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November 29, 2023

VIA ELECTRONIC MAIL

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

RE: Docket No. 23-05-EL – The Narragansett Electric Company d/b/a Rhode Island Energy Tariff Advice to Amend the Net Metering Provision – Proposal for Administration of Excess Net Metering Credits
Rhode Island Energy Initial Brief

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Company”), enclosed is the Company’s initial brief in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosures

cc: Docket No. 23-05-EL Service List

Statute”) expressly assigns a value for renewable net metering credits and a different value for excess renewable net metering credits.¹ The Net Metering Statute also includes language to ease the administrative burden of the net metered accounts and stabilize net metered account bills (Joint Testimony of Russell Salk and Briggs at 10 (hereinafter, “Joint Testimony”)).² The Proposal is the Company’s proposed solution to the challenges associated with the administration, calculation, and recovery of net metering credits in a manner consistent with the Net Metering Statute.

The Company seeks Commission approval of an annual reconciliation process or “true up”³ that will result in more precise calculations and administration of renewable net metering credits and excess renewable net metering credits in an administratively efficient manner (*id.* at 11). To effectuate a more efficient net metering program, the Proposal, as updated through the Company’s response to Data Request PUC 4-2, includes revisions to the Net Metering Tariff to authorize the Company: (1) to isolate the largest net-metered accounts (greater than 25kW) for reconciliation on an annual basis from smaller accounts;⁴ (2) to conduct an annual reconciliation applying a “Volumetric Method” using a weighted average; (3) to provide net metering customers with an option to cash out and/or transfer any remaining credits following the annual reconciliation; (4) apply any applicable billing charges stemming from the annual reconciliation

¹ See R.I. Gen. Laws § 39-26.4-2(8) and (22).

² See R.I. Gen. Laws § 39-26.4-3(a)(2).

³ See Tr. 439: 14-20 (Company – Blazunas).

⁴ Please note that, at the time the Company filed the tariff advice, it expected reconciliation to be a manual and labor-intensive process and thus proposed to conduct the reconciliation in stages, with the largest net-metered accounts (> 25 kW) reconciled in the first stage and the smaller net metered accounts (< 25 kW) reconciled in the second stage (Joint Testimony at 13). As discussed in the Company’s response to PUC 1-1, the Company is utilizing the free and publicly available statistical computing program “R” to perform the reconciliation analysis more efficiently for smaller accounts (Exh. PUC 1-1). Consequently, it can present the reconciliation of both larger and smaller net metered accounts at the same time (i.e., not in stages): “We’re still working on the analysis as of now. If you think about the analysis in the two phases, Phase 1 is the large standalone customers. Phase 2 is the thousands of behind-the-meter customers. You know, part of what’s been taking a little longer is just we’re trying to do them both at the same time. We’re able to do that now, because we’re using a statistical software to accomplish, you know, what would be calculations in Excel for multiple customers, which would be cumbersome administratively” (Tr. 80:15-25 (Division – Blazunas)).

or true up to the host account; and (5) require a stand-alone net metering project that is required to allocate net metering credits to eligible credit recipients via Schedule B to allocate as close to 100% of the credits as possible before the project receives authority to interconnect (“ATI”). (See Company’s response to PUC 4-2).

The Volumetric Method for reconciliation compares kWh generated to kWh consumed over an annual period, and applies billing charges for ratios greater than 100% (Joint Testimony at 12; Exh. PUC 1-3). The Company proposes to use a “weighted average” billing charge for the annual reconciliation whereby the Company would weigh the Renewable Net Metering Credit and Excess Renewable Net Metering Credit used to calculate the billing charges based on a customer’s monthly excess generation (Joint Rebuttal Testimony of Russell Salk and Blazunas at 5; Exh. MAE 2-3).

Second, requiring the percentage allocation of credits on Schedule B to equal 100% will ensure that unused credits do not bank on the host account, unable to be used (Joint Testimony at 14; Exhs. PUC 1-11; PUC 1-12). Requiring that the Schedule B estimated generation to consumption ratio equal no greater than 100% will help minimize the number of accounts requiring a billing charge, and/or minimize the value of the billing charge (id.; Exh. Division 1-1).

Third, the Net Metering Tariff and Statute permit more generation than consumption up to 125% and that, after the annual reconciliation analysis and billing charges (if applicable), any credits remaining on the net metered accounts belong to the customer (Joint Testimony at 15; Exh. Division 1-7). As a result, the transfer and cash out provisions allow a customer to have the option to transfer or cash out the excess credit at the statutorily set Last Resort Service (“LRS”) rate (id.).

The Company is proposing to perform the annual reconciliation starting with calendar year 2022. Tr. 407: 8-12 (Revyt - Russell Salk).⁵ For the calendar year 2023 reconciliation and beyond, the Company intends to file the annual Volumetric Method reconciliations by August 1st each year to update the net metering charge to reflect the results of the Volumetric Method reconciliation (Joint Testimony at 17). The component of the net metering charge rate that was approved and effective for the 12-month period April to March in the Annual Retail Rate Filing would remain unchanged and the component for the reconciliation would be calculated for the period October to March (*id.*). Both components of the net metering charge would be a uniform per kWh charge applicable to all customers. Each April, the Volumetric Method reconciliation amount in the net metering charge would be set to zero and updated each October once the results of the reconciliation are complete (*id.*).

The Billing Charges will be applied to certain net metered customer accounts following the reconciliation analysis (Joint Testimony at 18). The Company is working on a communication strategy to explain the billing charges clearly to net metered customers (*id.* at 18).

The Proposal will allow for more precise calculations and administration of renewable net metering credits and excess net metering credits. Further, the Proposal is compliant with the Net Metering Statute. The Company respectfully requests the Commission approve the Proposal.⁶

III. The Proposal is Consistent with the Net Metering Statute

The Company respectfully requests that the Commission approve the changes to the Net Metering Tariff as filed, and approve the timing for implementation of the Proposal. The Net

⁵ The Company continues to work on the 2022 reconciliation and will provide the results once completed.

⁶ The Division's witness noted at the November 9, 2023 evidentiary hearing in this proceeding that he continues to support the Company's proposal (Tr. 750:11-19 (Company – Brennan)).

Metering Statute provides the statutory basis for the net metering program and the Net Metering Tariff.

A. The Net Metering Tariff Authorizes the Company to Estimate the Aggregate Consumption of Eligible Net-Metered Accounts or Eligible Credit Recipient Accounts Associated with Community Remote Net Metering for Purposes of Reconciling Net Metering Payments and Credits, in Order to Facilitate the Administration of Net Metering.

The Net Metering Statute acknowledges the need for ease in administering net-metered accounts as supported by the following statutory provision:⁷

- (2) For ease of administering net-metered accounts and stabilizing net-metered account bills, the electric-distribution company may elect (but is not required) to estimate for any twelve-month (12) period:
 - (ii) Aggregate consumption of the net-metered accounts at the eligible net-metering system site or the sum of the consumption of the eligible credit-recipient accounts associated with the community remote net-metering system, and establish a monthly billing plan that reflects the expected credits that would be applied to the net-metered accounts over twelve (12) months. The billing plan would be designed to even out monthly billings over twelve (12) months, regardless of actual production and usage. If such election is made by the electric-distribution company, the electric-distribution company would reconcile payments and credits under the billing plan to actual production and consumption at the end of the twelve-month (12) period and apply any credits or charges to the net-metered accounts for any positive or negative difference, as applicable. Should there be a material change in circumstances at the eligible net-metering system site or associated accounts during the twelve-month (12) period, the estimates and credits may be adjusted by the electric-distribution company during the reconciliation period.

R.I. Gen. Laws §39-26.4-3(a)(2).

The Volumetric Method proposed by the Company is the mechanism by which the Company is proposing to reconcile estimated to actual net metering credits and costs to facilitate the administration of net metering. Specifically, the reconciliation method is addressed in the

⁷ Please note this statutory provision, R.I. Gen. Laws §39-26.4-3(a)(2), is not the basis for performing the reconciliation but rather support that the Net Metering Statute recognizes the need for administrative ease.

proposed Net Metering Tariff by authorizing the Company to isolate the largest net-metered accounts for reconciliation on an annual basis from smaller accounts to facilitate flowing the largest potential excess balances back to distribution customers in an administratively efficient manner. The Volumetric Method is not addressed in the Net Metering Statute, nor does the Net Metering Statute address any specific method for reconciling net metering costs (Joint Testimony at 14). As such, the Volumetric Method, which is administratively feasible as it relies on the Company's billing system data to calculate excess generation⁸ and its Commission-approved tariff rates to calculate billing charges,⁹ does not conflict with any provision of the Net Metering Statute.

B. The basis for the annual reconciliation stems from the statutory definition of renewable net metering credits and excess renewable net metering credits.

The credit calculation of the Volumetric Method, however, closely aligns with the definitions of “Renewable Net-Metering Credit” and “Excess Renewable Net Metering Credit” found in the Net Metering Statute (see Exhs. PUC 1-10; MAE 1-1). The Net Metering Statute provides clear language on the definition of, and rate for, a Renewable Net Metering Credit and an Excess Renewable Net Metering Credit, respectively:

(22) “Renewable net-metering credit” means a credit that applies to an eligible net-metering system or a community remote net-metering system up to one hundred percent (100%) of either the renewable self-generator's usage at the eligible net metering system site or the sum of the usage of the eligible credit-recipient accounts associated with the community remote net-metering system over the applicable billing period. This credit shall be equal to the total kilowatt hours of electrical energy generated up to the amount consumed on-site, and/or generated up to the sum of the eligible credit-recipient account usage during the billing period multiplied by the sum of the distribution company's:

(i) Last resort service kilowatt-hour charge for the rate class applicable to the net metering customer, except that for remote public entity and multi-municipality collaborative net-metering systems that submit an application for an interconnection study on or after July 1, 2017, and community remote

⁸ See Tr. 160: 6-11 (Commission – Russell Salk).

⁹ Joint Rebuttal Testimony of Russell Salk and Blazunas at 6.

net-metering systems, the last resort service kilowatt-hour charge shall be net of the renewable energy standard charge or credit;

- (ii) Distribution kilowatt-hour charge;
- (iii) Transmission kilowatt-hour charge; and
- (iv) Transition kilowatt-hour charge.

For projects after April 15, 2023, subject to the allowable two hundred seventy-five megawatts alternating current (275MWac), under § 39-26.4-3(a)(1)(vi), the credit shall be reduced by twenty percent (20%).

Notwithstanding the foregoing, except for systems that have requested an interconnection study for which payment has been received by the distribution company, or if an interconnection study is not required, a completed and paid interconnection application, by December 31, 2018, the renewable net-metering credit for all remote public entity and multi-municipal collaborative net-metering systems shall not include the distribution kilowatt-hour charge commencing on January 1, 2050.

R.I. Gen. Laws §39-26.4-2(22).

(8) “Excess renewable net-metering credit” means a credit that applies to an eligible net-metering system or community remote net-metering system for that portion of the production of electrical energy beyond one hundred percent (100%) and no greater than one hundred twenty-five percent (125%) of the renewable self-generator's own consumption at the eligible net-metering system site or the sum of the usage of the eligible credit recipient accounts associated with the community remote net-metering system during the applicable billing period. Such excess renewable net-metering credit shall be equal to the electric-distribution company's avoided cost rate, which is hereby declared to be the electric-distribution company's last resort service kilowatt hour (kWh) charge for the rate class and time-of-use billing period (if applicable) applicable to the customer of record for the eligible net-metering system or applicable to the customer of record for the community remote net-metering system. The commission shall have the authority to make determinations as to the applicability of this credit to specific generation facilities to the extent there is any uncertainty or disagreement.

R.I. Gen. Laws §39-26.4-2(8) (emphasis added)

The Volumetric Method proposes to determine billing charges at the end of the annual reconciliation period by calculating Renewable Net Metering Credit as the sum of the following components:

- (i) LRS kilowatt-hour charge for the rate class applicable to the net metering customer, not including the Renewable Energy Standard (“RES”) charge;
- (ii) Distribution kilowatt-hour charge;
- (iii) Transmission kilowatt-hour charge; and
- (iv) Transition kilowatt-hour charge.

(Joint Testimony at 8).

Excess renewable net metering credits are calculated as the equivalent of the Company’s avoided cost rate, or the LRS kilowatt-hour (kWh) charge (*id.*). Each is consistent with the statutory definitions of “Renewable Net Metering Credit” and “Excess Renewable Net Metering Credit” respectively described above. The Net Metering Statute, and the Company’s proposed Net Metering Tariff are also consistent in that both distinguish the level of credit that would be applied: (1) when a customer’s net metering generation to consumption ratio is equal to, or less than, 100 percent; and (2) when a customer’s net metering generation to consumption ratio is more than 100 percent but less than or equal to 125 percent.

C. The Company’s Proposal Requiring a Stand-Alone Net Metering Project to Allocate Net Metering Credits to Eligible Credit Recipients as Close to 100 Percent as Possible is Consistent with the Net Metering Statute.

The Company’s proposed Net Metering Tariff requires a stand-alone net metering project that is required to allocate net metering credits to eligible credit recipients via Schedule B to allocate as close to 100% of the credits as possible before the project receives authority to interconnect (“ATI”) (Joint Testimony at 12). Requiring the percentage allocation of credits to equal 100% will ensure that unused credits do not bank on the host account, unable to be used (*id.*). For purposes of net metering, the developer of a stand-alone net metering project is the Company’s host customer, to which the Company provides credits for the project’s generation. These host customers allocate credits to the various eligible net metering accounts identified by

the host customer on Schedule B. Requiring that the Schedule B estimated generation to consumption ratio equal no greater than 100% will help minimize the number of accounts requiring a billing charge, and/or minimize the value of the billing charge (id.). As required in the Net Metering Statute, “Eligible Net-Metering Systems” must use an eligible net-metering resource that is “reasonably designed and sized to annually produce electricity in an amount equal to, or less than, the renewable self-generator’s usage” at the system site. R.I. Gen. Laws §39-26.4-2(6). This allocation methodology supports the Net Metering Statute stated intention of having the net metering system be closely sized to the generator’s usage. Accordingly, this allocation requirement does not conflict with any provision of the Net Metering Statute, and should be approved by the Commission.

D. The transfer and cash out provisions are consistent with the Net Metering Statute.

The Company’s proposed Net Metering Tariff includes a provision authorizing the Company to issue checks, i.e. “cash out”, excess renewable net metering credits (credits for energy produced that is between 100% and 125% of the net metering customer’s usage during the billing period) on an annual basis at the average annual LRS rate, after the reconciliation billing charges apply (Joint Testimony at 12). The Net Metering Statute explicitly authorizes the Company to cash-out net metering credits to customers.

Importantly, the Net Metering Statute explicitly states that, in an effort to ease administering net-metered accounts, the Company:

“...may elect (but is not required) to issue checks to any net-metering customer in lieu of billing credits or carry-forward credits or charges to the next billing period.”

Id.

The term “net metering customer” is defined as:

“a customer of the electric distribution company receiving and being billed for distribution service whose distribution account(s) are being net metered.”

Id.

Moreover, this authority to cash out net metering credits is not limited to customers served by behind-the-meter facilities, or Community Remote Net Metering Systems. It authorizes the Company to issue checks to “any net-metering customer.” Accordingly, the Company’s proposed “cash-out” provision is consistent with the Net Metering Statute, and should be approved by the Commission.

V. **Briefing Questions**

A. In order to adjust the LRS used for purposes of the annual reconciliation relating to the Excess Net Metering Credits, as recommended by Gridwealth, would the Commission need to change the avoided cost rate referenced in the Docket 4268 Order?

In The Narragansett Electric Company d/b/a National Grid, Docket 4268 (2012), the Commission reviewed the Company’s revisions to its Net Metering Tariff and Qualifying Facility Tariff and reviewed a similar set of issues on the appropriate applicable avoided cost rate and the issuance of checks versus credits for energy above 100 percent of consumption. Given the parallels to the instant proceeding, applying the Commission’s logic and ultimate precedent to the instant proceeding is appropriate.

In Docket 4268, in reference to the Net Metering Statute, the Commission found “the avoided cost rate set forth in the statute clearly applies” to renewable energy technologies. Docket 4268 at 12 (emphasis added). Indeed, the Commission acknowledged “the General Assembly did set forth an avoided cost rate applicable to renewable energy above 100 percent of a facility’s usage” and found the Company’s use of the Standard Offer Service rate to be the appropriate avoided cost rate for renewable Qualifying Facilities. Id. Further, the Commission found

“National Grid’s interpretation that the General Assembly was setting the avoided cost rate for all renewable qualified facilities” to be reasonable. Id.

Given this precedent, if the Commission changed the avoided cost rate for excess net metering credits, the Commission would need to revise the avoided cost rate for qualified facilities as well. GridWealth, who proposed a different avoided cost rate, provides no valid legal argument for why the Commission should now have a different statutory interpretation and overturn precedent.

B. Given the declaration by the General Assembly within the statutory definition, does the Commission have the authority to declare the avoided cost rate to be different for purposes of the annual reconciliation than what is declared in the statutory definition?

There is no room for statutory interpretation; the Net Metering Statute clearly states the Excess Net Metering Credits shall be equal to an EDCs’ avoided cost rate, which is hereby declared to be the electric distribution company’s last resort service kilowatt hour (kWh). The Net Metering Statute in relevant part provides:

(8) “Excess renewable net-metering credit” means a credit that applies to an eligible net-metering system or community remote net-metering system for that portion of the production of electrical energy beyond one hundred percent (100%) and no greater than one hundred twenty-five percent (125%) of the renewable self-generator's own consumption at the eligible net-metering system site or the sum of the usage of the eligible credit recipient accounts associated with the community remote net-metering system during the applicable billing period. Such excess renewable net-metering credit shall be equal to the electric-distribution company's avoided cost rate, which is hereby declared to be the electric-distribution company's last resort service kilowatt hour (kWh) charge for the rate class and time-of-use billing period (if applicable) applicable to the customer of record for the eligible net-metering system or applicable to the customer of record for the community remote net-metering system. The commission shall have the authority to make determinations as to the applicability of this credit to specific generation facilities to the extent there is any uncertainty or disagreement.

R.I.G.L. §39-26.4-2(8)(emphasis added).

When reviewing a statute to determine its meaning the Supreme Court of Rhode Island stated, “our ultimate goal is to give effect to the General Assembly's intent.” In Re Proposed Town of New Shoreham Project, 25 A.3d 482, 504 (2011) quoting State v. Graff, 17 A.3d 1005, 1010 (R.I.2011)(citations omitted). If it is determined “the language of a statute is clear and unambiguous,’ we have our oft-relied-upon precedent for acquiring the intentions of the Legislature: ‘interpret the statute literally’ and ‘give the words of the statute their plain and ordinary meanings.” Id. at 505 quoting In re Narragansett Bay Commission General Rate Filing, 808 A.2d at 636 (quoting Cummings v. Shorey, 761 A.2d 680, 684 (R.I.2000)); McGuirl v. Anjou International Co., 713 A.2d 194, 197 (R.I.1998) (“When the language of a statute is unambiguous and expresses a clear and sensible meaning, there is no room for statutory construction or extension, and we must give the words of the statute their plain and obvious meaning. Such meaning is presumed to be the one intended by the Legislature.”) (quoting Wayne Distributing Co. v. Rhode Island Commission For Human Rights, 673 A.2d 457, 460 (R.I.1996)).

The Net Metering Statute is clear and unambiguous by simply stating, “excess renewable net-metering credit shall be equal to the electric-distribution company's avoided cost rate, which is hereby declared to be the electric distribution company's last resort service kilowatt hour (kWh) charge for the rate class and time-of-use billing period (if applicable) applicable to the customer of record for the eligible net-metering system or applicable to the customer of record for the community remote net-metering system.” R.I.G.L. §39-26.4-2(8)(emphasis added). Given this unambiguous language, “there is no room for statutory construction or extension” and the plain meaning “is presumed to be the one intended by the Legislature.” 673 A.2d 457, 460.

The Commission does not have authority to declare the avoided cost rate to be different for purposes of the annual reconciliation than what is declared in the statutory definition. The Net

Metering Statute is clear and unambiguous leaving no room for Commission interpretation. Moreover, while the General Assembly specifically provided the Commission with authority to “make determinations as to the *applicability* of this credit to specific generation facilities,” the General Assembly did not provide the Commission authority to materially change the avoided cost rate clearly set as the last resort service kWh in the Net Metering Statute. R.I. Gen. Laws §39-26.4-2 (emphasis added).

Given the clear and unambiguous language in the Net Metering Statute, the General Assembly intended for the avoided cost to be the LRS rate and did not intend to give the Commission discretion to set the avoided cost rate to some other value.

IV. Conclusion

The Company requests the Commission approve the Proposal as outlined above, without modification. The Proposal will result in more precise calculations and administration of renewable net metering credits and excess renewable net metering credits in an administratively efficient manner. Moreover, the Proposal is compliant with and facilitates the purpose of the Net Metering Statute. The Company appreciates the opportunity to respond to the briefing questions posed by the Commission.

Respectfully Submitted,

**The Narragansett Electric Company
d/b/a Rhode Island Energy**

By its attorney,



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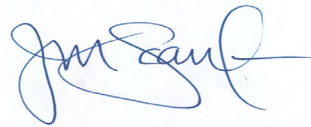
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Date: November 29, 2023

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2023, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 23-05-EL.

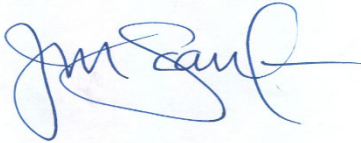


Joanne Scanlon

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 hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

November 29, 2023

Date

**Docket No. 23-05-EL Rhode Island Energy – Net Metering Provision, RIPUC No. 2268
Service List updated 9/22/2023**

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