

**Rhode Island Economic Development Corporation's Responses to
the Town of New Shoreham's First Set of Data Requests
Pertaining to the Pre-Filed Testimony of Seth Parker
Date Issued: July 22, 2010**

Docket No.: 4185

REQUEST TOWN 1-1:

Please identify each owner, officer or employee of Block Island Power Company ("BIPCO") with whom Mr. Parker communicated in preparing and prior to filing his testimony. Provide the substance of each communication and any documentation or factual information received from BIPCO and used in your testimony.

EDC RESPONSE 1-1:

Mr. Parker received historical BIPCO load data from Cliff McGinnes, VP of BIPCO, the data received is attached to this Data Response.

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

Date: July 29, 2010

KWH	1997	1998	1999	2000	2001	2002	2003
JAN	421,763	443,888	435,296	536,247	516,583	526,433	611,960
FEB	373,148	454,454	411,844	493,378	488,345	492,644	668,424
MAR	481,024	420,420	473,979	488,975	605,368	573,189	570,521
APR	466,718	455,692	513,059	608,622	561,207	581,918	638,371
MAY	610,468	711,823	749,127	712,275	739,634	764,112	772,344
JUNE	899,833	868,467	945,883	905,336	929,149	1,100,669	1,060,102
JULY	1,172,783	1,189,401	1,424,673	1,309,520	1,438,630	1,436,794	1,520,693
AUG	1,078,334	1,326,597	1,271,403	1,374,147	1,415,539	1,439,322	1,732,706
SEPT	935,646	900,840	944,171	935,979	1,081,550	1,145,776	923,866
OCT	629,943	714,228	731,315	725,164	709,151	753,367	768,801
NOV	529,027	462,011	529,166	553,610	518,395	672,201	653,732
DEC	439,334	540,443	597,072	616,172	615,880	635,703	599,854
	8,018,021	8,488,264	9,026,978	9,259,425	9,619,431	10,122,138	10,521,373
	2004	2005	2006	2007	2008	2009	2010
JAN	811,920	667,869	674,128	614,164	622,428	645,023	676,475
FEB	574,613	555,671	569,098	624,369	564,593	613,742	554,969
MAR	574,925	639,049	590,877	587,775	630,606	566,755	575,749
APR	631,382	688,454	650,657	724,746	624,720	618,950	568,096
MAY	826,462	782,227	832,395	853,566	758,961	838,995	851,584
JUNE	1,073,208	1,101,384	1,071,364	1,086,257	1,161,035	988,795	1,050,661
JULY	1,680,308	1,738,890	1,739,873	1,618,789	1,657,403	1,428,085	
AUG	1,536,886	1,664,250	1,708,289	1,587,614	1,431,057	1,694,293	
SEPT	1,082,416	1,125,177	1,134,070	1,280,665	1,157,132	1,074,759	
OCT	829,745	841,528	740,574	805,653	745,395	762,382	
NOV	596,284	611,967	607,834	619,799	659,893	554,873	
DEC	619,687	620,142	671,924	671,619	599,426	582,607	
	10,837,836	11,036,608	10,991,083	11,075,016	10,612,649	10,369,259	4,277,534

	2004	2005	2006	2007	2008	2009	2010
JAN	0.0977	0.1378	0.1699	0.1762	0.2614	0.1582	0.2062
FEB	0.1016	0.1426	0.1779	0.1599	0.2548	0.1205	0.2066
MAR	0.1016	0.1462	0.1746	0.1857	0.2646	0.1480	0.2070
APR	0.0929	0.1563	0.1905	0.1782	0.3250	0.1422	0.2373
MAY	0.1098	0.1470	0.1937	0.1937	0.3211	0.1500	0.2206
JUNE	0.0969	0.1713	0.2101	0.2103	0.3708	0.1738	0.2135
JULY	0.1071	0.1689	0.2101	0.2310	0.3619	0.1756	
AUG	0.1151	0.1842	0.2202	0.2183	0.3278	0.1969	
SEPT	0.1149	0.2048	0.2166	0.2012	0.3019	0.1841	
OCT	0.1391	0.1963	0.1796	0.2353	0.2847	0.1832	
NOV	0.1376	0.1828	0.1861	0.2327	0.2389	0.2114	
DEC	0.1606	0.1693	0.1837	0.2807	0.2089	0.2089	

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REQUEST TOWN 1-2:

Please refer to page 12, lines 5-6 and page 35, lines 12-14 of Mr. Parker's testimony. From whom did Mr. Parker obtain an understanding that BIPCO intends to put all of its diesels in a standby mode if BIPCO interconnects its system to Project transmission facilities and is capable of purchasing power from the mainland? Provide all information, written and oral, upon which Mr. Parker's understanding is based, and the source(s) of such information.

EDC RESPONSE 1-2:

According to page 8 of the National Grid letter dated October 15, 2009, referenced on page 4 in the RI PUC Report and Order in Docket No. 4111, "Furthermore, Grid recognized that a transmission cable from Block Island to the mainland would allow Block Island Power Company ("BIPCO") to reduce or effectively eliminate the use of diesel generation on the island." On page 66 of the Report and Order, the Commission Findings included: "Third, there is also the likelihood that the Project will enhance the environmental quality of the Town of New Shoreham because there will be environmental improvement to the extent that BIPCO can utilize its existing diesel generators for back-up use only."

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

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REQUEST TOWN 1-3:

Prior to filing his testimony, did Mr. Parker review the facilities needed to interconnect the BIPCO system to Project transmission facilities; and (b) the estimated cost of such facilities? To the extent reviewed by Mr. Parker, please identify (a) the facilities needed to interconnect the BIPCO system to Project transmission facilities; and (b) the estimated cost of such facilities.

EDC RESPONSE 1-3:

The RIEDC objects to this data request based on the vagueness of the term "Project transmission facilities". Assuming that the term "Project transmission facilities" refers to the proposed transmission cable between Block Island and the mainland, Mr. Parker did not review the facilities needed to interconnect the BIPCO system to Project transmission facilities.

Respondent as to the Objection: Alan M. Shoer, Counsel to RIEDC

Respondent: Seth G. Parker, Vice President, Levitan & Associates, Inc.

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REQUEST TOWN 1-4:

In citing CRA conclusions on energy price suppression benefits of the Project and annual BIPCO ratepayer economic benefits that potentially may be derived from the cable to the mainland, as shown on pages 37-38 of Mr. Parker's testimony, please state whether CRA took into account: (a) transmission facility charges billed to the owner and passed through by BIPCO to its customers; (b) the annual revenue requirements associated with the interconnection between the BIPCO system and the Project transmission facilities; (c) line losses on the BIPCO distribution system; (d) whether the current BIPCO distribution system is adequate to carry the projected BIPCO load growth; and (e) revenue requirements associated with maintaining all BIPCO diesels in standby mode.

EDC RESPONSE 1-4:

The RIEDC objects to this data request based on the fact that CRA prepared the CRA Analysis and the Additional CRA Analysis referenced in Mr. Parker's Direct Testimony, and thus these questions should be directed to CRA.

Respondent as to Objection: Alan M. Shoer, Counsel to RIEDC

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REQUEST TOWN 1-5:

Please refer to page 11 of Mr. Parker's testimony. Please confirm Mr. Parker's understanding that the revenue requirements associated with the interconnection of the BIPCO system to Project transmission facilities are not covered under amended PPA charges or charges imposed by the transmission owner for Project transmission facilities.

EDC RESPONSE 1-5:

The RIEDC objects to this data request based on the vagueness of the term "Project transmission facilities". Assuming that the term "Project transmission facilities" refers to the proposed transmission cable between Block Island and the mainland, Mr. Parker stated his assumptions regarding any costs associated with the interconnection of the BIPCO system to Project transmission facilities on page 12, lines 2 - 3: "Therefore I did not include any costs associated with the Transmission Cable *or with possible upgrades to the BIPCO electrical system* as part of either the BIWF project of the Amended PPA." [italics added for emphasis]

Respondent as to the Objection: Alan M. Shoer, Counsel to RIEDC

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