

From: [Greenblatt, Jeffrey](#)
To: [Si Kinsella](#)
Subject: RE: IR Si Kinsella #32
Date: Friday, September 04, 2020 11:22:14 AM
Attachments: [image001.png](#)

Good Afternoon Mr. Kinsella,

In Si Kinsella #32 (2) you asked PSEG Long Island to “Please provide information and/or documentation in support of the number of responses received pursuant to the 2015 South Fork RFP including but not limited to their names and addresses.” Our response was “PSEG Long Island objects to this request on the grounds that it seeks confidential information that is neither relevant to, nor reasonably calculated to lead to, the discovery of admissible evidence in this Article VII proceeding.”

Yesterday we had a telephone conversation where you asked me if I could provide the names of the companies and the dates when they submitted the bids. I promised you I would reply with a response by COB today (September 4, 2020). In response to that second question, on December 2, 2015, 21 proposals were received from 16 entities. In response to your first question, there are at least 3 of those 16 entities that have been publicly identified, such as:

1. Applied Energy Group (implementation of a load reduction program);
2. Deepwater Wind South Fork, LLC (offshore wind farm); and
3. LI Energy System, LLC (battery storage in Montauk and East Hampton).

We are not providing you with a list of the other 13 entities that submitted bids on December 2, 2015. I understand that you may be asking for this information in a Motion to Compel; it is our position that this confidential information is neither relevant to, nor reasonably calculated to lead to, the discovery of admissible evidence in this Article VII proceeding.

Jeff

From: Si Kinsella <si@wainescott.life>
Sent: Thursday, September 03, 2020 2:37 PM
To: Greenblatt, Jeffrey <Jeffrey.Greenblatt@pseg.com>
Subject: [EXTERNAL] RE: IR Si Kinsella #32

Dear Mr. Greenblatt,

Are you available to speak on the telephone and attempt to resolve the issues PSEG LI raises in its response to IR Si Kinsella #32? My mobile number is 631-903-9154.

I look forward to speaking with you,

Si Kinsella

From: [Greenblatt, Jeffrey](#)
To: [Si Kinsella](#)
Subject: RE: IR Si Kinsella #32
Date: Thursday, September 03, 2020 2:42:25 PM
Attachments: [image001.png](#)

Sure, your cell phone was breaking up. Please call my cell phone (646) 552-2332.

From: Si Kinsella <si@wainscott.life>
Sent: Thursday, September 03, 2020 2:37 PM
To: Greenblatt, Jeffrey <Jeffrey.Greenblatt@pseg.com>
Subject: [EXTERNAL] RE: IR Si Kinsella #32

Dear Mr. Greenblatt,

Are you available to speak on the telephone and attempt to resolve the issues PSEG LI raises in its response to IR Si Kinsella #32? My mobile number is 631-903-9154.

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