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April 29, 2026

Ms. Stephanie De La Rosa
Clerk
State of Rhode Island
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 25-19-EL – In re: The Narragansett Electric Company d/b/a Rhode Island Energy’s Proposed Green Button Connect, Home Area Network, and Grid Edge Computing Plans

Dear Ms. De La Rosa:

Enclosed please find an original and nine copies of the following:

1. Supplemental Testimony of Michael Murray on behalf of Mission:Data Coalition.

Please note that an electronic copy of this filing has been provided to the service list. Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Service List (via electronic mail)

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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In Re: Proposed Green Button)
Connect, Home Area Network)
And Grid Edge Computing)
)

Docket No. 25-19-EL

**SUPPLEMENTAL TESTIMONY OF
MICHAEL MURRAY**

**ON BEHALF OF
MISSION:DATA COALITION**

Date Filed: April 29, 2026

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS OF YOUR EMPLOYER AND ROLE AT THE ORGANIZATION.

A. My name is Michael E. Murray. I am President of the Mission:data Coalition (“Mission:data”). My business address is 7511 Greenwood Avenue North #1809, Seattle, WA 98103.

Q. ARE YOU THE SAME MICHAEL MURRAY WHO SUBMITTED DIRECT TESTIMONY IN THIS PROCEEDING ON DECEMBER 5TH, 2025?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?

A. On March 4th, 2025, the Commission issued an order limiting the scope of the hearing scheduled for May 13th, 2026. The Commission’s order stated:

- a. The purpose of the hearing will be limited to the following questions:
 - i. Whether the Company should be authorized or required to move forward with the Green Button Connect plan as described in the filing, subject to further review after the Company certifies that the plan is ready for implementation and the Company performs a live demonstration (if such demonstration is requested by the Commission), and
 - ii. Whether the Commission should decline to authorize or require the Company to move forward with the plan as described in the filing, and, as a consequence, whether the Commission should order a reduction in the AMF investment cost cap by the projected cost of Green Button Connect in the amount of \$664,000, as shown in the Company’s Attachment PUC 1-4-2-Supplemental in Docket No. 25-54-EL.

1 b. The Commission will not consider any expansions to the Green Button Connect
2 plan which would conflict with the Company's management discretion to offer Green
3 Button Connect functionality that the Company is willing to develop and implement.
4 On April 16, 2026, Commission Staff then directed intervenors to file supplemental
5 testimony on the question of whether the Company's Green Button Connect plan as
6 proposed should be approved by April 29, 2026. Consistent with these directives, the
7 purpose of this supplemental testimony is to explain my recommendation that the
8 Commission reject Rhode Island Energy's ("RI Energy" or the "Company") Green
9 Button Connect ("GBC") plan and order a reduction in the advanced metering
10 functionality ("AMF") cost cap in the amount of \$664,000.

11 **II. DISCUSSION**

12 **Q. PLEASE OUTLINE WHY THE COMPANY'S GREEN BUTTON CONNECT PLAN**
13 **SHOULD BE REJECTED.**

14 A. Three reasons underpin my recommendation. First, neither Louisville Gas & Electric
15 ("LG&E") nor the GBC vendor have ever succeeded in implementing a basic GBC to
16 my knowledge. The Kentucky instance is a demonstrable failure and a waste of
17 money. Since the filing of direct testimony in this proceeding on December 5, 2025,
18 Mission:data has made additional attempts with LG&E to troubleshoot LG&E's GBC,
19 but LG&E has been unable to fix its fatal flaws. Approving RI Energy's plan, which
20 uses the same GBC implementation as LG&E's, would be throwing good money
21 after bad.

22 Second, the Company's plan would be a *de facto* ban on demand response for
23 residential and small commercial customers. By lacking critical information

1 necessary to meet the requirements of ISO-New England (“ISO-NE”), the
2 Company’s plan makes it practically impossible for small customers to participate in
3 the wholesale market, thereby undermining state policy goals such as affordability
4 and decarbonization.

5 Third, under RI Energy’s plan, the Company will make its own terms and conditions
6 for GBC users without Commission review. In my experience, such terms will likely
7 be unfair, arbitrary and anti-competitive, deterring energy management firms from
8 using GBC and further undermining customer benefits.

9 **Q. PLEASE EXPLAIN YOUR FIRST REASON.**

10 A. To my knowledge, neither PPL Corp. nor its vendor, VertexOne, have ever
11 implemented a successful GBC. I am aware of only two GBC deployments from
12 VertexOne, and they are both failures. LG&E’s GBC in Kentucky is non-functional,
13 as I described in my December 5th, 2025 testimony. VertexOne also provided GBC
14 for Hawaiian Electric Company (“HECO”). According to HECO’s published metrics,
15 as of December 31st, 2025, zero customers are using HECO’s GBC.¹ Moreover, no
16 HECO customers have *ever* been successful using GBC since reporting began in
17 Q1 2024.²

18

¹ Hawaiian Electric Company - Performance Based Ratemaking metrics disclosure:
<https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics/customer-engagement>

² *Id.*

1 **Q. SINCE YOUR DECEMBER 5, 2025 TESTIMONY, HAVE YOU ENGAGED**
2 **FURTHER WITH LG&E ON THEIR GBC SYSTEM?**

3 A. Yes. Working with an employee under my supervision, we continued to
4 communicate with LG&E and attempted to use the GBC platform with LG&E
5 customers.

6 **Q. WHAT IS YOUR CONCLUSION ABOUT LG&E'S GBC?**

7 A. LG&E still does not have a functioning GBC system, and LG&E has made no further
8 progress since December 5, 2025.

9 **Q. WHAT STEPS DID YOU TAKE REGARDING LG&E'S GBC FOLLOWING YOUR**
10 **DECEMBER 5, 2025 TESTIMONY IN THIS PROCEEDING?**

11 A. On December 4, 2025, LG&E emailed us to say:

12 "Through our investigation, and with confirmation from both the Green
13 Button Alliance and our vendor, we have verified that the customer must
14 initiate the Green Button Connect data transfer directly from the third-party
15 vendor's website. If your team needs additional support or guidance on
16 the customer initiation workflow, please reach out to the Green Button
17 Alliance for further assistance."

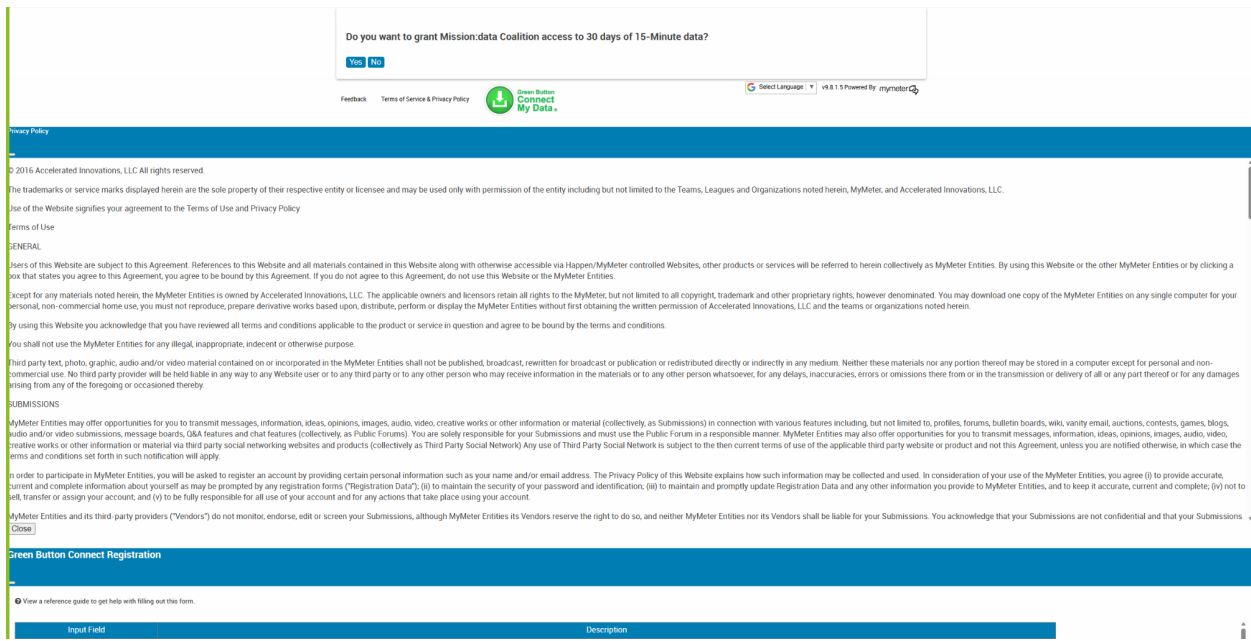
18 On December 8th, we responded:

19 "Thanks for reaching back. You are correct, customers must initiate the
20 GBC connection on a third parties [*sic.*] website. How they do this is by
21 clicking a link on the third party website that was created by the utility to
22 authorize the connection. I have not received a working link from LG&E
23 that we could put on our website."

24 On December 10, 2025 we received this response with the screenshot included
25 below:

1 “We apologize for the delay in responding to your concerns. We have met
2 with our vendor again and have been advised that the issues you have
3 been experiencing have been corrected on our side. We are re-sending
4 the metadata generated from these corrections below.

5 In addition, our vendor provided a sample url and we have included that
6 url as well as a screenshot of the resulting customer access authorization
7 to provide energy use data to Mission Data as a third party vendor. You
8 can customize this sample url for authorization to meet your
9 requirements.”



10
11 *Figure 1: Screenshot provided by LG&E*

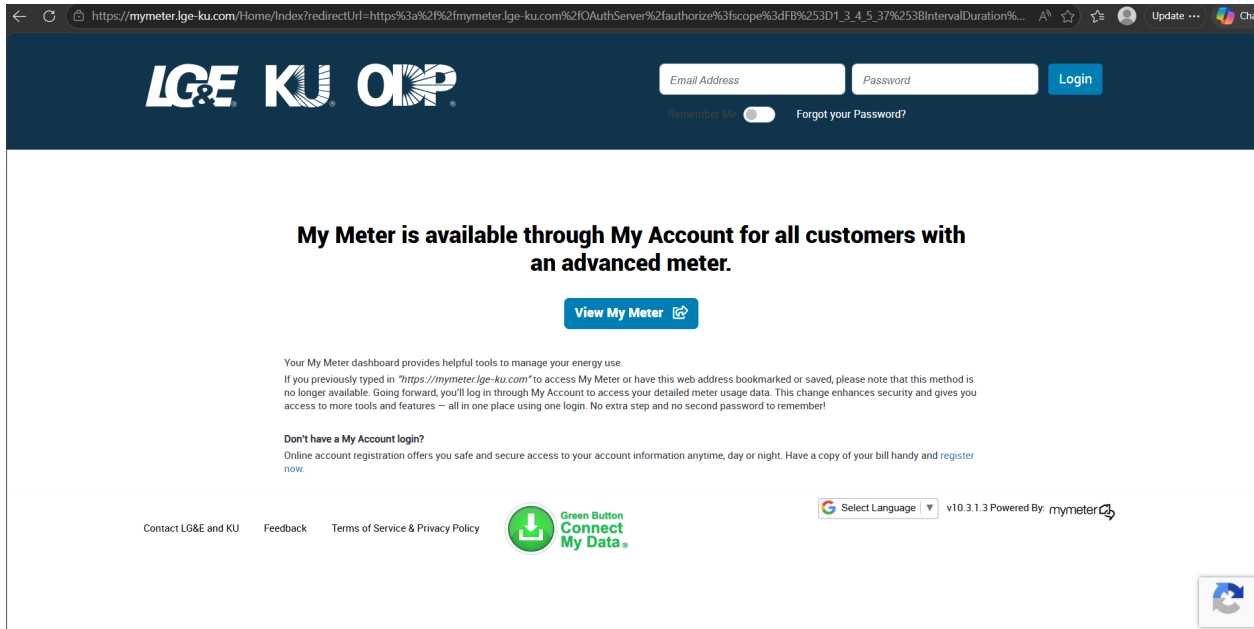
12 **Q. DID LG&E’S RESPONSE RESOLVE THE ISSUE?**

13 A. No. The “sample URL” to which LG&E refers is the authorization request URL, which
14 is a critical requirement of the GBC technical standard. After months of asking for
15 such a URL, LG&E finally provided something – a URL that LG&E claimed was a
16 functioning authorization request URL. But after multiple tests with real customers, it
17 never worked.

1 **Q. PLEASE DESCRIBE THE TESTING YOU CONDUCTED.**

2 A. On March 27, 2026, we asked an LG&E customer to use the URL provided by
3 LG&E. The customer initiated the process on our website in accordance with the
4 GBC standard. When attempting to use the URL provided by LG&E, the customer
5 was redirected to the LG&E MyMeter login page. See Figure 2 below. Logging in
6 with the customer's email address and password resulted in failures. LG&E's
7 MyMeter website stated that the credentials were incorrect, even though the
8 customer uses those login credentials successfully on LG&E's primary web portal at
9 lge-ku.com.

10



12

Figure 2: LG&E MyMeter login page at mymeter.lge-ku.com.

13

1 In order to be sure the login credential issue was not a fluke, we conducted similar
2 attempts with three (3) additional LG&E customers. Each ended with the same
3 result: The GBC authorization process, a requirement of the GBC standard, was
4 broken and went nowhere. I note that these customers *were* able to login
5 successfully with their credentials at the main LG&E web portal, lge-ku.com.

6 **Q. FIGURE 2 OFFERS A LINK TO “REGISTER NOW.” DID YOU TRY THAT?**

7 A. Yes. The “register now” link goes to [https://my.lge-](https://my.lge-ku.com/cs/b.user_registration_init.sap)
8 [ku.com/cs/b.user_registration_init.sap](https://my.lge-ku.com/cs/b.user_registration_init.sap), which can create an account on LG&E’s
9 main web portal.

10 **Q. DID THAT SOLVE THE PROBLEM?**

11 A. No. The customers with whom we tested already have established accounts with
12 LG&E’s main web portal. The issue is that those login credentials do not work on
13 “MyMeter,” the page shown in Figure 2. LG&E appears to acknowledge that
14 “MyMeter” and the main web portal are separate systems that do not work together.
15 Figure 2 states “please note that this method is no longer available.” I do not know
16 why LG&E staff recommended to us a URL that is inoperable.

17 **Q. WHAT IS YOUR CONCLUSION REGARDING LG&E?**

18 A. LG&E is not any closer to achieving a workable GBC than it was in December, 2025.
19 Despite LG&E claiming their URL problems have been “corrected,” the reality is that
20 neither “MyMeter” nor LG&E’s main web portal provide a working authorization
21 process. Finally, I note that there appears to have been little, if any, testing of the
22 GBC software, either by LG&E or its vendor.

1 **Q. WHAT IS YOUR FAMILIARITY WITH GBC PLATFORMS OFFERED BY OTHER**
2 **UTILITIES NATIONWIDE?**

3 A. My knowledge comes from direct experience registering Mission:data as a GBC third
4 party with dozens of utilities; participation in regulatory proceedings; and hearing
5 from energy management firms about their experiences with GBC implementations
6 across North America. In addition, Mission:data recently published an online map
7 showing the GBC status of over 180 utilities in the U.S. and Canada; some 35 of
8 these utilities have GBC, with details published on our map.³ I also oversaw the
9 research and publishing of our Green Button Scorecard report, released March 31,
10 2026, which evaluated in detail five (5) utilities, including LG&E, covering the GBC
11 registration process and the user experience.⁴

12 **Q. HOW COMMON IS IT FOR UTILITIES TO HAVE GBC PLATFORMS THAT FAIL**
13 **TO WORK PROPERLY?**

14 A. It has happened several times before. As a result of Mission:data's in-depth testing
15 over the past year, we have removed from our online map four utilities that advertise
16 a GBC platform but fail to deliver a working system: Ameren Illinois, Commonwealth
17 Edison, LG&E and Xcel Energy. These utilities are marked as "demoted" on our
18 online map.⁵ The four aforementioned utilities represent 11% of the number of
19 utilities with a functioning GBC.

³ <https://explorer.missiondata.io/>

⁴ <https://www.missiondata.io/news/2026/3/30/green-button-scorecard-consumers-energy-leads-lgampe-lagsnbsp>

⁵ <https://explorer.missiondata.io/>

1 **Q. WHAT IS YOUR CONCLUSION ABOUT RI ENERGY'S GBC VENDOR?**

2 A. I have seen no evidence that VertexOne has ever built a working GBC. While it is
3 theoretically possible that VertexOne has a working implementation somewhere in
4 North America, I have never seen one nor heard of one.

5 **Q. WHAT WOULD A SUCCESSFUL GBC IMPLEMENTATION LOOK LIKE?**

6 A. Consider Consumers Energy (Michigan). Consumers Energy has over 150
7 registered third parties,⁶ showing significant interest from a range of energy
8 management firms and organizations. While the customer utilization statistics from
9 Consumers Energy have never been published to my knowledge, indications are
10 that it is popular in part because it is easy for energy management firms to register.
11 In our evaluation, Mission:data successfully registered in one (1) business day and
12 could immediately begin successfully using the platform. In contrast, we have been
13 trying unsuccessfully to use LG&E's GBC for the past eight (8) months.

14 **Q. PLEASE EXPLAIN YOUR SECOND REASON.**

15 A. RI Energy's GBC plan states that it will only provide kWh meter readings and
16 timestamps via GBC.⁷ The GBC plan confirms that any other information will *not* be
17 available in GBC, such as account number, customer name and address.⁸ The
18 result is that approving RI Energy's plan will be an effective ban on small customer

⁶ <https://greenbutton.consumersenergy.com/directory>

⁷ RI Energy, Advanced Metering Functionality ("AMF") Business Case, Open Meeting Motion 13: Green Button Connect Plan. May 12, 2025 at 8-9.

⁸ *Id.*

1 participation at ISO-NE because the cost and difficulty to aggregators of accessing
2 this information for small resources will be prohibitive.

3 **Q. WHAT CUSTOMER INFORMATION DOES ISO-NE REQUIRE?**

4 A. Today, resources bidding into the energy day-ahead market are required to provide
5 the following information to ISO-NE in order to register locations and settle
6 transactions.

<i>ISO-NE data requirement</i>	<i>Provided in RI Energy's GBC plan?</i>
Account number ⁹	No
Premise address ¹⁰	No
Utility bill from the last six months ¹¹	No
The customer's Demand Response Aggregation Zone ¹²	No
The customer's Load Zone ¹³	No
60-minute usage data ¹⁴	Yes
kWh register values (monthly)	Yes

7 *Table 1: ISO-NE data requirements*

8

⁹ Customer and Asset Management System (CAMS) User Guide for Demand Asset and Demand Resource Maintenance. ISO-NE, July 2025 at 14. https://www.iso-ne.com/static-assets/documents/support/user_guides/cams_da_dr_maint_ug.pdf

¹⁰ *Id.*

¹¹ *Id.* at 4.

¹² *Id.* at 10.

¹³ *Id.* at 23.

¹⁴ ISO-NE Section III, Market Rule 1, Standard Market Design. III.3.2.1 at 99. https://www.iso-ne.com/static-assets/documents/2014/12/mr1_sec_1_12.pdf

1 **Q. WHAT PERCENT OF ISO-NE REQUIREMENTS WILL RI ENERGY PROVIDE?**

2 A. RI Energy plans to provide only two (2) out of seven (7) requirements, or 29%. That
3 means 71% of the required information will not be available.

4 **Q. WHY CAN'T AGGREGATORS GET THE REQUIRED INFORMATION FROM A**
5 **SOURCE OTHER THAN RI ENERGY?**

6 A. It is impractical and/or very costly to gather this information for tens of thousands or
7 hundreds of thousands of small customers. Let me explain.

8 For the Demand Response Aggregation Zone and Load Zone, ISO-NE has
9 published high-level maps of its territory, but these do not enable individual
10 addresses to be evaluated.¹⁵ In particular, for homes that appear to be on the
11 “seams” of two different zones, it is very difficult if not impossible to determine where
12 the home sits. RI Energy possesses the topology of the transmission and distribution
13 system and is the only entity that can reliably provide this information. Importantly,
14 for small loads (say, less than 50 kilowatts), the time and cost spent for an
15 aggregator to resolve a single instance of incorrect zone attribution can easily
16 exceed the annual revenues that the small customer generates at ISO-NE.

17 For account number, premise address and a utility bill, the customer can, in theory,
18 provide this information to the aggregator. But in practice, each requirement
19 introduces data transfer and transcription errors that quickly become costly to
20 resolve, particularly when thousands of customers are involved. Consider that not

¹⁵ <https://www.iso-ne.com/about/key-stats/maps-and-diagrams#load-zones>

1 every customer is the “simple” case of one meter with one premise. Many
2 customers, including residential customers and small businesses, have multiple
3 meters and locations; the kWh usage data that RI Energy provides under their plan
4 will not allow aggregators to determine *which* usage applies to a given location,
5 rendering GBC effectively useless.

6 **Q. DOES RI ENERGY’S GBC PLAN REQUIRE MANUAL LABOR OF**
7 **AGGREGATORS TO COLLECT, MAINTAIN, AND ACCURATELY COLLECT**
8 **CUSTOMER DATA?**

9 A. Yes. Rather than leverage GBC for efficient, software-based automation, RI Energy
10 has proposed a GBC that is cripplingly incomplete. The result will be shifting costs
11 unfairly onto aggregators who attempt to use GBC and preventing small customers
12 from participation. The benefits of automated, machine-to-machine communication
13 that GBC represents are not being provided for 71% of the information required by
14 ISO-NE.

15 **Q. WHY WON’T THE FEDERAL ENERGY REGULATORY COMMISSION SOLVE**
16 **THIS PROBLEM?**

17 A. I am not a lawyer, but under the Federal Power Act, FERC’s authority over
18 distribution utility data practices is limited at best. Moreover, with regard to Regional
19 Transmission Organizations’ (“RTOs”) and Independent System Operators’ (“ISOs”)
20 tariffs concerning metering requirements for aggregations, these tariffs are within
21 FERC’s jurisdiction, but FERC appears to be requiring little in this area. According to
22 a recent report from U.S. Department of Energy national laboratories, “Order 2222

1 did not set rigid requirements for metering and telemetry, and FERC has maintained
2 a hands-off approach when approving each RTO/ISO's requirements..."¹⁶

3 **Q. WOULDN'T REJECTING THE COMPANY'S GBC PLAN ALSO RESULT IN A DE**
4 **FACTO BAN ON SMALL RESOURCES PARTICIPATING AT ISO-NE?**

5 A. Yes it would, but the Commission could achieve that outcome at a lower cost to
6 ratepayers by rejecting the Company's plan rather than approving it. I oppose a *de*
7 *facto* ban as I have described above. But the only thing worse than a *de facto* ban
8 would be \$664,000 of ratepayer funds spent on a faux solution.

9 **Q. PLEASE EXPLAIN YOUR THIRD REASON.**

10 A. RI Energy's plans include making its own terms and conditions for GBC users
11 without Commission review. These terms cover all of the material aspects of third
12 party access, such as eligibility criteria and termination processes. The Company's
13 plan states, "The Company is creating a set of criteria that the third party vendors
14 must meet in order to be approved."¹⁷

15 **Q. WHY IS THAT A PROBLEM IN YOUR VIEW?**

16 A. In my experience across over a dozen states, without Commission oversight the
17 terms are likely to suffer from two common pitfalls that undermine the usefulness of
18 GBC and render it not worth the trouble: (1) a disclaimer that none of the data

¹⁶ State regulatory opportunities to advance distributed energy resource aggregations in wholesale markets. National Renewable Energy Laboratory, Argonne National Laboratory, Lawrence Berkeley National Laboratory. January, 2025 at 18. https://eta-publications.lbl.gov/sites/default/files/2025-01/final_der_participation_in_wholesale_market.pdf

¹⁷ RI Energy, GBC plan at 6.

1 provided will be accurate or complete; and (2) vague or subjective requirements that
2 allow RI Energy to discriminate against firms and deny access unfairly.

3 **Q. PLEASE EXPLAIN THE FIRST PITFALL.**

4 A. In my experience, many utilities have sought to impose terms and conditions upon
5 data recipients without regulatory oversight that are unfair, coercive and
6 anticompetitive. One of the most common measures is a warranty disclaimer – in
7 other words, a statement that data recipients cannot rely on the information being
8 provided as accurate or complete. This is problematic for the obvious reason that the
9 whole purpose of GBC is to enable economic transactions, such as energy efficiency
10 and demand response, as a result of the energy data provided. If such data is
11 wrong, then the customer and the data recipient will suffer damages. Examples of
12 damages include energy efficiency or rooftop solar equipment being sized
13 inappropriately or retrofits not achieving the anticipated bill savings. At ISO-NE,
14 attempting to settle demand response transactions with incorrect usage data can be
15 punishable by fines and liquidated damages.

16
17 The energy data provided by RI Energy should be accurate and complete, but the
18 Company's plan contains no such assurances. Moreover, the Company states that it
19 "is creating" the terms and conditions governing third party access – in other words,
20 the Company does not intend for the Commission to review or approve its terms.

21 Therefore, Commission approval of the Company's GBC plan would be to delegate

1 to RI Energy the authority over the accuracy of the information it provides – a fox-
2 guarding-the-henhouse situation.

3 **Q. PLEASE EXPLAIN YOUR SECOND PITFALL.**

4 A. In my experience, it is common for utilities to define vague requirements of data
5 recipients, thereby allowing the utility to discriminate against firms while concealing
6 the underlying reasons. For example, vaguely-defined cybersecurity requirements
7 could allow RI Energy to claim without evidence or due process that a behind-the-
8 meter battery installer represents a cybersecurity risk and should be denied access
9 to customer data, when in fact the reason is pecuniary: As a non-wires alternative,
10 the battery installer could represent a competitor to RI Energy's capital spending on
11 the distribution grid, the source of the Company's profits. Without a fair and objective
12 set of requirements for data recipients approved by the Commission, the opportunity
13 for anticompetitive discrimination rises significantly. Moreover, if the Commission
14 wanted to exert oversight in this area at a later time, RI Energy would be able to
15 argue that the Commission had already ceded its authority by approving a plan that
16 specifically gave RI Energy the right to determine data recipient requirements.

17 **Q. WHAT IS YOUR CONCLUSION ABOUT THESE RISKS?**

18 A. While I cannot guarantee that these risks will materialize, my experience working
19 across multiple states and utilities for over ten years leads me to conclude that the
20 two risks I mention are very likely to come to pass in Rhode Island. Commission
21 approval of the Company's GBC plan would allow unsupervised behavior by RI
22 Energy that in my experience is likely to be unfair, anticompetitive and undermine

1 the purpose of GBC in the first place. Ratepayers would be better served by not
2 spending any further time or effort implementing GBC.

3 **III. CONCLUSION**

4 **Q. WHAT IS YOUR CONCLUSION?**

5 A. The Commission has limited the scope of the hearing to an up-or-down vote on RI
6 Energy's Green Button Connect plan. While I disagree with the scope limitation, I
7 accept the Commission's authority on this matter. Given that scope constraint, the
8 best decision is for the Commission to reject the Company's GBC plan and reduce
9 the AMF cost cap by \$664,000. With zero track record of success from PPL Corp. or
10 its vendor, GBC is most likely going to be a failed effort. Finally, even if RI Energy
11 achieves some limited form of an operational GBC, it will not provide the information
12 necessary for demand response resources to participate at ISO-NE, undermining
13 key functionality of GBC. Rather than invest in a partial solution that only addresses
14 29% of the necessary information, ratepayers would be better served by eliminating
15 GBC altogether.

16 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

17 A. Yes, and I reserve the right to supplement this testimony based on receipt of further
18 information.

CERTIFICATION

I hereby certify that on April 29, 2026, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Stephanie De La Rosa, Commission Clerk, by electronic mail and regular mail.

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