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Also admitted in Massachusetts

September 13, 2022

**VIA HAND DELIVERY AND ELECTRONIC MAIL**

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

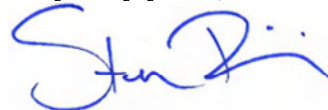
**RE: Docket 22-14-REG - Ecogy Energy, Inc.'s Petition for Dispute Resolution  
Agreed Upon Statement of Facts**

Dear Ms. Massaro:

Enclosed please find the Agreed Upon Statement of Facts on behalf of The Narragansett Electric Company d/b/a Rhode Island Energy and Ecogy Energy, Inc.

Thank you for your attention to this matter. If you have any questions, please call me at 401-709-3359.

Very truly yours,



Steven J. Boyajian

cc: Docket 22-14-REG Service List

**Ecogy Energy LLC- Petition for Dispute Resolution – Docket No. 22-14-REG  
Service List Updated 8/11/2022**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
<b>Ecogy Energy LLC (Ecogy)</b> Robert K. Taylor, Esq. Partridge Snow & Hahn LLP 40 Westminster Street, Suite 1100 Providence, RI 02903	<a href="mailto:ccapizzo@psh.com">ccapizzo@psh.com</a> ;	401-861-8200
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	<a href="mailto:rtaylor@psh.com">rtaylor@psh.com</a> ;	
	<a href="mailto:TCritchlow@psh.com">TCritchlow@psh.com</a> ;	
	<a href="mailto:AGiron@PSH.com">AGiron@PSH.com</a> ;	
<b>Narragansett Electric Co. d/b/a Rhode Island Energy</b>  Andrew Marcaccio, Esq. Celia O'Brien, Esq. 280 Melrose Street Providence, RI 02907  Steve Boyajian, Esq. Leticia Pimentel, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903	<a href="mailto:AMarcaccio@pplweb.com">AMarcaccio@pplweb.com</a> ;	401-784-4263
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	<a href="mailto:SBoyajian@rc.com">SBoyajian@rc.com</a> ;	
	<a href="mailto:Lpimentel@rc.com">Lpimentel@rc.com</a> ;	
<a href="mailto:HSeddon@rc.com">HSeddon@rc.com</a> ;		
<b>Division of Public Utilities</b> Margaret Hogan, Esq. 89 Jefferson Blvd. Warwick, RI 02888  Mike Brennan, Consultant	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ;	401-780-2120
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Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2017
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
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Office of Energy Resources Chris Kearns Shauna Beland  Laura Bartsch, Chair of DG Board	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
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**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

In Re:  
ECOZY ENERGY, INC.

Docket No. 22-14-REG

**AGREED UPON STATEMENT OF FACTS**

Ecogy Energy, Inc. (“Ecogy”) and The Narragansett Electric Company d/b/a Rhode Island Energy (“RI Energy”) have agreed on the following statement of facts:

1. Ecogy is a solar developer that operates in Rhode Island.
2. The Narragansett Electric Company d/b/a Rhode Island Energy is a gas and electric distribution company in Rhode Island. Rhode Island Energy’s parent company, PPL Rhode Island Holdings, LLC, acquired 100 percent of the outstanding shares of common stock of The Narragansett Electric Company from National Grid USA on May 25, 2022.
3. The policy objectives of the Renewable Energy Growth Program are intended to be effectuated through implementation of the statutes establishing and governing the Program and the rules and tariffs promulgated in accordance with such statutes.
4. Ecogy’s RI Projects are described accurately in paragraph 12 of the Petition.
5. In 2021 the Company offered potential COEs to Ecogy projects with the condition that the projects relinquish existing COEs.
6. The Company notified Ecogy that it was not eligible to participate in the 2022 First Open Enrollment because the Ecogy RI Projects had been awarded COEs in a prior enrollment round.

ECOGY ENERGY, INC.

THE NARRAGANSETT  
ELECTRIC COMPANY d/b/a  
RHODE ISLAND ENERGY

By Its Attorneys,

By Its Attorneys,

PARTRIDGE SNOW & HAHN LLP

ROBINSON & COLE LLP

/s/

\_\_\_\_\_  
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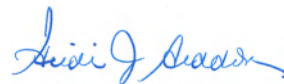
/s/

\_\_\_\_\_  
Steven J. Boyajian (#7263)  
Leticia C. Pimentel (#9332)  
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sboyajian@rc.com  
lpimentel@rc.com

DATED: September 13, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of September, 2022, I delivered a true copy of the foregoing Agreed Upon Statement of Material Facts via electronic mail to the parties on the Service List for Docket No. 22-14-REG.



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Heidi Seddon