronically served this document to George W. Watson, III, Esq., (gwatson@rc.com); One Financial Plaza, 14th Floor, Providence, Rhode Island 03903, Patricia S. Lucarelli, Esq., (Patricia.lucarelli@puc.ri.gov); Administrative and Legal Support Services Administrator, Rhode Island Public Utilities Commission, 89 Jefferson Blvd., Warwick, Rhode Island 02888 on this 25th day of August, 2023.

//s// Natasha F. Mieses