



May 15, 2023

New Jersey Board of Public Utilities
44 South Clinton Ave., 1st Floor
PO Box 350 Trenton,
NJ 08625-0350

In the Matter of the Community Solar Energy Program Docket No. QO22030153

Community Solar Straw Proposal Comments
Submitted by: **Perch Energy**

Introduction

The following comments are provided by Perch Energy, Inc. DBA (Perch, Perch Community Solar). Perch is the second largest community solar subscriber management organization in the country and is responsible for approximately 14% of all operating capacity nationwide¹. Perch's mission is to expand access to community solar for all. Perch provides customer acquisition and management services to projects that prioritize serving low- and moderate-income customers. To this end, our goal is to support program changes that make it easy for LMI customers to access the benefits of community solar through mechanisms that improve the program for all participants, while also removing unnecessary barriers to the market's expansion.

Perch thanks the Board for their thoughtful program proposal and is greatly encouraged by the balance of the proposed permanent program structure and particularly pleased to see changes to the pilot projects covered in the draft as well. As a firm focused on subscriber acquisition and long-term management of the community solar assets our focus is to secure a program structure that facilitates access and sets up the program and the projects developed for sustained success, and we believe that the inclusion of utility consolidated billing using a net crediting methodology as well as the expanded methods for customer eligibility and easier LMI customer enrollment will help greatly.

¹ Wood Mackenzie US Community Solar Outlook H1 2023.

Perch is a leadership member of the Coalition for Community Solar Access (CCSA) and supports the comments submitted by the coalition and SEIA. Our comments seek to further expand on issues where we have direct experience managing over 500MW across multiple programs including the New Jersey pilot program. Our comments are listed in order of the priority we believe will have the greatest impact on the growth of the program; however, we strongly believe all the recommendations outlined provide substantial benefits to the long-term efficacy and efficiency of community solar in New Jersey. We thank you in advance for considering our suggestions and look forward to a continued dialogue on this matter.

Comments

Bill credits

Staff question 13: *If demand charges are included in the calculation of the bill credit for affordable housing providers, would the proposed calculation process set appropriate rates, as demand is not connected to usage or project production? Would another method more effectively allow affordable housing to participate in community solar?*

Perch's recommendation: Perch applauds the Board's effort to ensure that bill credit values for master-metered affordable housing providers are sufficiently high to both ensure substantial savings for participants and avoid financial disincentives to limit the participation of these customers. Thus, we support the proposal to add demand charges to the value of bill credits for housing providers on commercial rates. The low value of bill credits for housing providers on commercial electricity rates are in our opinion the largest hurdle limiting affordable housing provider's participation in the New Jersey program.

We have firsthand experience with affordable housing providers who have master-metered accounts that serve residents but are on commercial rates (e.g. GS1, GS3, GPL, etc.) and despite their desire to participate and willingness to pass on the majority of the benefits to residents are unable to participate. Their participation is limited because the value of the bill credits i.e. the supply and delivery costs for these customers is less than half of what an average residential rate customer receives which greatly impacts the project economics and often project owners are unable to make the project pencil by allowing these customers to enroll.

We understand that demand charges are not as closely related to usage or project production as supply and transmission charges; however, we believe that allowing master-metered customers to receive bill credits that take into account the demand charges would be fair to the customer as it's the easiest way to approximate a full retail rate that offsets the

majority of the customers charges, excluding fixed costs, and thus is on par with the offset or savings received by residential rate customers. Simply allowing customers to have a larger subscription share alone would not be enough as it would further negatively impact project economics as a greater share of the project would have to be allocated to a customer with significantly lower credit values.

We further encourage the Board to not only apply this change to customers enrolled in projects under the permanent program but also to those in the pilot program and to provide project owners and housing providers reassurance that they too will be able to benefit from this change in the near term. There are pilot projects still seeking to enroll customers and numerous housing providers are eager to participate and anxiously await this change and we believe that assurance from the board that this change is something they will be able to benefit from in the near future could go a long way to finding a way for housing providers to participate immediately despite the lower credit values if there is reassurance there will be a long-term fix.

Participation by affordable housing providers

Staff proposal: *Staff recommends requiring that master-metered housing providers be required to pass on 75% of the electricity bill savings to residents in the form of direct payments at least once per year. Master-metered subscribers shall provide annually to the Board an affidavit that lists the names of residents and total benefits paid. The housing provider may retain 25% of the bill savings to provide general benefits to the residents. Staff also seeks to ensure that residents retain eligibility for affordable housing when they receive community solar bill credits.*

Perch's recommendation:

Perch fully agrees that residents of master-metered housing should be able to access the benefits of participating in community solar, not only those that have a utility account. We have experience speaking with owners and managers of affordable housing providers and they understand the value of participating in this program and the benefits it can provide to residents. We are heartened to see the Board understands that in order for a housing provider to participate and take on the job of distributing benefits to residents, there is a fair amount of work that the property owner/manager must take on and thus some of the benefits of the subscriptions must necessarily be allowed to remain with the housing provider. In our experience, the proposed benefits breakdown (75/25) is workable for a number of housing providers, but we urge the Board to retain flexibility to allow for variations in the commitments housing providers can make and the way these benefits can be delivered to residents by allowing for indirect but benefits that improve resident's quality of

life or expense outlays, especially in cases where a housing provider lacks clear guidance on the impact on public benefits.

We strongly support all efforts to ensure that residents retain eligibility for affordable housing if they receive community solar benefits. Furthermore, we think it's important to ensure that any benefits from community solar are not counted towards utility allowances and guidance should be clear on this. We would urge the board to consider the HUD guidance for the California Solar on Multifamily Affordable Housing (SOMAH) as well as DC's Solar For All Program which as mentioned in a 2022 study, "has provided owners with direction on how to treat the financial benefits residents receive from community solar and allowed uptake of community solar programs in HUD-assisted housing, providing owners and operators with clarity on compliance requirements and ...ensuring benefits for residents"².

Pilot Program Changes

Staff proposal: *Staff recommends that the projects already participating in or approved to participate in the Pilot should implement utility consolidated billing after a transition period. Staff also recommends incorporating the updated provisions regarding project marketing, elimination of the maximum number of subscribers to a project, banking and use of unallocated and excess bill credits, and LMI income verification standards.*

Staff question 26: *Which other provisions of the Permanent Program should or should not also apply to the Pilot?*

Perch's recommendation: Perch urges the Board to extend the recommendation of eliminating the consideration of geographic distance between projects and subscribers universally, including projects in the Pilot program. All projects should be permitted to enroll subscribers living anywhere in the EDC service territory in which the project is located as it provides customers with greater choice, expands access to those in rural areas, and makes enrollment easier – the same reasons cited as justification for the proposal by the Board. If this rule change applies only to projects in the permanent program, projects in the pilot will be at a severe disadvantage, by having to incur significantly higher costs to find and replace customers for the life of the project, despite making commitments to enroll a similar customer composition and providing equivalent benefits. We further encourage the Board to make this change effective immediately to maximize the benefits of community solar for consumers as we wait for the permanent program to open to make community solar more readily available to customers living outside the geographic boundaries set by the selection of specific pilot projects.

² Westmoreland, Lauren and Nevo, Raymond. Community Solar and HUD Subsidized Housing – An Overview of Current Policies, Programs and Practices and the Impact to Tenant Utility Allowances and Income. July 2022

In addition to eliminating the geographic restrictions, Perch also urges the Board provide additional clarity on when the additional proposed changes to pilot projects will become effective and whether these will be applied retroactively. Currently there is confusion about when subscriber organizations will be allowed to use tools like self-attestation to enroll LMI customers and in order to eliminate any potential for bad actors and give all projects equal footing, further guidance on how this change will be implemented, whether it will be retroactive and any compliance elements that must be in place are needed.

LMI Income verification standards

Staff proposal: *Staff recommends expanding the Pilot's list of programs that may be used to verify a subscriber as LMI... Staff also recommends allowing a subscriber to qualify as LMI by providing a written attestation that their gross household income is below 80% of area median income, as defined by HUD. Staff believes that potential community solar subscribers should not be dissuaded from participation by having to produce a tax return, EBT card, or other documentation of income.*

Perch's recommendation: Perch supports the state's equity goals and is prepared to help identify, enroll, and serve LMI subscribers, affordable housing, and other facilities serving Disadvantaged Communities (DACs). We support the expansion of eligible social assistance programs included for proof of eligibility such as Medicaid and SSI programs which typically have higher participation rates than LIHEAP and other programs traditionally used to prove income qualification. Perch also agrees with the Board's recommendation to allow LMI customers to submit as proof of eligibility a self-attestation form indicating they meet the income eligibility criteria. We are familiar with hurdle a high burden of proof presents for customers and how asking customers for sensitive income information can create a sentiment of distrust and fear thus we support eliminating all possible barriers to participation.

Staff proposal: *Staff also recommends requiring self-attestation to be done through a third-party platform or organization who would be responsible for maintaining records.*

Perch's recommendation:

Perch believes customer protection is vital and accordingly already utilizes third-party verification (TPV) for customer enrollment of all residential and LMI customers. We fully support the requirement to validate customer enrollment via independent verification of the customer enrollment through a third-party; however, we do not believe the use of a separate third-party platform alone is the most efficient mechanism to ensure proper implementation of self-attestation. Therefore, we encourage the Board to require registered

community solar subscriber organizations, or their partners engaging in customer acquisition, to use an independent third-party vendor to perform a customer enrollment confirmation for LMI customer enrollment. It is extremely important to ensure that no individual helping to sign up a customer or benefiting from their enrollment can interfere with the verification process.

The verification process should provide flexibility in the process to allow customers to confirm enrollment and eligibility via a follow-up method of their choosing i.e. email, phone, or text. The confirmation should be completed within 48 to 72 hours at most of the customer's application submission. Furthermore, the confirmation must ensure that the customer understands what they signed up for, that the terms and conditions of their contract are clear and that they in fact executed the contract/application. For any LMI customer, it must also provide confirmation that the customer meets the income eligibility and that they signed the self-attestation form during enrollment, if applicable. **The verification should be comprehensive but easy for the customer to complete so this in turn does not become a hurdle to customer enrollment.**

***Staff proposal:** Staff recommends that the Board produce a standardized format for self-attestation, similar to the subscriber disclosure form.*

Perch's recommendation: *Perch supports the proposal to the development of forms with standardized language for all customers in the program to ensure consistent messaging and explanation of the enrollment requirements and customer affirmation.*

Bill credit banking /excess bill credits

Project operators:

Staff proposal: *For project operators, Staff recommends generation not allocated to a subscriber may be banked for up to 12 months from the start of project operation. From that point, the banked credits may be held for 12 additional months to be allocated to new subscribers, after which they shall be compensated at the EDC's avoided cost of wholesale power. Staff believes that two years of operation, in addition to time before completion of construction, should be enough time to subscribe customers for the full capacity of the project without excessive banking.*

Perch's recommendation: We request the Board to allow project operators to bank credits for unallocated capacity for up to two years from the date of generation for the life of the projects not only the first two years of project operation. Based on our experience managing over 130 community solar farms over the past seven years, we have learned that there is a

modest level of natural customer churn that occurs when a customer either moves, sells a business or passes away. This churn is inevitable and outside of the control of all subscription managers and independent of program rules. No matter how happy a customer is with their community solar subscription, there are multiple reasons a customer may terminate their subscription at any time.

It is not uncommon for customers to move or close a utility account and not notify their community solar subscription manager, thus the efforts to replace capacity lost from any of these events cannot begin until the utility notifies the provider that the account is finalized and no credits can be allocated. Replacement customers are not always readily available and the process to submit and process a new customer allocation list takes usually at least one bill cycle, therefore capacity lost from one of these events results in two to three bill cycles of unallocated capacity on average.

It's also key to consider that renters move with greater frequency than homeowners and low- and moderate-income customers are significantly more likely to be renters. A 2021 study showed 16% of renters move each year compared to just under 5% of homeowners³. This is one of the many benefits of community solar, it allows those who do not own their own homes to be able to reap the benefits of clean energy generation. Additionally, most community solar contracts are not long-term commitments. However, the permanent program proposes that community solar projects must subscribe at least 51% of capacity to LMI customers, this in turn means that more than half of the customer base will be significantly more likely to move and result in a churn event and this can happen throughout the life of a project, not only in the first two years of operation. If operators cannot bank and reallocate credits from unallocated capacity beyond the initial period, for the majority of the project's life, they will lose revenue with no recourse by allowing customers the flexibility of no long-term commitments and by favoring a more transient customer base. Thus, not allowing operators to bank credits from unallocated capacity beyond the first two years would unfairly punish operators for events outside of their control.

Customers:

Staff proposal: *For subscribers, Staff recommends credits shall carry over monthly billing periods until the end of an annualized period, the closure of their utility account, or the end of their subscription, at which time excess net bill credits shall be compensated at the EDC's avoided cost of wholesale power. Staff also recommends that subscribers or subscriber organizations may select an annualized period so that their use of banked credits is maximized.*

³ Moving Patterns for US Homeowners and Renters in 2021. Published: May 23, 2022.
<https://www.windermere.com/blog/moving-patterns-for-u-s-homeowners-and-renters-in-2021>

Perch's recommendation: While we strongly support the Board's intent to ensure that customers are sized appropriately and that they do not accumulate excess credits for extended periods of time; but, we strongly encourage the board to consider 1) the ability to bank credits indefinitely, 2) the possibility for customer credit banks not to expire when a customer closes their utility account but rather to allow for those credits to be transferred by the utility to their new account or at minimum returned to the host for reallocation and 3) the ability to return unused credits to a host account when a customer is unenrolled from a community solar project.

In New Jersey, community solar subscriptions are not easily portable when a customer moves, even if they stay within the same utility territory. Therefore, anytime a customer moves and closes their utility account, even if they wish to remain a community solar customer, there is no way for a customer to transfer any unused credits they may have remaining on their first utility account in order to offset future charges on a new account. An easy utility led process to transfer the credits to the new account would be ideal but absent this, if credits are returned to the host, once the new account is established and a customer is re-enrolled their unused credits can be reallocated to them or if they do not wish to remain a customer, they can be allocated to another customer who has the appetite for additional credits.

When a customer is unenrolled from a community solar project either because they chose to terminate their subscription or when they are removed for non-payment, any unused credits remain on the customer's account and the customer is able to continue to benefit from any generation that was allocated to them regardless of whether or not they have paid for these credits. In most all community solar programs, customers benefit from community solar credits an average of two months before the customer is billed or the project owner receives any of the revenue from the project. In a dual billing scenario this is a major concern because the lag between the generation and utility reporting and thus customer billing and collections can result in substantial losses in the event of non-payment. Given the current credit banking rules there is no way for an asset owner to recoup at least the value of any remaining unused credits when the customer is removed from the customer allocation list.

If this change was adopted, at minimum, project owners could redistribute any remaining credits in the event of removal for non-payment. Though non-payment risk is eliminated if a project is enrolled in utility consolidated billing with net-crediting, pilot projects will not have the benefit of consolidated billing immediately and it is feasible that even projects in the permanent program could face delays in accessing consolidated billing if implementation is delayed. At the most recent public stakeholder meeting, utilities and other parties

expressed concern with the implementation timeline in the staff draft proposal; if in fact utilities cannot meet the June 1, 2024, timeline, pilot projects and permanent program projects need a way to reduce the risk of non-payment and this change would help to address this in the near and long term.

The proposed changes listed above follow changes to credit banking rules in New York's community solar program adopted in 2021⁴ to avoid the unnecessary forfeiture of credits. The process has been implemented successfully and Perch strongly encourages the Board to consider adopting these best practices in the credit banking rules for all projects.

Consolidated billing

Staff proposal: *Staff therefore recommends requiring the EDCs to implement consolidated billing for community solar.... Staff recommends that consolidated billing be implemented with the "net crediting" methodology. In this model, subscribers can be directly guaranteed a specified savings rate. The applied bill credit is multiplied by the savings rate, and the product is subtracted from the initial billed amount to determine the final amount billed to the subscriber and paid to the project. This method also allows different savings rates for different subscribers.*

Perch's recommendation: Perch applauds the commission's decision to include consolidated billing in the permanent program and encouraging the use of a net-crediting methodology while allowing for projects to offer multiple savings rates. Perch has seen the success of consolidated billing in New York and how it has made community solar easier to understand and ensured customers are able to receive guaranteed savings each month, an essential need for an LMI customer.

Perch supports the use of a net-crediting mechanism to facilitate the implementation of utility consolidated billing; however, we encourage the Board to adopt a simpler alternative net crediting approach. The staff proposal describes the net crediting methodology as follows:

The applied bill credit is multiplied by the savings rate, and the product is subtracted from the initial billed amount to determine the final amount billed to the subscriber and paid to the project.

⁴ Order Clarifying Banking Rules Under the Community Distributed Generation Program (Case 15-E-0751). New York Public Service Commission, May 17, 2021.

The Board further clarified in the public Stakeholder meeting on April 26th, that “*applied credits*” are defined as the credits that are used to offset a customer’s usage charges, mimicking the current application of credits. Using a simple example: A customer with a 10% bill credit savings, with a subscription that generates \$100 in credits that can be allocated to the customer for that month, who in that same month only has \$60 in charges, will receive only \$6 in savings reducing their monthly costs to \$54 as only \$60 dollar of credits are “applied” against the total charges. In this scenario the utility retains a fee of \$0.60 (1% of the applied credits) and the project owner is paid \$53.40. The customer “banks” the remaining \$40 in credits for use in a future month.

Instead, we propose the following: Utilizing the above example, a customer with a 10 percent savings rate and \$100 in credits from his or her subscription would be able to utilize the full \$100 in credits to determine the customer’s savings. Thus, the customer would realize a total of \$10 in savings reducing their monthly cost to \$50, the utility would collect a fee of \$1 and the project owner would receive a payment of \$89. Additionally, no credits would remain and need to be banked and carried over for future use.

We believe the current net crediting model, creates numerous issues regarding the efficiency of net crediting (including but not limited to payments to CDG Sponsors and credit banking), and will leave CDG customers unable to realize the full benefits of their CDG subscriptions at a time when the credit value is generated. Alternatively, the simplified net crediting methodology allows a customer to reap the full benefit of their community solar generation in the month of generation and allows the project owner to be fully compensated for the value delivered to the grid. Conversely, the proposal simplifies the net crediting billing procedures for the utility by virtually eliminating the need to track customer credit banks. Customer subscription sizes cannot exceed 100% of a customer’s past 12 months of usage prior to enrollment thus it is highly unlikely a customer could ever receive a credit allocation such that the total savings applied in any month would exceed usage charges and require credits to bank for future use, as long as there are no unexpected delays with utility billing and crediting for community solar projects.

However, given experience in other markets, delays in customer billing and crediting can occur and, in such instances, this methodology has the added advantage of again, ensuring that a customer is able to benefit from their subscription fully without being penalized with lower savings or additional delays. Using the first scenario as an example, in a month where a customer would have received \$100 in credits, but a utility delay causes them to receive \$0 credits, a customer with \$50 in usage charges would receive \$0 in savings. If in the next month the utility allocated the prior month’s \$100 in credits and an additional \$80 in credits from their subscription, but the customer only had \$70 in new charges, the customer would

only receive \$7 in savings, and have a remaining \$110 in credits that would continue to roll over unused until a time when their usage costs exceed their new credit allocations. In this scenario the utility would receive a fee of \$0.70 and the asset owner would only collect \$62.30. In this example, the \$5 in savings the customer should have received in the first month cannot be realized until some undetermined period of time, the same principle applies to the utility fees and owner collections. There are instances where the utility can “rebill” a customer to retroactively apply any missed savings and issue a refund to the customer for any monies they paid in excess in a prior month; however, the process to rebill a customer is time consuming and complicated and often results in customer confusion.

If instead, in the second month when the customer had \$180 in available credits, the utility would apply the full value, the customer would instead receive \$18 in savings [$\$180 \times (\text{savings rate of } 10\%)$] allowing them to monetize all their savings in a single month without waiting additional time for a utility to reissue a prior bill or wait for a refund or credit to be used at a later time. The project owners would also be compensated more quickly for the generation already delivered to the grid as they would receive \$160.20 ($\$180 - \$18 - \1.80). This would be especially helpful to both customers and utility billing teams, especially when dealing with multi-month delays which put undue burden especially on project owners who must deal with the inability to collect project revenues or wait indefinitely for delayed revenues while continuing to be required to meet financing repayment obligations. Customer savings, project owner payments and utility fees for consolidated billing should not be limited by a customer’s usage and we believe this method provides significant benefits to all stakeholders.

This alternate net-crediting methodology was introduced for consideration by CCSA and a member company in New York’s Community solar program In the Matter of Consolidated Billing for Distributed Energy Resources 19-M-0463 in December 2020⁵. The proposal was repeatedly lauded for its simplicity and enjoyed broad industry support with only one set of comments not filed in support of the petition⁶. The petition was denied by the PSC but in doing so the PSC cited concerns which do not apply to New Jersey; namely, in New York the joint utilities had begun drafting automation and implementation plans and thus it was argued the change would result in delays to the roll out of consolidated billing which was highly anticipated. Additionally, this methodology would have created a billing mechanism that could not be replicated by legacy projects receiving volumetric crediting. Despite these assertions and the commission’s ruling in July 2021, this methodology was utilized by

⁵ The member company submitting the petition was BlueWave Solar, the former parent company of BlueWave Community Solar which became independent and rebranded as Perch Energy in 2021.

⁶ “Petition of the Coalition for Community Solar Access Regarding Net Crediting Billing”. December 9, 2020. In the Matter of Consolidated Billing for Distributed Resources. Case 19-M-0463.

Niagara Mohawk aka National Grid NY to implement community solar between May 2021 and March 2023, prior to the billing automation for VDER projects due to its “simplicity and given system limitations to implementing the crediting methodology” as noted in the utility’s Net Crediting Manual for Value Stack filed on August 31, 2020 – four months prior to the CCSA petition. Therefore, we have ample evidence that this methodology has been successfully implemented and that at least by one utility’s assertion, the methodology is easier to implement.

As mentioned already, New Jersey utilities have yet to begin drafting automation or implementation plans for consolidated billing and the Board has the ability to consider this alternate proposal before a formal implementation deadline is set. New Jersey has the advantage of being able to benefit from the learnings of other community solar markets who opened earlier but whose growth and success has faced hurdles. New York, despite its leadership in the adoption of consolidated billing via net crediting, has been stalled by delays and the utility’s failure to deliver core services to community solar customers. We believe that this simpler implementation methodology paired with strict deadlines for implementation and clear performance and accountability metrics for utilities to deliver billing and crediting will ensure New Jersey will be able to implement net crediting quickly and accurately, as envisioned by the Board.

A successful and timely implementation of net-crediting will have a far-reaching impact on the success of community solar in New Jersey and its ability to deliver the intended benefits to LMI participants. Perch endorses CCSA/SEIAs recommendations for utility accountability to incentivize utilities to deliver on this requirement and to ensure ratepayers and other market participants have the recourse necessary in the event utilities are unable to fulfill their responsibilities to help make this success possible.

Staff proposal: *Staff recommend establishment of a billing working group or subgroup with representatives from the Board, the EDCs, subscriber organizations, community solar developers, and other stakeholders.*

Perch’s comment: We thank the board for considering the creation of a billing and crediting working group that the utilities must statutorily participate in. As a participant in similar efforts in other states Perch has seen the first-hand collaboration and solutioning that can result from having an ongoing dialogue as well as the increased level of transparency. For organizations involved in the ongoing management of projects this is an invaluable tool and Perch plans to be engaged from Day one in this group if it is approved.

Conclusion

New Jersey's community solar market has the potential to thrive and attract significant federal and private investment, while also benefitting low to moderate income households and disadvantaged communities with direct bill savings. We seek to ensure the long-term success of the New Jersey community solar market and to that end encourage the Board to:

1. Facilitate the participation of affordable housing providers on commercial rates by increasing the bill credit value to a level that ensures equivalent savings and enables project viability and apply this to customers in all projects.
2. Remove the geographic limitation for customer enrollment for pilot projects to ensure that pilot projects are on equal footing to maintain fully allocated projects.
3. Require community solar subscriber organizations to use an independent third-party verification to complete customer enrollment verification for LMI customers, particularly those that sign a self-attestation form as proof of income eligibility.
4. Modify the bill credit banking rules to a) Allow customers banks to never expire, b) Allow projects to bank credits from unallocated capacity for the life of the project and c) Allow unused credits to be returned to a host account when a customer leaves or is removed from a project.
5. Adopt an alternate net-crediting methodology that allows customers to reap the full savings associated with their subscription allocation each month.

The proposed framework and accompanying recommendations will undoubtedly position the state's community solar market as a leader in the industry,

We at Perch Energy express our gratitude for the opportunity to provide feedback and look forward to continued collaboration with the Board Staff to achieve the state's ambitious energy goals through distributed generation.

Respectfully Submitted,

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