

**VIA ELECTRONIC MAIL ONLY**

January 26, 2023

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

**RE: Docket No. 22-32-RES – In Re Sunwave USA Holdings Inc.’s Non-Compliance with the Rhode Island Renewable Energy Standard for Compliance Year 2021**

**Sunwave USA Holdings Inc.’s Motion to Reopen the Proceeding and Request a Reduction to the Penalty Imposed**

**Submission of Exhibit - Redacted and Unredacted Versions**

Dear Ms. Massaro:

I represent Sunwave USA Holdings Inc. (“Sunwave”) in this matter. Attached for the record is a receipt from RI Commerce showing payment of Sunwave’s 2021 Alternative Compliance Payment (“ACP”). The original of this receipt contains privileged information (check number). As such, I request that a redacted version of the receipt be entered in the record. This request is made pursuant to 810-RICR-00-00-1-1.3(H)(3) and R.I. Gen. Laws § 38-2-2(4)(B). Specifically, Sunwave seeks protection from public disclosure of the check number used to pay the ACP. This information constitutes commercial or financial information obtained from Sunwave that is of a privileged or confidential nature. Disclosure of this information is not the type of information typically made available to the public and its release could result in harm to Sunwave’s or Liberty Mutual Surety’s financial position by exposing banking information to the public.

Enclosed are both a redacted and unredacted version of the document. The unredacted version is labeled “Contains Privileged Information - Do Not Release.”

# Robinson+Cole

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Thank you for your attention to this matter. If you have any questions, please contact me at (860) 275-8359.

Sincerely,

A handwritten signature in blue ink that reads "John P. Casey". The signature is written in a cursive style with a large initial "J" and a distinct "P" and "C".

John P. Casey

Enclosure

cc: Docket 22-32-RES Service List (with redacted version only)

# RENEWABLE ENERGY FUND – ACP

RI Commerce Corporation  
315 Iron Horse Way, Suite 101  
Providence, RI 02908

Phone: 401.278.9100  
Fax: 401.273.8270

Seller's Name: Liberty Mutual / Sunwave USA Holdings

Amount Remitted: \$46,841.46

Date Remitted: 1/17/2023

On 1/17/2023 the Rhode Island Commerce Corporation Received check number [REDACTED] for the amount of \$46,841.46 from Liberty Mutual Surety on behalf of Sunwave USA Holdings for the Renewable Energy Fund-ACP.

If you have any questions, please contact Samantha Wood 401.278.9193  
[samantha.wood@commerceri.com](mailto:samantha.wood@commerceri.com).

**Certificate of Service**

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being sent via hand delivery to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



John P. Casey

January 26, 2023

Date

**Docket No. 22-32-RES – In Re Sunwave USA Holdings Inc.’s Non-Compliance with the Rhode Island Renewable Energy Standard for Compliance Year 2021 Service List as of 1/26/23**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
<b>Sunwave USA Holdings Inc.</b>  John P. Casey, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903	<a href="mailto:jcasey@rc.com">jcasey@rc.com</a>	401-709-3300
	<a href="mailto:dhorton@rc.com">dhorton@rc.com</a>	
<b>Division of Public Utilities &amp; Carriers on behalf of the Public Utilities Commission</b>  Gregory S. Schultz, Esq. Dept. of Attorney General 150 South Main Street Providence, RI 02903	<a href="mailto:gschultz@riag.ri.gov">gschultz@riag.ri.gov</a>	401-274-4400 x 2400
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