

Dec 23 (6 days ago)

Ariel Arwen  
<arielarwen@gmail.com>

December 23, 2015

Dear Marcia,

I would like to request a full and nonredacted copy of Valley Green's response to Staff 3-10 (which incorporates Staff 1-2). You invoked rule PUC 203.08 as the basis for not furnishing me with the attachment to your response to that question, but nothing in the rule provides a basis for withholding this document from me.

I realize that this request is coming relatively late in the 15 business-day window before the Motion to Compel deadline (12/29/15), but similar to Valley Green's informal apology to Staff for late submission of responses to Set 3 Data Requests (due to Thanksgiving etc.) I was out with a week's flu, so I apologize for the small window of time.

With respect to the above-referenced discovery disputes, please treat this message as the "good faith effort" required of me under Rule 203.09, prior to the submission of a Motion to Compel Discovery.

Thank you for your assistance and best wishes to you for the holidays.

Sincerely,  
Ariel Arwen

-----

Dec 24 (5 days ago)

Marcia A. Brown  
<mab@rathlaw.com>

to me

I'm sorry you've been ill. I hope you continue to get well.

As you know, this is competitively sensitive information and we'll have to discuss this internally on how to give you access. What has been done in the past is to have a time when you can come to Concord, sign a confidentiality form, and review the spreadsheets in person. We could set that up for this docket.

*Best Regards,*

*Marcia*

**Marcia A. Brown**

Attorney-At-Law

-----

Dec 24 (5 days ago)

Ariel Arwen

<arielarwen@gmail.com>

Dear Marcia,

I notice that I mis-typed 203.08, so here is a corrected email.

Could you please send me a draft of your proposed confidentiality agreement? I don't see any basis in PUC 203.08 for limiting a party's access to a document to a supervised visual examination. Can you explain the basis for not responding to my request by sending a full and nonredacted copy of the response to Staff 3-10? The deadline for the Motion to Compel is Dec. 29, and I look forward to your response.

Sincerely,

Ariel Arwen

## Company

## Revenue Requirement

	Reference	2017	2021
Rate Base	Schedule-3		
Rate of Return	Schedule-4		
Income Required			
Net Operating Income	Schedule-2		
Operating Income Surplus/(Deficiency)			
Tax Effect			
<b>Revenue Surplus/(Deficiency)</b>			
Federal Income Tax Rate		34.00%	0.34
State Income Tax Rate		8.50%	0.085
Federal Benefit of State Income Tax		-2.89%	-0.0289
Northern Effective Tax Rate		39.61%	0.3961
Gross-Up Factor = 1/(1-effective tax rate)		1.6559	1.6559