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December 14, 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  
Evidentiary Hearing – October 5, 2023  
Supplemental Response to RR-2 and RR-3**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) enclosed is the Company’s supplemental response to Record Request No. 2 and 3 issued at the Evidentiary Hearing on October 5, 2023 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

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-05-EL  
In Re: Net Metering Excess Credits Tariff Advice 2023  
Responses to the Record Requests  
Issued at the Commission's Evidentiary Hearing  
On October 5, 2023

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Record Request No. 2 - Supplemental

Request:

Please update the Company's Response to PUC 7-1 in Docket No. 5127.

Response:

The Company's response to PUC 7-1 in Docket No. 5127 is attached as Attachment RR-2.

The Company is presently undertaking the volumetric method analysis that will form the basis of the updated response to PUC 7-1 for Calendar Year 2021 and Calendar Year 2022 and will provide it once it is available. The Company anticipates that the update to PUC 7-1 will be completed by November 17, 2023.

Supplemental Response:

Please see Attachment RR-2 Supplemental for the current estimate of the volumetric method analysis for Calendar Year 2021 and Calendar Year 2022. The Company has not performed a monetary method analysis for Calendar Year 2021 or Calendar Year 2022.

The Company will make every effort to provide Host Customers subject to the program with adequate time in 2024 to work with the Company to ensure that the Company has accurately reconciled its net metering costs attributable to a Host Customer's account and is charging/crediting the Host Customer's account accordingly. Further, the Company will commit to hearing and potentially re-evaluating any customer disputes related to a billing charge or estimate.

	(a)		(b)		(c)		(d)		(e) = (a) + (b) + (c) + (d)	(f) = (a) + (b)		(g) = (c) + (d)
	Greater than 25 kW		Less than 25 kW		Total		Greater than 25 kW	Less than 25 kW		Greater than 25 kW	Less than 25 kW	
CY 2022 Volumetric Method	BTM	Community	BTM	Community								
(1) Systems Evaluated	150	92	9,516	157	9,915					242	9,673	
(2) Tier 1 Excess Generation (kWh)	365,996	16,145,339	2,431,817	1,024,905	19,968,057					16,511,334	3,456,722	
(3) Tier 2 Excess Generation (kWh)	252,105	32,533,833	939,045	4,843,417	38,568,401					32,785,939	5,782,463	
(4) Tier 1 Billing Charge	\$ 18,644	\$ 1,525,420	\$ 239,877	\$ 97,128	\$ 1,881,069					\$ 1,544,064	\$ 337,005	
(5) Tier 2 Billing Charge	\$ 33,764	\$ 6,170,256	\$ 182,972	\$ 919,311	\$ 7,306,302					\$ 6,204,019	\$ 1,102,283	
(6) Total Billing Charge	\$ 52,408	\$ 7,695,675	\$ 422,850	\$ 1,016,438	\$ 9,187,371					\$ 7,748,083	\$ 1,439,288	
(7) Tier 1 Billing Charge (All Excess Generation)	\$ 32,214	\$ 4,614,492	\$ 332,330	\$ 554,485	\$ 5,533,521					\$ 4,646,706	\$ 886,815	

	Greater than 25 kW		Less than 25 kW		Total		Greater than 25 kW	Less than 25 kW
	BTM	Community	BTM	Community				
(8) Systems Evaluated	150	77	9,516	144	9,887		227	9,660
(9) Tier 1 Excess Generation (kWh)	321,954	17,239,605	1,115,624	26,516	18,703,698		17,561,558	1,142,140
(10) Tier 2 Excess Generation (kWh)	102,901	13,184,790	339,616	63,214	13,690,520		13,287,691	402,829
(11) Tier 1 Billing Charge	\$ 16,044	\$ 595,340	\$ 205,155	\$ 2,236	\$ 818,775		\$ 611,384	\$ 207,391
(12) Tier 2 Billing Charge	\$ 10,237	\$ 522,248	\$ 82,937	\$ 6,892	\$ 622,314		\$ 532,484	\$ 89,829
(13) Total Billing Charge	\$ 26,281	\$ 1,117,588	\$ 288,092	\$ 9,129	\$ 1,441,089		\$ 1,143,868	\$ 297,220
(14) Tier 1 Billing Charge (All Excess Generation)	\$ 20,919	\$ 878,727	\$ 262,299	\$ 5,958	\$ 1,167,902		\$ 899,645	\$ 268,257

Record Request No. 3 - Supplemental

Request:

For the years covered in Record Request 2:

- a. Please calculate the difference in revenue requirement for the Net Metering Charge if the PUC were to approve the Company's proposal to estimate the percentage of generation for the purposes of distinguishing excess renewable net metering credits from zero-credit net metering credits for single-meter systems compared to assuming all generation over 100% of annual use is excess generation.
- b. Please provide the difference in Net Metering Charge for each year in Part a using the projected total kWh that were assumed in the applicable Retail Rate Filing.

Response:

- a. Assuming the use of the Volumetric Method, please refer to Attachment RR-3 for Calendar Year 2019 and 2020. Please note that the Company is presently undertaking the Volumetric Method analysis that will form the basis of the response with respect to Calendar Year 2021 and Calendar Year 2022 and will provide it once it is available. The Company anticipates that the updated response will be filed by November 17, 2023.
- b. Assuming the use of the Volumetric Method, please refer to Attachment RR-3 for Calendar Year 2019 and 2020. Please note that the Company is presently undertaking the Volumetric Method analysis that will form the basis of the response with respect to Calendar Year 2021 and Calendar Year 2022 and will provide it once it is available. The Company anticipates that the updated response will be filed by November 17, 2023.

Supplemental Response:

- a. & b. Please refer to Attachment RR-3 Supplemental for Calendar Year 2021 and 2022, assuming the use of the Volumetric Method.

**CALENDAR YEAR 2019**

Calendar Year 2019 - Total Charge (\$)		
(1) Net Metering Charge Revenue Requirement	\$ 18,822,783	Docket No. 5127, Schedule REP-16, Page 1, Line (13), Column (e)
(2) Volumetric Method - Total Charge (\$) - BTM (Greater than 25 kW)	\$ (18,319)	Docket No. 5127, PUC 7-1, Page 2, Table 1
(3) Volumetric Method - Total Charge (\$) - BTM (Less than 25 kW)	\$ (87,724)	Docket No. 5127, PUC 7-1, Page 2, Table 1
<b>(4) Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 18,716,740</b>	<b>= (1) + (2) + (3)</b>
(5) Net Metering Charge kWh	7,067,418,959	Docket No. 5127, Schedule REP-16, Page 1, Line (14), Column (e)
(6) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00266	= (1) ÷ (5), truncated to 5 decimal places
<b>(7) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 0.00264</b>	<b>= (4) ÷ (5), truncated to 5 decimal places</b>
(8) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (106,043)	= (4) - (1)
(9) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00002)	= (7) - (6)
Calendar Year 2019 - Minimum Charge (\$)		
(10) Net Metering Charge Revenue Requirement	\$ 18,822,783	Docket No. 5127, Schedule REP-16, Page 1, Line (13), Column (e)
(11) Volumetric Method - Minimum Charge (\$) - BTM (Greater than 25 kW)	\$ (11,962)	Docket No. 5127, PUC 7-1, Page 2, Table 1
(12) Volumetric Method - Minimum Charge (\$) - BTM (Less than 25 kW)	\$ (65,175)	Docket No. 5127, PUC 7-1, Page 2, Table 1
<b>(13) Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 18,745,646</b>	<b>= (10) + (11) + (12)</b>
(14) Net Metering Charge kWh	7,067,418,959	Docket No. 5127, Schedule REP-16, Page 1, Line (14), Column (e)
(15) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00266	= (10) ÷ (14), truncated to 5 decimal places
<b>(16) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 0.00265</b>	<b>= (13) ÷ (14), truncated to 5 decimal places</b>
(17) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (77,137)	= (13) - (10)
(18) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00001)	= (16) - (15)

**CALENDAR YEAR 2020**

Calendar Year 2020 - Total Charge (\$)		
(19) Net Metering Charge Revenue Requirement	\$ 30,557,074	Docket No. 5127, Schedule NG-16, Page 1, Line (13), Column (e)
(20) Volumetric Method - Total Charge (\$) - BTM (Greater than 25 kW)	\$ (51,732)	Docket No. 5127, PUC 7-1, Page 2, Table 3
(21) Volumetric Method - Total Charge (\$) - BTM (Less than 25 kW)	\$ (125,545)	Docket No. 5127, PUC 7-1, Page 2, Table 3
<b>(22) Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 30,379,797</b>	<b>= (19) + (20) + (21)</b>
(23) Net Metering Charge kWh	6,994,551,209	Docket No. 5127, Schedule NG-16, Page 1, Line (14), Column (e)
(24) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00436	= (19) ÷ (23), truncated to 5 decimal places
<b>(25) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 0.00434</b>	<b>= (22) ÷ (23), truncated to 5 decimal places</b>
(26) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (177,277)	= (22) - (19)
(27) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00002)	= (25) - (24)
Calendar Year 2020 - Minimum Charge (\$)		
(28) Net Metering Charge Revenue Requirement	\$ 30,557,074	Docket No. 5127, Schedule NG-16, Page 1, Line (13), Column (e)
(29) Volumetric Method - Minimum Charge (\$) - BTM (Greater than 25 kW)	\$ (31,470)	Docket No. 5127, PUC 7-1, Page 2, Table 3
(30) Volumetric Method - Minimum Charge (\$) - BTM (Less than 25 kW)	\$ (91,429)	Docket No. 5127, PUC 7-1, Page 2, Table 3
<b>(31) Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 30,434,175</b>	<b>= (28) + (29) + (30)</b>
(32) Net Metering Charge kWh	6,994,551,209	Docket No. 5127, Schedule NG-16, Page 1, Line (14), Column (e)
(33) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00436	= (28) ÷ (32), truncated to 5 decimal places
<b>(34) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 0.00435</b>	<b>= (31) ÷ (32), truncated to 5 decimal places</b>
(35) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (122,899)	= (31) - (28)
(36) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00001)	= (34) - (33)

**CALENDAR YEAR 2021**

Calendar Year 2021 - Total Charge (\$)		
(1) Net Metering Charge Revenue Requirement	\$ 36,032,809	Docket No. 5234, Schedule NECO-16, Page 1, Line (13), Column (e)
(2) Volumetric Method - Total Charge (\$) - BTM (Greater than 25 kW)	\$ (26,281)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
(3) Volumetric Method - Total Charge (\$) - BTM (Less than 25 kW)	\$ (288,092)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
<b>(4) Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 35,718,437</b>	<b>= (1) + (2) + (3)</b>
(5) Net Metering Charge kWh	7,368,760,169	Docket No. 5234, Schedule NECO-16, Page 1, Line (14), Column (e)
(6) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00488	= (1) ÷ (5), truncated to 5 decimal places
<b>(7) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 0.00484</b>	<b>= (4) ÷ (5), truncated to 5 decimal places</b>
(8) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (314,372)	= (4) - (1)
(9) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00004)	= (7) - (6)
Calendar Year 2021 - Minimum Charge (\$)		
(10) Net Metering Charge Revenue Requirement	\$ 36,032,809	Docket No. 5234, Schedule NECO-16, Page 1, Line (13), Column (e)
(11) Volumetric Method - Minimum Charge (\$) - BTM (Greater than 25 kW)	\$ (20,919)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
(12) Volumetric Method - Minimum Charge (\$) - BTM (Less than 25 kW)	\$ (262,299)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
<b>(13) Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 35,749,592</b>	<b>= (10) + (11) + (12)</b>
(14) Net Metering Charge kWh	7,368,760,169	Docket No. 5234, Schedule NECO-16, Page 1, Line (14), Column (e)
(15) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00488	= (10) ÷ (14), truncated to 5 decimal places
<b>(16) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 0.00485</b>	<b>= (13) ÷ (14), truncated to 5 decimal places</b>
(17) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (283,217)	= (13) - (10)
(18) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00003)	= (16) - (15)

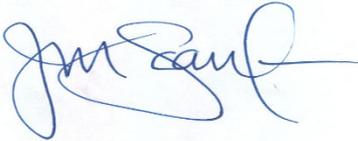
**CALENDAR YEAR 2022**

Calendar Year 2022 - Total Charge (\$)		
(19) Net Metering Charge Revenue Requirement	\$ 46,039,038	Docket No. 23-03-EL, Schedule NECO-15 - Corrected, Page 1, Line (13), Column (e)
(20) Volumetric Method - Total Charge (\$) - BTM (Greater than 25 kW)	\$ (52,408)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
(21) Volumetric Method - Total Charge (\$) - BTM (Less than 25 kW)	\$ (422,850)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
<b>(22) Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 45,563,781</b>	<b>= (19) + (20) + (21)</b>
(23) Net Metering Charge kWh	7,330,776,084	Docket No. 23-03-EL, Schedule NECO-15 - Corrected, Page 1, Line (14), Column (e)
(24) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00628	= (19) ÷ (23), truncated to 5 decimal places
<b>(25) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Total Charge (\$)</b>	<b>\$ 0.00621</b>	<b>= (22) ÷ (23), truncated to 5 decimal places</b>
(26) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (475,257)	= (22) - (19)
(27) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00007)	= (25) - (24)
Calendar Year 2022 - Minimum Charge (\$)		
(28) Net Metering Charge Revenue Requirement	\$ 46,039,038	Docket No. 23-03-EL, Schedule NECO-15 - Corrected, Page 1, Line (13), Column (e)
(29) Volumetric Method - Minimum Charge (\$) - BTM (Greater than 25 kW)	\$ (32,214)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
(30) Volumetric Method - Minimum Charge (\$) - BTM (Less than 25 kW)	\$ (332,330)	Docket No. 23-05-EL, RR-1 Attachment Supplemental
<b>(31) Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 45,674,494</b>	<b>= (28) + (29) + (30)</b>
(32) Net Metering Charge kWh	7,330,776,084	Docket No. 23-03-EL, Schedule NECO-15 - Corrected, Page 1, Line (14), Column (e)
(33) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement	\$ 0.00628	= (28) ÷ (32), truncated to 5 decimal places
<b>(34) Net Metering Charge (\$/kWh): Net Metering Charge Revenue Requirement Net Minimum Charge (\$)</b>	<b>\$ 0.00623</b>	<b>= (31) ÷ (32), truncated to 5 decimal places</b>
(35) Difference in Net Metering Charge Revenue Requirement (Total Charge (\$))	\$ (364,544)	= (31) - (28)
(36) Difference in Net Metering Charge (\$/kWh) (Total Charge (\$))	\$ (0.00005)	= (34) - (33)

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.



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Joanne M. Scanlon

December 14, 2023

Date

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

<b>Parties' Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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