



OCEAN RENEWABLE ENERGY COALITION

The National Trade Association for Hydrokinetic and Marine Renewables

September 10, 2009

COMMENTS OF THE OCEAN RENEWABLE ENERGY COALITION TO THE INTERAGENCY OCEAN POLICY TASK FORCE

I. OVERVIEW

The Ocean Renewable Energy Coalition (OREC) appreciates this opportunity to submit comments to the Ocean Policy Task Force on the issues raised in President Obama's June 12, 2009 ocean policy memorandum. We commend the Task Force for tackling the daunting challenges of ocean management and recognizing the importance of climate change to the discussion of ocean management policy.

In these comments, OREC will explain the potential role of marine renewables in meeting our nation's energy, economic, environmental and security needs. Moreover, we will emphasize that marine renewables are a critical element of sound ocean management policy and how marine renewables can mitigate the effects of climate change, which poses a grave threat to our oceans as was acknowledged in the President's policy memorandum.

We will also describe the unique hurdles, such as funding shortages, jurisdictional conflicts and regulatory overkill that this emerging industry confronts on the road to commercialization. Inflexible ocean management policies, creation of new levels of management, lack of coordination between state and federal ocean planning initiatives or moratoria on offshore renewables development as management programs are developed will exacerbate the obstacles that the marine renewables energy industry now faces and drive it overseas to "bluer" pastures.

As requested by the Task Force, our comments will focus on (1) the appropriate framework and implementation strategies to meet the objectives of

national ocean policy and allow for environmentally responsible and economically viable development of marine renewables projects and (2) briefly address the issue of coastal and marine spatial planning, including a summary of developments on the state level and the relationship to marine renewables projects. Specifically, we believe that the Task Force should incorporate the following principles in developing ocean management policy:

***Address uncertainties through robust monitoring and adaptive management.** The Task Force should refrain from endorsing a precautionary principle that would discourage development in the face of uncertainty, and instead should endorse the testing and phased development of projects through robust monitoring and adaptive management. Such monitoring and adaptive management programs should be designed with the assistance of federal and state resource agencies on a project-by-project basis to inform and support their existing regulatory authorities. As data gaps are closed, all parties will gain the certainty necessary to consider additional phases of project development.

***Avoid Moratoria.** Imposing a moratorium on deployment of marine renewables projects while an ocean management policy is finalized will drive these fledgling companies overseas and prevent collection of data on operational and environmental project impacts which could inform planning efforts.

***Recognize the potential impact of Task Force rules changes on capital markets.** Changing rules for siting projects at a time when FERC and MMS have finally implemented a workable framework creates regulatory uncertainty, which increases risk and deters private investment in offshore renewables.

***Promote flexibility.** A sound ocean management policy should, to the extent possible, avoid designating zones for exclusive use rather it should encourage compatible use. A compatible-use model gives marine renewable energy project developers an incentive to innovate and design projects that are capable of co-existing with a multitude of other ocean uses.

***Gather information.** Sound ocean management policy decisions and marine spatial planning must be based on adequate baseline data rather than speculation. Data collection is an integral part of any successful ocean management program and must receive adequate funding for comprehensive ocean planning to succeed. Data on environmental and other natural conditions can be used by developers to inform their decisions about project siting and by regulators and other stakeholders in reviewing, approving or commenting on project proposals. Data collection should be prioritized to obtain data necessary to inform existing regulatory approvals.

***No new bureaucracy.** Each new marine renewable project faces dozens of regulatory approvals before moving forward. This byzantine process takes significant time and resources to manage. Federal, state and local regulatory agencies should be encouraged to work together to ensure their approvals are consistent and to streamline their approval processes and timing. Otherwise,

however, the Task Force should decline to add more regulatory requirements to this process, which by all accounts is comprehensive to a fault and leaves no resource unprotected.

***Establish a coordinated, comprehensive approach to permitting offshore renewables through use of MOUs and creation of a uniform application.** Offshore renewables developers deal with at least a dozen or more federal, state and local permitting authorities, each with their own discrete regulatory mandate. Creating a uniform application containing all information required by agencies to process a permit request will cut down on costs for applicants and government agencies alike and will encourage collaboration all stakeholders. A uniform application would facilitate creation of a uniform schedule, with milestones and enforceable deadlines. These new procedures could be implemented via MOUs between the participating agencies, with an agency such as CEQ or a private party available for dispute resolution or mediation.

***Avoid jurisdictional conflicts:** Currently, several states, including Oregon, New Jersey, Rhode Island and Massachusetts are engaged in marine spatial planning initiatives, some within their own territorial waters, other as far out as twenty miles. Any federally-led planning initiative must coordinate with state programs to avoid placing a marine renewables project in an untenable situation where a developer starts a project in state waters but is prohibited from extending it into federal waters because of prohibitions under federal ocean management policy.

***Ensure that any planning process for offshore renewables is synchronized with state and regional planning efforts and policy making for the electric utility industry:** The five year planning process currently used by the Minerals Management Service (MMS) for oil and gas leasing is not appropriate for offshore renewables, where development is driven by state policies such as renewable portfolio standard (RPS) and regional and utility planning efforts on procurement and transmission. Any planning process must reflect the realities of the electric power industry and incorporate sufficient flexibility to enable marine renewables developers to capitalize on favorable state policies or utility procurement decisions.

II. BACKGROUND

A. OREC's Interest in the Proceeding

The Ocean Renewable Energy Coalition (OREC) is a national trade association representing the marine renewable energy industry, including wave, tidal, hydrokinetic, current, ocean thermal energy conversion (OTEC) and, in collaboration with other trade associations, offshore wind, solar and biomass. Founded in 2005 with just four members, OREC now stands 45 members strong,

reflecting the increased interest in and commitment to OREC's mission of advancing the commercialization of marine renewables in the United States.

Development of marine renewables technologies can play a significant role in our nation's economic recovery and expand our renewable energy portfolio. According to the Electric Power Research Institute, ocean renewable energy in the United States has the potential to supply some 400 terawatt hours of clean power annually, or roughly ten percent of today's electric demand. This is more than the electric generation currently delivered from all conventional hydropower plants in the United States.

A robust marine renewables energy industry advances other national economic, energy and environmental goals by:

- Producing renewable, emission-free energy from our nation's abundant ocean resources, thereby mitigating climate change effects – which is one of the goals outlined in the President's Memorandum.
- Reducing our nation's reliance on oil imported from the Middle East, Venezuela and other politically volatile areas;
- Revitalizing shipyards, coastal industrial parks and shuttered naval bases;
- Creating green jobs in coastal communities hit hard by our country's current economic crisis;
- Securing our nation's place in developing offshore renewable energy technologies thereby ensuring that the United States is an exporter, not an importer, of these technologies;
- Providing low cost power for niche or distributed uses like desalinization, aquaculture, naval and military bases, powering stations for hybrid vehicles and for offshore oil and gas platforms; and
- Promoting coastal planning that reflects the goals of bio-diversity, and optimal use of resources which contemplates synergistic gains for all offshore industries.

B. Unique Hurdles of Marine Renewables

1. Undercapitalization

Marine renewables face several unique hurdles as they transition from concept to commercialization. First, in contrast to other renewables such as wind or solar, marine renewables did not receive any significant federal funding until FY08, which provided \$10 million to the Department of Energy to revive its water power and hydrokinetic program (which had been defunct since the

early 1990s) and issue a first round of solicitations for grants. Since that time, appropriations have increased to \$30 million for FY 09 which, while welcome, hardly compensates for past neglect.

Second, while the potential of marine renewables is enormous, the industry stands at the same place as wind power fifteen years ago. Though offshore wind projects are now commercially viable and can be financed through power purchase agreements, marine renewables have only just reached the stage where the first generation of demonstration projects are ready for deployment.

Although the first generation of marine renewables projects are small in size and lack the same private backing and access to capital as more mature energy technologies, nevertheless, they are required to comply with the same lengthy siting procedures applicable to well-established technologies. For example, Verdant Power needed five years to acquire authorization to install a 30 kilowatt turbine array in the East River near New York City and Ocean Power Technologies (OPT) is embarking on the fourth year of its efforts to site a 2 megawatt project off the coast of Reedsport, Oregon.

The lengthy permitting process consumes scarce resources which are better used for perfecting the technologies which, in turn, would expedite commercialization. Moreover, permitting uncertainty deters private equity investors who, at present, are the primary source of capital for this nascent industry. As such, marine renewables developers have serious concerns about any system which will further delay siting or create more regulatory uncertainty for the first generation of marine renewables projects.

2. Unknown impacts

Because only two marine renewables projects have been sited in the United States and only a handful more abroad, little is known about the real-world environmental, social and economic impacts of marine renewables projects. Consequently, marine renewable energy project developers are often unable to comply with resources agencies' requests for information without engaging in years of costly studies. For now, we advocate application of principles of adaptive management which allows for rigorous post-deployment monitoring and changes in operation to address adverse impacts as an alternative to extensive pre-siting studies. Adaptive management will also allow for collection of data that can inform MSP and future siting decisions.

Uncertainty regarding impacts also makes marine renewables inappropriate candidates for the precautionary principle. A policy of prohibiting action in the face of uncertainty would essentially bar any new technologies, including marine renewables, because questions about impacts cannot be resolved without actually siting these projects and gathering data.

3. Conflicting and overlapping jurisdictional requirements

Marine renewables also suffer a second disadvantage in addition to their emerging status and undercapitalization. Specifically, marine renewables are subject to overlapping jurisdictions of multiple agencies, more so than any other offshore renewable. For example, marine renewables on the outer continental shelf (OCS) are regulated by both the Federal Energy Regulatory Commission (FERC) (for licensing) and the Mineral Management Service (MMS) (for leasing). Moreover, the existing “sweet spot” for wave energy technologies (based on existing technology, cost and operational viability) lies roughly two to five miles offshore, thus straddling state submerged lands and the OCS. Consequently, marine renewables are potentially subject to ongoing state coastal planning initiatives as well as any federal policies proposed by the Task Force. Because of the problem of multiple jurisdictions, coordination between federal and state programs as well as between FERC and MMS takes on heightened significance for marine renewables developers.

4. Constraints of utility industry

As with offshore wind (*see* AWEA Comments on Policy Framework (August 14, 2009), marine renewables do not fit within the five year planning process established for oil and gas under the Outer Continental Shelf Lands Act (OCSLA). Electricity from marine renewables is sold by contract to utilities, which have long-term planning processes for wholesale power procurement and transmission planning that must comply with federal, state and regional initiatives. The five year planning process for oil and gas is out of synch with the electric utility planning process and is unworkable for marine renewables.

C. Other ongoing efforts

1. State planning

As the Task Force moves forward with steps towards MSP, it must bear in mind that several coastal states are already undertaking their own initiatives. Consider:

Massachusetts: Massachusetts recently issued a draft of its comprehensive ocean management plan, as required by the Massachusetts Oceans Act of 2008. Following a round of public input, the final plan will be issued by the end of the year. [Cite: <http://tinyurl.com/5uvuxb>].

Oregon: Oregon is embarking on a survey of the ocean floor off its coast as part of a plan developed in conjunction with California and Washington State to map the Pacific Ocean off all three state coasts by 2020. [Cite: http://www.seattlepi.com/local/6420ap_or_ocean_floor_mapping.html] The maps will be used to make decisions about establishing marine reserves and siting wave energy projects.

New Jersey: The New Jersey Department of Environmental Protection is concluding an 18-month biological assessment of a study area that extends

between 3 to 16 miles offshore.. This study, not meant as a replacement for an EIS, will help inform and guide the placement of offshore wind farms.

Rhode Island: Rhode Island is involved in an extensive ocean planning effort which can be considered in the vanguard of MSP initiatives.. The state's Special Area Management Plans (SAMPs), many of which have been in place for 30 years, are now being updated to create a more unified system of ocean zones. As part of RI's CZM planning in the 1980s, the state's Coastal Resources Management Council (CRMC) zoned all coastal ocean areas by assigning rankings ranging from Type 1 areas that receive the highest level of protection to Type 6 areas designated for industry and transportation. The SAMP process is now being reviewed to assign more specific use designations and produce maps for fisheries, renewable energy projects and other potential uses. The Rhode Island plan extends 20 miles offshore and thus will compete directly with federal efforts.

In light of all of the activity on the state level, the Task Force must carefully coordinate federal efforts with state planning efforts. Many of the models for MSP from Europe may not be appropriate for use in the United States because of our system of dual state-federal jurisdiction.

2. Industry outreach

OREC and its member marine renewable energy developers are committed to environmentally responsible, economically viable development of ocean renewables projects. OREC and its members work closely with the resource agencies, NGOs and coastal communities to devise a workable approach to siting marine renewables in an expeditious and environmentally benign manner.

To this end, OREC has negotiated legislation (S. 1462 - provisions on Adaptive Management and Environmental Grant Program) that would establish an Adaptive Management Fund which developers can use to underwrite environmental studies and ongoing post-deployment monitoring for demonstration and early-stage commercial projects. Information subsidized by the Adaptive Management Fund would be placed into the public domain (in contrast to many environmental studies performed in connection with permitting which remain proprietary if the project does not move forward) to inform future decision-making. As added protection against environmental harm, projects receiving adaptive management funds would be required to cease or alter operation if unacceptable environmental impacts are observed during post-deployment monitoring. OREC has also supported legislation that would provide funding to coastal states to study and map their coastal resources and make such information publicly available.

These carefully negotiated initiatives provide a course for moving forward cautiously, even in the face of some uncertainty and a means to gather the information that is critical to the success of MSP efforts. The Task Force should

take these voluntary efforts into account when crafting an ocean management plan.

III. COMMENTS

For the near term, OREC recommends that the Task Force begin to address uncertainties regarding marine renewables technologies through adaptive management, robust monitoring and data gathering. OREC does not oppose MSP in principle nor do we object to laying the framework for eventual incorporation of MSP in national ocean policy. However, MSP is only as effective as the data and input upon which it is based – and gathering the baseline information needed to implement MSP will take time and funding. In the interim, many of the goals of MSP – such as a coordinated approach to ocean development and identifying compatible uses – can also be pursued for the near future within the parameters of existing regulatory processes with some modifications or improvements and through application of adaptive management principles.

Below, we discuss the principles that the Task Force should consider in developing a framework for ocean management as well as some of the improvements which can be made to existing policy to achieve some of the goals of MSP without either (a) freezing development while waiting to implement MSP or (b) rushing to impose MSP in a way that further complicates siting of marine renewables.

1. The Task Force should avoid moratoria on development while devising a framework for ocean management or implementing MSP.

Imposing a moratorium on deployment of marine renewables projects while an ocean management policy is finalized will drive these fledgling companies overseas and prevent collection of data on operational and environmental project impacts which could inform planning efforts. Developing a comprehensive MSP program takes considerable time and resources. UNESCO's recent Guide to MSP (May 2009) emphasizes the importance of data collection to MSP but acknowledges the time consuming nature of this activity:

Collecting and collating spatially-explicit databases is usually the most time consuming aspect of planning and management activities. In conducting a review of available data, you should look for spatial information that covers most of the marine area. It is often unproductive to spend time collecting fine-scale data sets for small sub-areas of the management area because, when taken together, they are frequently not comparable.

Data can be collected from many sources including: (1) scientific literature; (2) expert scientific opinion or advice; (3) government sources; (4) local knowledge; and (5) direct field measurement. Most spatial planning efforts rely heavily on the first three sources of data,

although local knowledge is increasingly recognized as a valuable source of information for spatial planning. New direct field measurements are expensive and time-consuming, and should be kept to a minimum, especially in the initial round of planning. Later, after important knowledge gaps have been identified, some field work may be undertaken. Most initial data collection and mapping can be done through specialized inter-agency working groups and by consulting experts on various topics [UNESCO Report at 53]...

Another important task is compiling information and mapping the spatial and temporal distribution and density of important human activities in the marine management area. Important human uses include both commercial and recreational fishing; marine transportation; renewable and non-renewable energy production; and sand and gravel mining, among others. Examples of human activities in marine areas are listed in Table 7. The distribution of species, communities and habitats is very diverse and therefore some areas are biologically or ecologically more valuable than others. The same is also true for human activities. Some areas are more economically valuable than others, such as: sand and gravel deposits; oil and gas deposits; areas of high-sustained winds; fishing grounds; and marine transport routes. These areas are important to identify and map.

The time involved to develop MSP is not hypothetical. The UNESCO MSP Website describes the Canadian experience with MSP at http://www.unesco-ioc-marinesp.be/msp_practice/canada_lomas. According to the site, Canada enacted legislation on MSP in 1997 and only in 2007, did it implement MSP for one region, the East Scottish Shelf. A decade long moratorium on development is simply not tenable for the marine renewables industry, or indeed any other offshore renewable.

Moreover, delaying deployment of marine renewables will actually slow MSP efforts, rather than moving these efforts forward.. Because the impacts of marine renewables are uncertain, developers must be allowed to deploy the first generation of projects in small arrays to gather information on operational and environmental effects. This data will inform ocean management and MSP decision making.

2. Adaptive management should be recognized as the preferred approach for siting marine renewables and addressing concerns related to ocean management

Adaptive management is the preferred approach to the precautionary principle. Adaptive management recognizes that new technologies may have unknown effects. Therefore, the more practical approach is to replace extensive pre-deployment studies (which would prove little since effects are unknown) with rigorous post-deployment monitoring and mitigation (such as removal of a

project unit or operational changes to respond to adverse effects). The marine renewables industry supports adaptive management and has invested significant resources in implementing this approach. Moreover, adaptive management will yield the information necessary for effective ocean management and siting decisions in the long term.

An all or nothing application of the precautionary principle could ban new technologies like marine renewables since uncertainty about impacts cannot be resolved until the projects are sited subject to ongoing monitoring. These technologies have very localized and manageable impacts and further, offer the added benefit of producing clean renewable energy which helps to achieve the goals of climate change identified as a priority in the Task Force's memorandum. With adaptive management the precautionary principle is not necessary since any adverse effects can be mitigated or corrected and if not, operations can be curtailed.

3. The Task Force must avoid creating additional uncertainty which would effectively stop capital formation in this industry

Changing rules for siting projects at a time when FERC and MMS have finally implemented a workable framework creates regulatory uncertainty, which upsets investor expectations and deters private investment in offshore renewables.

Marine renewables companies have waited four years for FERC and MMS to resolve jurisdictional disputes on the OCS. During that waiting period, several developers cancelled or downsized projects to avoid this regulatory conflict. The Task Force must avoid creating more uncertainty.

In addition, many companies have finally developed responsible strategies for siting projects, including community outreach and adaptive management. The costs of siting under existing regimes are well known and thus allow investors to calculate their risk. Changing the regulatory regime again will wreak havoc on private investment and drive it from this fledgling industry.

4. The Task Force should leave the door open for future innovation. A sound ocean management policy should, to the extent possible, avoid creating exclusive zones that bar certain types of development and instead, encourage compatible use. A compatible-use model gives marine renewables developers incentives to innovate and design projects that are capable of co-existing with a multitude of other ocean uses.

5. The Task Force should ensure that ocean management or MSP is informed by adequate data. Sound ocean management policy decisions and marine spatial planning must be based on adequate baseline data rather than speculation. Data collection is an integral part of any successful ocean management program and must receive adequate funding for comprehensive

ocean planning to succeed. Data on environmental and natural conditions can be used by developers to inform their decisions about project siting.

As noted earlier, the UNESCO Report reached the same conclusion, emphasizing the significance of data collection to ocean management and MSP.

6. The Task Force should recognize the differences between oil and gas and marine renewables. The Task Force should not lump all “offshore energy” together in developing an ocean management plan. There are several significant differences between marine renewables and oil and gas that warrant different treatment:

*Marine renewables combat climate change, a goal of the President’s Memorandum.

*Marine renewable siting is more complex because power must be delivered to shore through state lands. Thus, federal and state processes require coordination. By contrast, many oil and gas facilities are beyond state regulation and do not directly impact state waters.

*As discussed earlier, the planning process for marine renewables and other utilities does not fit within the five year oil and gas planning process.

*Marine renewables projects lack the substantial funding of the oil and gas industry and lack the financial resources to comply with onerous requirements.

*The impacts of marine renewables are uncertain and cannot be known without deployment. Thus, the precautionary principle should not apply. By contrast, many of the impacts of oil and gas development are well known.

7. The Task Force should avoid creation of a new bureaucracy: Marine renewables developers already deal with dozens of agencies on the federal, state and local level during the siting process. Adding another level of siting review is not desirable and will delay marine renewables development.

Instead, the Task Force should focus on ways to further streamline siting and increase cooperation between agencies (see next recommendation).

8. The Task Force should establish a coordinated, comprehensive approach to permitting offshore renewables through use of MOUs and creation of a uniform application. Offshore renewables developers deal with at least a dozen or more federal, state and local permitting authorities, each with their own discrete regulatory mandate. Creating a uniform application containing all information required by agencies to process a permit request will cut down on costs for applicants and agencies alike and encourage collaboration among all stakeholders. In particular, a uniform process would encourage each agency to take a broader view of the permitting process and obtain a sense of the context for issuance of its individual permits. The uniform application might

also inspire agencies to come up with suggestions for co-existing uses – (which is also a goal of MSP) instead of simply rejecting a proposal.

Creating a uniform application process would facilitate creation of a single processing schedule, with milestones and enforceable deadlines since all participants would be dealing with the same information. These new procedures could be implemented without additional authorization via MOUs between the participating agencies.

9. **The Task Force should avoid jurisdictional conflicts:** As discussed earlier, several states, including Oregon, New Jersey, Rhode Island and Massachusetts are engaged in MSP initiatives, some within their own territorial waters, other as far out as twenty miles. Any federally-lead planning initiatives must coordinate with activities on the state level to avoid placing a marine renewables project in an untenable situation such as one where a developer starts a project in state waters but is prohibited from building it out into federal waters because of prohibitions under federal ocean management policy. Marine renewables projects are particularly vulnerable to federal –state conflicts because the sweet spot for wave energy development lies two to four miles out, at the boundary of state and federal waters.

10. **The Task Force should endeavor to synchronize ocean management or planning initiatives with state and regional planning efforts and policy making for the electric utility industry.** The five year planning process currently used by the Minerals Management Service (MMS) for oil and gas leasing is not appropriate for offshore renewables, where development is driven by state policies such as renewable portfolio standard (RPS) and regional and utility planning efforts on procurement and transmission. For example, a state may offer certain incentives such as renewable energy credits or a feed-in tariff which are limited to projects in service by a certain date. If the state's incentives are offered at the beginning of the five year planning cycle, a developer might not be able to site a project in time to avail itself of these benefits. Likewise, a utility's planning process often starts ten years out. However, a marine renewables developer might not be able to submit a bid in response to a utility's competitive procurement program because with the restrictions of the planning process, the developer might not be able to secure site access to allow it to meet the construction deadlines required by the terms of the procurement.

The Task Force should ensure that any planning process ultimately developed reflects the realities of the electric power industry and incorporates sufficient flexibility to enable marine renewables developers to capitalize on favorable state policies or utility procurement decisions.

11. **The Task Force must appreciate the difficulties inherent in MSP and proceed cautiously, without slowing the marine renewables industry or sacrificing the goal of fighting climate change.** The Presidential Memorandum states that ocean management is important because of the impacts of climate

change on our nation's oceans. Marine renewables can provide clean renewable energy and thus, are fully compatible with the goal of fighting climate change. However, an onerous management policy which hastily implements MSP may delay the emergence of marine renewables technologies which can help combat climate change.

At present, there are a limited number of economically viable marine renewables sites due to multiple site-related considerations e.g. grid inter-connection proximity, adequate wave/tidal resource and appropriate bathymetry.. MSP (and in particular, carelessly executed and hastily implemented MSP) could potentially foreclose some or all of these sites from development based on conjecture about potential impacts, without an opportunity to allow these projects to prove their compatibility and compliance.

IV. CONCLUSION

Marine renewables offer enormous potential to combat climate change and to provide an indigenous source of clean, renewable energy. Over the past five years, the marine renewables industry has gained momentum with respect to technology advancements and an influx of federal and state funding. Stalling deployment of marine renewables at this critical juncture could devastate the industry and drive it overseas.

Because of the unique hurdles that a nascent industry like marine renewables face, OREC urges the Task Force to avoid attempts for a "one size fits all" or universal solution. With respect to marine renewables, the best approach is to allow for deployment to move ahead in an environmentally responsible manner which incorporates robust monitoring, adaptive management principles and encourages coordination between the relevant permitting agencies through use of uniform applications and process schedules and collaboration. Data gleaned from monitoring operation of the first generation of marine renewables projects can offer insight into marine renewables' environmental effects and its compatibility with other ocean uses. Ultimately, information gleaned can be used to inform siting decision and future ocean management initiatives.

Once again, OREC thanks the Task Force for this opportunity to comment on the issue of ocean management. Both Sean O'Neill, OREC President (sean@oceanrenewable.com) and Carolyn Elefant, Counsel to OREC (Carolyn@carolynelefant.com) are available to respond to any additional questions that the Task Force may have.