



DESAUTEL LAW

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January 18, 2022

VIA ELECTRONIC MAIL & USPS

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

RE: Docket 5189 – The Narragansett Electric Company d/b/a National Grid Annual Energy Efficiency Plan for 2022

Dear Ms. Massaro:

Enclosed herewith for filing please find an original and nine (9) copies of the following document:

1. The SECOND BATCH of the Energy Efficiency Resource Management Council's (EERMC's) Responses to the Rhode Island Public Utilities Commission's (PUC's) Eighth Set of Data Requests Issued January 12, 2022, to the EERMC during the course of the hearings on this docket.

Please be advised that an electronic copy of this document has been sent to the Service List. Thank you for your attention to this matter.

Sincerely,

Marisa A. Desautel, Esq.
Enclosures

cc: Docket 5189 Service List
Updated 12/15/2021

**Docket No. 5189 - National Grid – 2022 Annual Energy Efficiency Program
Service list updated 12/15/2021**

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PUC 8-1

Request:

How long has the client fund been in existence.

Response:

The Rhode Island Office of Energy Resources ("OER") conducted a thorough review of EERMC meeting minutes dating back to January of 2009, to determine the origins of the EERMC client fund. While this fund has been referred to using various terms, including "reserve fund," "client trust fund," and "client fund," it is first mentioned in the January, 2011 EERMC meeting minutes as a "reserve fund" to be used for contingencies.

EERMC's response to the PUC 8-2, below, provides a full narrative of the history of the reserve/client fund, including additional context on fund discussions at various EERMC meetings and the fund's evolution from a reserve fund to the money market account currently holding EERMC funds and referred to as the Client Fund in both meeting minutes and testimony during this docket.

PUC 8-2

Request:

Details on the EERMC Open Meeting where the client fund was discussed/voted on and where the Council discussed year-end reconciliation and transfer with Grid.

Response:

OER reviewed historical EERMC meeting minutes from January, 2009 forward to identify minutes that mention "reserve" funds or "client trust" funds held at the direction of the EERMC. This search included meeting minutes of the full Council as well as its Executive Committee. While different terminology is used to describe the fund over time, there is a relatively consistent purpose for it over the past decade plus. Across multiple Council compositions, multiple chairpersons, multiple outside legal counsel, and multiple Executive Directors and support staff, the EERMC has maintained that, in most years, it has been appropriate to reserve funding allocated to it under statute to carry out its enumerated powers and duties over time.

Listed below are the mentions identified, some brief context of each mention, and notation of Council votes, where applicable. Hard copy versions of all noted meetings are attached as well.

The first mention of any type of "reserve" fund identified is in the January 2011 minutes, in which Council Member Anthony referenced a \$182,000 reserve fund which could be used for contingencies. The reference is made within the context of printing annual plans and supporting legal services.

The creation of a "client trust fund" is evidenced in the December, 2011 minutes. The client trust fund was established with a \$12,000 refundable retainer for the legal services of Attorney Dan Prentiss through a motion by Council Member Justynski, seconded by Council Member Ryan, and approved unanimously. Also, in that month, the Council had discussion of funding a gas opportunity report in 2012 using unallocated funds from 2011. Council Member Anthony made a motion to authorize National Grid to transfer \$180,000 to a client trust fund held by the Council's lawyer, Attorney Dan Prentiss, for the primary purpose of conducting this opportunity report. The motion was seconded by Council Member Justynski and passed by a 6-0 vote with one abstention.

The \$180,000 set aside at the end of 2011 was discussed again in October 2012. Council Member Anthony noted that the Gas Opportunity Report cost \$100,000, so the EERMC had \$80,000 that needed a purpose. The Council member suggested that a budget subcommittee of Council Members Powell, Anthony, and Gold develop recommendations for the subsequent meeting. There is no further discussion in November, but the \$80,000 was referenced again in December, 2012.

Also, in December 2012, it was noted that the retainer fund held by the Council's lawyer, Attorney Dan Prentiss, had \$9,000 remaining in it, which would be sufficient to "cover his expenses for 2013; the cost for printing and assembling the Annual Report; funding for members to participate in workshops; and possible funding for EE & SR studies the Council may commission."

In January 2013, Council Member Anthony reviewed a draft budget for the upcoming year. Of the \$80,000 identified as remaining in the client trust fund (held by EERMC's lawyer Prentiss), it was recommended that "\$30,000 be spent on the PACE Program and \$30,000 for RE consulting," leaving \$20,000 in the account. Also, it is noted that, of the \$12,000 legal services retainer held by Attorney Prentiss, \$8,980 remained and would serve as the budget for legal services that year. Further, a reserve fund injection of \$250,980 to "support additional needed expenditures" was discussed. The minutes state, "In 2011, the council saw the need for a Natural Gas Opportunity Report, so \$180,000 was put aside to do it and the money was put into a trust fund with Dan Prentiss...the Council should be looking about [*sic*] other things on the horizon that the council any [*sic*] want to do with this revenue. This could include further EE studies or an energy forum." It was proposed that council members send suggestions about reserve fund spending. The minutes continued: "Joe N. asked if calling it a reserve fund has been a problem. Abigail A. said there has been no problem with calling it a reserve fund, but she does not want to spend the money just for the sake of spending it. Unspent money goes back to the ratepayer to lower bills. Jeremy N. said the reserve fund is a function of the increased SBC charge. More SBC means more administration money to pay staff and work on programs. Abigail A. said the Council could designate that unused funds go to the ratepayers and make it clear in the budget." The Council took a vote to approve the budget as presented, which was approved unanimously.

In March 2013, a discussion occurred around planning of and participation in a Rhode Island Energy Expo. It was noted that the Council had a reserve fund of \$251,000. A draft resolution calling for a set-aside of up to \$100,000 to support such an event, if executed, was circulated and approved unanimously following a motion by Council Member Anthony and a second by council Member Ryan.

In January 2014, the Council considered and voted on its annual budget. The minutes reflect a brief discussion related to funds held for future purposes: "Mr. Newsome brought up the idea of changing the name of the "reserve fund" so it does not appear that the funds are not being used. Ms. Anthony suggested that Ms. Sholly revise the budget to list possible uses for projects or activities under the reserve fund." The budget was ultimately approved, as presented, by a unanimous vote following a motion by Chairman Powell and a second by Council Member Newsome.

At the February 2015 Executive Committee meeting, Consultant Team member Mike Guerard "recommended that the Council make sure to allocate the remaining ~\$26,000 being held in an account with Dan Prentiss." He also proposed that those funds be utilized to pay anticipated expenses associated with the Dunsky financing study then underway.

In August 2015, the Council discussed funding the continuation of consultant-led studies identifying various energy efficiency financing strategies by sector. The result was a unanimous vote by the board, following a motion by Council Member Stubblefield-Loucks and a second by Council Member Verrengia, "to secure the services of an expert consultant for technical and policy support related to energy efficiency financing for an amount up to \$70,000, as needed, to be held in an escrow account of Council's legal counsel." This matter was followed up on in October 2015, when Dunsky was selected to serve as an expert finance consultant to the EERMC. A motion was made by Council Member Bacon and seconded by Council Member Verrengia that authorized a \$70,000 budget to be transferred to the EERMC Legal Counsel's client fund to support this work. It carried unanimously.

At the November 2015 Executive Committee meeting, OER staff member Ucci recommended that the EERMC consider allocating \$50,000 and \$70,000 into the Counsel-administered client fund to support Energy Expo activities and Finance Study work, respectively, in 2016. A recommendation was also made for the Council to consider moving unexpended funds from their 2015 budget into the same client fund to support unanticipated work products throughout 2016. Later in that meeting, the minutes note that "the Executive Committee agreed to recommend to the full Council the following 2015 budget changes: transfer \$50,000 to a client fund by the end of 2015 to support the 2016 Energy Expo, consistent with an existing budget allocation; transfer \$70,000 to a client fund by the end of 2015 to support finance study work in 2016, consistent with an existing budget allocation...and direct that any remaining funds in 2015 be transferred to a client fund to support Council initiatives in 2016, at their discretion." Later in November, at the full Council meeting, it was approved unanimously that uncommitted 2015 funds be moved into the attorney's client fund for use in 2016, following a motion by Council Member Cirillo and a second by Council Member Verrengia.

At the March 2016 meeting, Council Chairperson Powell noted that the EERMC had, at the time, a \$290,000 balance in its budget and that the Council had previously moved such funds to a client fund held by counsel. A number of ideas for use of these funds were discussed, but no action was taken.

At the December 2016 meeting of the Council, materials show that the client fund would have an anticipated budget of \$125,430 beginning January 1, 2017, of which \$90,000 had been reserved to support the ongoing energy efficiency financing study work by Dunsky.

In December 2017, the Council voted to move remaining funds at the end of the calendar year to the Client Fund for use in 2018. The motion was made by Council Member Verrengia, seconded by Council Member Stubblefield-Loucks, and approved unanimously.

In January 2019, Council Chair Powell noted that staff was working with legal counsel to verify the client fund balance through an internal audit. There was believed to be funds in the account not initially shown in the 2019 draft budget document provided at the meeting. The Chair noted that an update would be given in February once staff and legal counsel fully reviewed balances over the past five years. Indeed, in February 2019, staff filed a memorandum with the Council reporting that an internal audit had been completed and the total amount of dollars in the client fund had been corrected. Two errors had been identified causing the client funds to be underestimated in the previous meeting: a) a human error in transitioning between spreadsheets used to track funds/expenses and b) budgeted values rather than actual, contracted amounts were used in some cases when calculating client fund balances. These errors resulted in balance values that differed from the actual client fund account. Staff noted that "to remedy these errors going forward, the following process changes" would be implemented: a) quarterly check-ins will be conducted in collaboration with the Client Fund manager (the EERMC's attorney) to verify not only the deposits and withdrawals from the Client Fund, but also the total remaining dollar amount; and b) the spreadsheet used to track the Client Fund balance will contain distinct fields that separately track approved budgeted amounts, contracted amounts, and expenses paid-to-date. The memo also noted that funds were being moved into an interest-bearing account, which would accrue to the fund balance. The result was that, in January 2019, the client fund had a beginning balance of \$397,570. After subtracting anticipated line-item expenses, the unallocated amount heading into the remainder of 2019 was \$30,247.64.

PUC 8-4

Request:

Question whether the funds are protected against creditors.

Response:

It is the EERMC and legal counsel's understanding that funds in the Money Market account are considered assets of the EERMC and, as such, would not be subject to creditor attachment or seizure. As evidenced by the Escrow Agreement between the EERMC and its legal counsel, the

funds in the Money Market account are maintained by legal counsel as custodian only, and are not considered an asset of legal counsel.

PUC 8-6

Request:

Explanation of EERMC process for historically saving funds for future potential studies.

Response:

Upon further review, the EERMC understands that it did not have a formal process for saving funds for the purpose of conducting potential studies prior to 2020, when the current savings plan was developed. This savings plan was developed in response to the most recent market potential study process as a way to both spread costs more evenly across multiple years, rather than accruing them all in one or two years, as well as to ensure sufficient funds are reserved and available to conduct these important studies approximately every six years.

PUC 8-8

Request:

All minutes of EERMC that relate to establishment of client account. Hard copy in pdf.

Response:

All relevant meeting minutes referring to the reserve/client fund are contained in the response to PUC 8-2.

For ease of reference, the first mention of a "reserve" or "client" fund is found in January of 2011 and the establishment of the current interest-bearing Money Market Account, as referenced in testimony by Mr. Cleveland, is in February of 2019.

PUC 8-10

Request:

Does Optimal have a separate contract with its subcontractors that speaks to management and oversight for the benefit of the EERMC?

Response:

Optimal Energy maintains contracts with its subcontractors for its work with the EERMC. These contracts are managed under Optimal Energy's prime contract, which refers to services to be provided for the benefit of the EERMC.

PUC 8-11

Request:

Explanation of \$100,000 transfer between Citizens accounts in client account.

Response:

The referenced \$100,000 transfer was made from Desautel Law's Operating Account to EERMC's Money Market account. The \$100,000 deposit was required to be made in-person because of the size of the transaction and was then electronically transferred to the EERMC account.

PUC 8-12

Request:

Copy of trust agreement between EERMC and Desautel Law.

Response:

Attached, please find a copy of the executed trust agreement between the EERMC and Desautel Law.

PUC 8-13

Request:

RFP for last 3 years for Consultant Team to EERMC. Copies of last 3 RFPs for consultant team and results of those RFPs.

Response:

Attached please find the most recent three (3) Request for Proposals (RFPs) issued by the EERMC for consultant services, issued in 2014, 2017, and 2020.

The results of those three (3) RFPs can be found in the meeting minutes at which the winning bidder was selected in response to each of those RFPs. Specifically:

2014 RFP selection at the November 2014 meeting

2017 RFP selection at the November 2017 meeting

2020 RFP selection at the November 2020 meeting

PUC 8-14

Request:

Nathan Cleveland's spreadsheet with breakdown of funds that he testified about. Also copies of the invoices and records of payments for the two entries referenced in PUC 3-2. (Please provide the breakdown and documentation originally requested.)

Response:

Attached please find an Excel spreadsheet documenting the breakdown of funds in the Main Fund and Client Fund for the EERMC in 2021, as referenced by Mr. Cleveland in his testimony

on January 11, 2021 in Docket #5189. The EERMC also notes that this spreadsheet is the basis for the quarterly budget updates shared with the EERMC throughout the year.

Furthermore, as requested in PUC 3-2, please find attached the contracts in support of item a. 2021 Public Education Contracted Expenses and also attached, invoices in support of item b. Payment of 2020 Contractual Expenses. Items a. and b. are also broken down into line items below in alignment with the backup documentation referenced above.

- a. 2021 Public Education Contracted Expenses
 - i. K-12 Curriculum Development and Teacher Training - GBRI, not to exceed amount of \$44,890.00
 - ii. Energy Education & Outreach - Duffy & Shanley, not to exceed amount of \$30,000.00
 - iii. Energy Education Video Development & Production - Duffy & Shanley, total contract not to exceed amount of \$75,000 - \$41,250 of which is budgeted to EERMC, split between the Client Fund (\$10,000, represented as part of the \$92,390 from PUC 3-2) and the Main Fund (\$31,250, not included in calculating Client Fund expenses in PUC 3-2)
 - iv. 2021 URI Farm Energy Fellow – OER/EERMC cost share, EERMC share not to exceed \$7,500
- b. Payment of 2020 Contracted Expenses
 - i. December 2020 Desautel Law Invoice - \$6,682.50 - Paid
 - ii. December 2020 EERMC Consultant Team Invoice - \$74,080.98 - Paid
 - iii. Farm Energy Resource Guide Printing, Meridian Printing - \$495.00 - Paid
 - iv. NEED Project 2020 K-12 Curriculum and Teacher Training - \$29,600 - Paid
 - v. 2020 URI Farm Energy Fellow - \$7,500 - Unpaid

Payment records for the 2020 Contracted Expenses listed above are contained in the Excel sheet attached in response to PUC 8-5. Those line items are reproduced here for convenience as well, and EERMC notes that item v. 2020 URI Farm Energy Fellow is currently unpaid and so no payment record will appear for this item.

2/5/2021 - Desautel Law – \$2,484.27
2/10/2021 - Optimal Energy - \$74,080.98
2/10/2021 - Meridian Printing - \$495.00
2/23/2021 - Desautel Law - \$4,198.23
12/15/2021 - NEED Project - \$29,600.00

Request:

Discrepancy between December, 2021 bank statement and PUC Data Request #2-2.

Response:

The data provided in response to PUC 3-1, which was based on the numbers used in response to PUC 2-2, were accurate as presented in the submission. The EERMC Client Fund bank balance on 12/31/2021 was \$301,413.48, and the response to PUC 2-2 and PUC 3-1 indicating the expected year-end balance of the EERMC client fund of \$200,512.60 is also accurate if contracted expenses and subsequent additions are included.

Table 1 below illustrates the line items which comprise the difference between the active bank balance of the EERMC Client Fund on 12/31/2021 and the expectations underlying the responses to PUC 2-2 and PUC 3-1, which attempted to demonstrate the unallocated funds in the EERMC account at year end.

Table 1 – Difference between 12/31/21 EERMC Client Fund Balance and Year-End Balance Presented in PUC 2-2 and PUC 3-1

12/31/2021 EERMC Client Fund Bank Balance	\$301,413.48	From Money Market Bank Statement
2021 Public Education Contracts	-\$92,390.00	Contracted Expenses not yet paid, but for which funds have been allocated – itemized in PUC 8-14
EERMC Retreat	-\$650.00	Contracted expenses not yet paid, but for which funds have been allocated
EERMC Website	-\$350.00	Contracted expenses not yet paid, but for which funds have been allocated
2020 URI Energy Fellow	-\$7,500.00	Contracted expenses not yet paid, but for which funds have been allocated
November and December 2021 Earned Interest	-\$10.88	Additions to Client Fund balance not yet accrued in response to PUC 2-2 and 3-1
2021 Client Fund Year-End Balance	\$200,512.60	Year-End Balance as represented in PUC 2-2 and 3-1
Savings for Future Potential Study	-\$200,000.00	Funds in the client account allocated towards a future potential study
Unallocated Client Fund Year-End balance	\$512.60	Funds on 12/31/21 in the Client Account which have not yet been allocated to a contractual purpose

Request:

Difference between reconciled table 1 and Table 2 in PUC Data Request #2-2 that Nathan Cleveland testified about.

Response:

The data provided in response to PUC Data Request 2-2, Table #1 was accurate at the time it was developed and submitted to the Commission. When estimating the potential amount of rollover funds at year end 2021, the maximum contracted value for Consultant and Legal Services were used and the expectation was that the Energy Education Video work would be invoiced as well.

When meeting with National Grid staff to reconcile accounts and calculate the exact amount of funds that would be rolled over into the EERMC Client Fund, actual billed values at the time of the meeting were used. Because the December expenses for Consultant and Legal Services had not yet been received, there was a delta between actual billings through November of 2021 and the respective maximum contracted amounts. Additionally, the energy education videos were not completed and thus not invoiced and so the funds associated with that line item were also included in the rollover calculation. Table 1 below demonstrates how the estimated rollover of \$135,922 as provided in PUC 2-2 became the actual rollover amount of \$199,626.77 as confirmed with National Grid.

Table 1 – Calculation of Actual 2021 Rollover relative to Estimated Rollover in PUC 2-2

Estimated Rollover to Client Fund	\$135,922.00	From PUC 2-2 response
Energy Education Videos	+\$31,250.00	Not invoiced in 2021 as expected; work ongoing
Consultant Services Delta	+28,224.35	Max contract value of \$700,000 minus 2021 actual billings through November 2021 of \$671,775.65
Legal Services Delta	+4,230.42	Max contract value of \$46,400 minus 2021 actual billings through November 2021 of \$42,169.58
Actual Rollover for 2021	\$199,626.77	Confirmed with National Grid

Note on 2021 Consultant Services Contract Amount

In the process of preparing these record requests, the EERMC has also identified a discrepancy in the materials supporting the modified scope of work and associated budget of the consultant team that was approved at the June 2021 meeting. The memo provided for the June 2021 meeting by the consultant team in support of their increased scope of work and associated budget listed an original 2021 budget of \$631,000 and a requested increase of \$69,000 to support the additional scope of work, which if approved would bring their contractual maximum for 2021 to \$700,000.

In approving the scope of work adjustment, “Ms. Verrengia made a motion to approve the requested \$69,000 increase in funding allocated to consultant services in 2021 and to approve the proposed changes to the consultant scope of work as written by Optimal Energy. If any of this funding increase is unused by the end of 2021, the remainder shall return to the unallocated pool of the EERMC’s funds for 2022. OER shall also update the contract with the EERMC to reflect these budget and scope of work changes. Mr. Garlick seconded the motion and it passed by a 5-1 roll call vote.”

The discrepancy lies in the fact that the original 2021 contract for the consultant team approved by the Council at the November 2020 meeting in fact had a budget of \$631,263 and so an approved increase of \$69,000 to that budget as voted upon should have resulted in a contractual maximum for 2021 of \$700,263 for consultant services. In addition to being mathematically accurate, this higher amount of \$700,263 is supported by the original contract and the updated scope of work document submitted by the consultant team to OER after the June 2021 vote was taken by the Council for inclusion in an updated contract.

Because the document shared as part of the meeting in which the vote to modify the 2021 scope of work and increase the consultant services budget indicated a contractual maximum of \$700,000 we feel it is appropriate to continue using that amount as the understood contract amount for 2021 at this time, but also wanted to ensure the record reflected the discrepancy once discovered.

PUC 8-17

Request:

Copies of Invoices/Estimates for 2021 that have not been paid yet including, but not limited to invoice/estimate for Optimal Energy for December 2021.

Response:

Attached are the following documents, which represent currently unpaid invoices for the EERMC for 2021, as well as contracts for work that was started in 2021 but will not be completed and invoiced for until 2022.

2021 Invoices to be Paid:

December 2021 Desautel Law Invoice - \$18,502.22
December 2021 Consultant Team Invoice - \$52,908.25
2021 Farm Energy Fellow - \$7,500.00

Contracted Work begun in 2021 which remains ongoing, and will be invoiced in 2022:

Contracts for these projects were submitted as part of the response to PUC 8-14.
K-12 Curriculum Development and Teacher Training - GBRI, not to exceed amount of \$44,890.00
Energy Education & Outreach - Duffy & Shanley, not to exceed amount of \$30,000.00

Energy Education Video Development & Production - Duffy & Shanley, total contract not to exceed amount of \$75,000 - \$41,250 of which is budgeted to EERMC