U.S. Department of Energy
Hanford Site

November 9, 2022

Mr. Will Evans
Reveal from the Center for
Investigative Reporting
P.O. Box 8307
Emeryville, CA 94608

Dear Mr. Evans:

FREEDOM OF INFORMATION ACT REQUEST (FOI 2023-00094)

This office is in receipt of your Freedom of Information Act (FOIA) request seeking the Certificates of Transfer and Attestation forms received by this office for renewable energy certificates from Jan. 1, 2022, through present. In your request you asked for a waiver of fees. Your request for a fee waiver has been granted.

Your request was assigned to the U.S. Department of Energy (DOE), Richland Operations Office, Infrastructure & Services Division to conduct a search of its files and the enclosed documents were located. The search started on Oct. 21, 2022, which is the cutoff date for responsive documents. After review, DOE has determined that certain information should be withheld from the documents pursuant to Exemptions 3 and 4 of the FOIA, 5 USC 552.

Within the documents, we have deleted Taxpayer Identification Numbers pursuant to Exemption 3 of the FOIA. Exemption 3 incorporates into the FOIA laws that restrict the availability of specific information. To qualify under this exemption, a statute must require information to be withheld in such a manner as to leave no discretion to the agency. Statute 26 USC 6103, "Confidentiality and disclosure of returns and return information," is such a statute. This statute prohibits the release of Taxpayer Identification Numbers.

As provided in 10 CFR 1004.11(c), Orion Renewable Energy Trading Group LLC was given the opportunity to identify those parts of the requested information that should be protected from disclosure under the FOIA and to provide the basis for any such claim. Orion has confirmed portions of the requested information should be withheld.

I have reviewed the claims of proprietary interest in the documents and have evaluated each part alleged by Orion to be proprietary. I have concluded that, apart from the information noted "deleted," the material contained in the documents can be released. The deleted information is exempt from disclosure in accordance with 10 CFR 1004.10(b)(4), FOIA Exemption 4.

Exemption 4 of the FOIA was meant to protect the disclosure of "trade secrets and commercial or financial information" that is privileged or confidential. Information is deemed "commercial or financial" as long as the submitter has a "commercial interest" in it (Pub. *Citizen Health Research Group v. FDA*, 704 F.2d 1280, 1290 [D.C. Cir. 1983]). If the documents you are requesting were released in their entirety, the public could gain insight into Orion's business practices, basic commercial operations, financial information, and pricing strategies, which are unique to them and have been developed at their expense. The result of such a release would place them at a competitive disadvantage by giving their competitors insight into how they do business.

Orion has asserted that the following information is confidential business information: 1) Facility Name; 2) Address of Facility; 3) Facility ID Number; 4) Information that could identify the name of the Facility or Facility owner; 5) Bank routing and account information; and 6) Serial numbers. Orion asserts that this information is customarily treated as confidential and not generally available to the public.

In interpreting the FOIA, courts have upheld that information may be withheld if disclosure would be likely to impair the government's ability to obtain similar information in the future. If such information were released, it would clearly impair the government's ability to obtain the most favorable terms in future procurements, contractual arrangements and endeavors with third parties because companies would be less willing to risk disclosure of their information. Therefore, DOE is withholding confidential business information in the responsive documents.

The last step in our disclosure analysis is conducted pursuant to the FOIA Improvement Act of 2016 and the related attorney general's memo dated March 15, 2022, which prescribe that DOE assess whether there is foreseeable harm when considering disclosure of records to the public. Based on the submitter's assertions, we have determined that there is foreseeable harm in disclosing the redacted information, and therefore are unable to disclose the redacted information in the responsive documents.

Please see our response to you dated August 17, 2022, for additional documents that fell within the requested time period and were previously provided to you in response to your request assigned FOIA tracking number 2022-00995.

The undersigned individual is responsible for this determination. You have the right to appeal to the Office of Hearings and Appeals, as provided in 10 CFR 1004.8. Should you choose to exercise this right, your appeal must be filed within 90 days after receipt of this letter. You may submit your appeal by email to OHA.filings@hq.doe.gov, including the phrase "Freedom of Information Appeal" in the subject line (this is the method preferred by the Office of Hearings and Appeals). Alternatively, any such appeal may be made in writing to the following address: Director, Office of Hearings and Appeals (HG-1), U.S. Department of Energy, L'Enfant Plaza Building, 1000 Independence Avenue SW, Washington, D.C. 20585-1615. The appeal must contain all the elements required by 10 CFR 1004.8, including a copy of the determination letter. Should you choose to appeal, please provide my office with a copy of your appeal. Thereafter, judicial review will be available to you in the Federal District Court either (1) in the district where you reside, (2) where you have your principal place of business, (3) where DOE's records are situated, or (4) in the District of Columbia.

You may contact the DOE Hanford Site FOIA Public Liaison, Richard Buel, at (509) 376-3375, or by mail at P.O. Box 550, Richland, Washington, 99352 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, email at ogis@nara.gov; telephone at (202) 741-5770; toll free at 877-684-6448; or facsimile at (202) 741-5769.

If you have any questions regarding this matter, please contact me at (509) 376-6288.

Sincerely,

-Original signed by-

Dorothy Riehle
Freedom of Information Act Officer
Hanford Site Office of Communications

HOC:DCR

Enclosures

INVOICE

Orion Renewable Energy Trading Group LLC

INVOICE # 091422-010
DATE: SEPTEMBER 14, 2022

1732 1st Avenue
Suite 29139
New York, NY 10128
Phone: (917) 702-4899

(b)(3):26 U.S.C.

Taxpayer ID#:
DUNS#: 962782517

TO DOE Richland
P.O. Box 550 (H5-20)
Richland, WA 99352
Reference M0RECERTIFICATE on invoice.
IPAC Agency Location Code: 89-00-0001
DUNS: 03-445-6186
Treasury Account Symbol: 89X0251
NAICS: 562910
Cage Code: 37WT7

DUE DATE
Net 30

QTY (MWH)	DESCRIPTION	UNIT PRICE	LINE TOTAL
43,883	CLIN0001, Any/all RECs, FY22 RECs for DOE - Richland, Renewable Energy Certificates (RECs) per DLA Energy Contract Number Contract No. BOA - SP0604-22-G-8001.	$1.23	$53,976.09
	PO M0RECORION		

Wire Payment Information:
Beneficiary: Orion Renewable Energy Trading Group LLC
Bank Name: (b)(4)
Bank Address: (b)(4)
Bank Telephone: (b)(4)
Routing Number: (b)(4)
Account Number:

SUBTOTAL	$53,976.09
SALES TAX	N/A
TOTAL	$53,976.09

REC CERTIFCATE OF TRANSFER

Orion Renewable Energy Trading Group, LLC certifies that title to the Renewable Energy Certificate(s) in the amounts described below, associated with power generation from the Renewable Resource(s) listed below, have been transferred to the **DOE - Richland** in accordance with the terms of the **DLA Energy Contract No. BOA - SP0604-22-G-8001** for the quarterly contract performance period **2022.**

The Renewable Energy Certificate(s) transferred to the **DOE - Richland** include emissions, and other environmental characteristics associated with renewable resources. The Renewable Energy Certificate(s) do not include energy, capacity, or other attributes of electrical power.

Orion Renewable Energy Trading Group, LLC represents and warrants that the environmental attributes, including any attendant emission credits, that are the subject of this Certificate of Transfer have not been and will not be sold, reserved, or conveyed to any party other than the **DOE - Richland** and that the electric power generated in association with these Renewable Energy Certificate(s) has not been represented to retain or possess, and will not be represented as retaining or possessing such attributes.

The Renewable Energy Certificate(s) that are the subject of this Certificate of Transfer are based upon the generation of electricity from **Municipal Solid Waste** at (b)(4) placed in operation (b)(4) and located in (b)(4) **(Zip** (b)(4) **)** between the dates of **4/1/2021** and **12/31/2021**. The total amount of Renewable Energy Certificates covered by this Certificate of Transfer is: **43,883.**

Orion Renewable Energy Trading Group, LLC

Joe Barclay, CEO
9/14/2022

FORM A: RENEWABLE ENERGY CERTIFICATES (REC) ATTESTATION *FROM THIRD PARTY MARKETER*

I, (print name and title) Joe Barclay, Chief Executive Officer, declare under penalty of perjury, on behalf of (name of REC provider) Orion Renewable Energy Trading Group, LLC, that

1) all the RECs associated with this invoice were generated by eligible renewable energy generators as defined in the subject Agreement;

2) all the renewable attributes, including any emissions reduction credits or emissions allowances, represented by the REC sales reported in REC Certificate of Transfer were transferred to the Government (list Agency) **DOE - Richland** ; and

3) the renewable attributes represented by the REC sales reported in Renewable Energy Certificate of Transfer were not and will not be sold, marketed or otherwise claimed by a third party

REC Product

Generating Facility	MWh Generation	From (date)	To (date)	Fuel Type
(b)(4) Tracking System: MRETS MRETS ID: (b)(4) COD (b)(4)	43,883	4/1/2021	12/31/2021	Municipal Solid Waste

I further declare that the RECs claimed for the REC products LISTED ABOVE and reported in the REC Certificate of Transfer were sold once and only once, and that the electrical energy that was generated with the RECs reported in the REC Certificate of Transfer was not and will not be sold, marketed or otherwise represented as renewable energy and was not and will not be used to meet any federal, state or local renewable energy requirement, renewable energy procurement, renewable portfolio standard, or other renewable energy mandate. As an authorized agent of the aforementioned Company, I have authority to submit this report on the company's behalf.

Signature

9/14/2022
Date

New York
Place of Execution

Transaction Confirmation

M-RETS
Renewable Electricity

Date: 09-13-2022

M-RETS Organization: (b)(4)

Retiring 377894 active RECs

Account	ID	Project	Fuel Type	Vintage	Location	Quantity	Serial Number
Orion Active	(b)(4)		Municipal solid Waste	2021-12-01	(b)(4)	50117	(b)(4)
Orion Active			Municipal solid Waste	2021-11-01		33226	
Orion Active			Municipal solid Waste	2021-08-01		44657	
Orion Active			Municipal solid Waste	2021-06-01		47747	
Orion Active			Municipal solid Waste	2021-10-01		50575	
Orion Active			Municipal solid Waste	2021-07-01		46840	
Orion Active			Municipal solid Waste	2021-09-01		40115	
Orion Active			Municipal solid Waste	2021-05-01		19550	
Orion Active			Municipal solid Waste	2021-04-01		45067	

Retirement reason:

Beneficial Ownership - For Environmental Benefit

Retirement reason details:

Period: 2022

Notes: Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales

to this retirement account

Orion Renewable Energy Trading Group, LLC Federal Government FY22

M-RETS hereby declares this transaction confirmation shall serve as proof that the above transaction was completed on the date listed.

Date Started	Date Ended	Source Organization	Destination Organization	Source Account	Destination Account	Transaction Type	Status	Fuel Type	Fuel Source	Retirement Type	Retirement Reason	Retirement Notes	Compliance Period	Retired To	Compliance/Voluntary	M-RETS ID	Facility Name	Generator Location	Eligibility	Vintage	Serial Numbers	Quantity
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC	(b)(4)		Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary	(b)(4)	(b)(4)		N/A	2021-09-01	(b)(4)	40115
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-05-01		19550
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-04-01		45067
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-12-01		50117
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-11-01		33226

Date Started	Date Ended	Source Organization	Destination Organization	Source Account	Destination Account	Transaction Type	Status	Fuel Type	Fuel Source	Retirement Type	Retirement Reason	Retirement Notes	Compliance Period	Retired To	Compliance/Voluntary	M-RETS ID	Facility Name	Generator Location	Eligibility	Vintage	Serial Numbers	Quantity
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC	(b)(4)		Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary	(b)(4)			N/A	2021-08-01	(b)(4)	44657
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-06-01		47747
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-10-01		50575
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-07-01		46840

(b)(4)

https://app.mrets.org/reports/public/generators

(b)(4)

INVOICE

Orion Renewable Energy Trading Group LLC

INVOICE # 091422-009
DATE: SEPTEMBER 14, 2022

1732 1st Avenue
Suite 29139
New York, NY 10128
Phone: (917) 702-4899

Taxpayer ID#: (b)(3):26 U.S.C.
DUNS#: 962782517

TO DOE Richland
P.O. Box 550 (H5-20)
Richland, WA 99352
Reference M0RECERTIFICATE on invoice.
IPAC Agency Location Code: 89-00-0001
DUNS: 03-445-6186
Treasury Account Symbol: 89X0251
NAICS: 562910
Cage Code: 37WT7

DUE DATE
Net 30

QTY (MWH)	DESCRIPTION	UNIT PRICE	LINE TOTAL
23,117	CLIN0001, Any/all RECs, FY22 RECs for DOE - Richland, Renewable Energy Certificates (RECs) per DLA Energy Contract Number Contract No. BOA - SP0604-22-G-8001.	$1.23	$28,433.91
	PO M0RECORION		

Wire Payment Information:
Beneficiary: Orion Renewable Energy Trading Group LLC
Bank Name: (b)(4)
Bank Address: (b)(4)
Bank Telephone: (b)(4)
Routing Number: (b)(4)
Account Number:

SUBTOTAL	$28,433.91
SALES TAX	N/A
TOTAL	$28,433.91

REC CERTIFCATE OF TRANSFER

Orion Renewable Energy Trading Group, LLC certifies that title to the Renewable Energy Certificate(s) in the amounts described below, associated with power generation from the Renewable Resource(s) listed below, have been transferred to the **DOE - Richland** in accordance with the terms of the **DLA Energy Contract No. BOA - SP0604-22-G-8001** for the quarterly contract performance period **2022.**

The Renewable Energy Certificate(s) transferred to the **DOE - Richland** include emissions, and other environmental characteristics associated with renewable resources. The Renewable Energy Certificate(s) do not include energy, capacity, or other attributes of electrical power.

Orion Renewable Energy Trading Group, LLC represents and warrants that the environmental attributes, including any attendant emission credits, that are the subject of this Certificate of Transfer have not been and will not be sold, reserved, or conveyed to any party other than the **DOE - Richland** and that the electric power generated in association with these Renewable Energy Certificate(s) has not been represented to retain or possess, and will not be represented as retaining or possessing such attributes.

The Renewable Energy Certificate(s) that are the subject of this Certificate of Transfer are based upon the generation of electricity from **Municipal Solid Waste** at (b)(4) placed in operation (b)(4) and located in (b)(4) **Zip** (b)(4) between the dates of **4/1/2021** and **12/31/2021**. The total amount of Renewable Energy Certificates covered by this Certificate of Transfer is: **23,117.**

Orion Renewable Energy Trading Group, LLC

Joe Barclay, CEO
9/14/2022

FORM A: RENEWABLE ENERGY CERTIFICATES (REC) ATTESTATION *FROM THIRD PARTY MARKETER*

I, (print name and title) Joe Barclay, Chief Executive Officer, declare under penalty of perjury, on behalf of (name of REC provider) Orion Renewable Energy Trading Group, LLC, that

1) all the RECs associated with this invoice were generated by eligible renewable energy generators as defined in the subject Agreement;

2) all the renewable attributes, including any emissions reduction credits or emissions allowances, represented by the REC sales reported in REC Certificate of Transfer were transferred to the Government (list Agency) **DOE - Richland** ; and

3) the renewable attributes represented by the REC sales reported in Renewable Energy Certificate of Transfer were not and will not be sold, marketed or otherwise claimed by a third party

REC Product

Generating Facility	MWh Generation	From (date)	To (date)	Fuel Type
(b)(4) Tracking System: MRETS MRETS ID: (b)(4) COD (b)(4)	23,117	4/1/2021	12/31/2021	Municipal Solid Waste

I further declare that the RECs claimed for the REC products LISTED ABOVE and reported in the REC Certificate of Transfer were sold once and only once, and that the electrical energy that was generated with the RECs reported in the REC Certificate of Transfer was not and will not be sold, marketed or otherwise represented as renewable energy and was not and will not be used to meet any federal, state or local renewable energy requirement, renewable energy procurement, renewable portfolio standard, or other renewable energy mandate. As an authorized agent of the aforementioned Company, I have authority to submit this report on the company's behalf.

Signature

9/14/2022
Date

New York
Place of Execution

Transaction Confirmation

M-RETS Renewable Electricity

Date: 09-13-2022

M-RETS Organization: (b)(4)

Retiring 377894 active RECs

Account	ID	Project	Fuel Type	Vintage	Location	Quantity	Serial Number
Orion Active	(b)(4)		Municipal solid Waste	2021-12-01	(b)(4)	50117	(b)(4)
Orion Active			Municipal solid Waste	2021-11-01		33226	
Orion Active			Municipal solid Waste	2021-08-01		44657	
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Orion Active			Municipal solid Waste	2021-10-01		50575	
Orion Active			Municipal solid Waste	2021-07-01		46840	
Orion Active			Municipal solid Waste	2021-09-01		40115	
Orion Active			Municipal solid Waste	2021-05-01		19550	
Orion Active			Municipal solid Waste	2021-04-01		45067	

Retirement reason:

Beneficial Ownership - For Environmental Benefit

Retirement reason details:

Period: 2022

Notes: Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales

to this retirement account

Orion Renewable Energy Trading Group, LLC Federal Government FY22

M-RETS hereby declares this transaction confirmation shall serve as proof that the above transaction was completed on the date listed.

Date Started	Date Ended	Source Organization	Destination Organization	Source Account	Destination Account	Transaction Type	Status	Fuel Type	Fuel Source	Retirement Type	Retirement Reason	Retirement Notes	Compliance Period	Retired To	Compliance/Voluntary	M-RETS ID	Facility Name	Generator Location	Eligibility	Vintage	Serial Numbers	Quantity
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC	(b)(4)		Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary	(b)(4)			N/A	2021-09-01	(b)(4)	40115
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-05-01		19550
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2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-11-01		33226

Date Started	Date Ended	Source Organization	Destination Organization	Source Account	Destination Account	Transaction Type	Status	Fuel Type	Fuel Source	Retirement Type	Retirement Reason	Retirement Notes	Compliance Period	Retired To	Compliance/Voluntary	M-RETS ID	Facility Name	Generator Location	Eligibility	Vintage	Serial Numbers	Quantity
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2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-06-01		47747
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-10-01		50575
2022-09-13 14:30:20 UTC	2022-09-13 14:30:20 UTC			Orion Active	Orion Renewable Energy Trading Group, LLC Federal Government FY22	retirement	complete	Municipal solid Waste	An energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste	Beneficial Ownership	For Environmental Benefit	Retired for Orion Renewable Energy Trading Group, LLC for FY22 Federal Government REC Sales	2022	N/A	voluntary				N/A	2021-07-01		46840

(b)(4)

https://app.mrets.org/reports/public/generators

(b)(4)