STATE OF NEW JERSEY  
Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Trenton, New Jersey 08625-0350  
www.nj.gov/bpu/  

CLEAN ENERGY  

IN THE MATTER OF THE CLOSURE OF THE  
SREC REGISTRATION PROGRAM PURSUANT  
TO P.L. 2018, C. 17  
DOCKET NO. QO19010068  

Parties of Record:  
Stefanie A. Brand, Esq., Director, New Jersey Division of Rate Counsel  

BY THE BOARD:  

In this Order the Board provides Staff's current forecast for the month in which 5.1% of the kilowatt-hours sold in the State will be generated by solar electric generation facilities connected to the distribution system ("5.1% Milestone").  

BACKGROUND AND PROCEDURAL HISTORY  

On May 23, 2018, Governor Murphy signed P.L. 2018, c. 17, codified at N.J.S.A. 48:3-51-87 into law ("Clean Energy Act" or "CEA" or "Act"), effective immediately. The CEA effected many changes to the legal and regulatory framework for solar development. One of the most significant changes is the directive that once the Board determines that the 5.1% Milestone has been achieved, the Board shall close the SREC Registration Program ("SRP") to new applicants. On June 22, 2018, the Board approved a rule proposal to amend the RPS rules governing the SRP at N.J.A.C. 14:8-2.4 to conform to this mandate.¹  

On August 6, 2018, the Board's proposed rules were published in the New Jersey Register with a sixty-day public comment period with comments due by October 5, 2018.² Seven entities responded to the rule proposal and three entities jointly filed comments. Rate Counsel supported the rule proposal as consistent with and properly implementing the CEA. MSSIA questioned the definition of "attainment" in the law and suggested several possible definitions. The other three  

¹ IM/O Rulemaking to Implement Certain Sections of P.L. 2018, c. 17, Regarding Closing the SREC Program to New Registrations Following the Attainment of 5.1% Total Kilowatt-hours Sold in the State from Solar Electric Power Generators Connected to the State's Electric Distribution System, BPU Docket No. QO18060647, June 22, 2018.  
² 50 N.J.R. 1708(a).
commenters recommended alternative approaches to determining attainment of the 5.1% milestone and sought more detail on the sources of data and the analytic methods used to calculate 5.1% of kilowatt-hours sold.

On August 7, 2019, the Board approved a rule proposal addressing the methodology for determining the percentage of solar electric kilowatts sold, an approach for the Board to report on progress toward the attainment of the 5.1% milestone, and the implications of that milestone for project registration length. In the August rule proposal, based upon solar installation and retail sales data available through July 2019, the Board projected that the 5.1% milestone would be achieved "on or about June 2020". Six sets of comments on the proposed rule amendments were received by the November 15, 2019 deadline.

On December 6, 2019, following numerous stakeholder meetings and iterative revisions to Staff’s straw proposal, the Board approved a Transition Incentive program to provide solar incentives for projects that were unable to commence commercial operations prior to the Board’s determination that the state has attained the 5.1% Milestone. The Board approved a factorized Transition Renewable Energy Certificate ("TREC") to serve as the Transition Incentive ("TI") for those projects that have registered in the SRP and remain in good standing at the time of 5.1% Milestone attainment but have not commenced commercial operations at that time. In an order to be considered separately on this agenda, Staff recommends that the Board clarify that the existing registration process be kept open after attainment of the 5.1% Milestone so that projects that remain in compliance with the requirements of that registration process after the 5.1% Milestone will be eligible for the TI until registration for the Successor Incentive is opened.

**CALCULATION OF THE 5.1% MILESTONE**

Pursuant to the rule amendments adopted in another docket on this Agenda, monthly estimates of the percentage of solar electricity within total retail kilowatt-hours sold are to be provided beginning six months prior to the estimated month of attainment of the 5.1% Milestone. Based upon the most current estimates, we are now within the six months of the 5.1% Milestone. However, the Board notes that this figure could change as a result of any input provided by stakeholders, as discussed below.

The CEA's mandate to close the SREC program to new applications upon the attainment of the 5.1% Milestone requires the Board to compare solar electricity generation and retail electricity sold over the same time period. In other words, the Board must compare the kilowatt-hours of solar electric generation during a given twelve-months with the total kilowatt-hours sold during the same twelve months. However, the lack of current data on both solar generation and retail electric sales makes determining this ratio difficult.

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3 IM/O N.J.A.C. 14:8-2.4 Amendments to the Renewable Portfolio Standard Rules on Closure of the SREC Registration Program Pursuant to P.L. 2018, c. 17 (Rule Proposal), BPU Docket No. QX19060720, August 7, 2019. The rule proposal was approved August 7, 2019 and published in the September 16, 2019 New Jersey Register with comments due November 15, 2019.

To implement the statute and rule, the Board will estimate solar electric generation on the basis of installed solar capacity as that capacity is reported on a monthly basis from the SRP through New Jersey's Clean Energy Program ("NJCEP"). The amount of installed capacity and the amount of solar irradiance is different each month; each project's SREC eligibility begins upon a date determined by the local EDC's issuance of a Permission to Operate or "PTO". Given these variables, a schedule of twelve months of solar output factors must be applied to the cumulative installed solar capacity in each month to accurately estimate the amount of electricity produced by the fleet of statewide installed solar.

To estimate monthly statewide solar electricity production, Staff have adapted the Board- approved protocol for measuring solar generation used in the SRP.\(^5\) The Board's protocol for measuring annual productivity of New Jersey solar installations has historically employed an estimate of 1200 kilowatt-hours per kilowatt of installed capacity, measured in DC. This estimate is derived from the National Renewable Energy Laboratory solar estimation tool PV Watts and is based upon typical meteorological data collected from Newark and Atlantic City weather stations.

However, Staff acknowledges that actual solar electricity generation from the fleet of New Jersey solar installations will depart from the Board's estimation protocol. Several variables are at work. Actual weather conditions over the preceding twelve months inevitably differ from the assumptions made by the model. In addition, the actual average fleet-wide solar installation parameters deviate from the solar installation parameters used in PV Watts. During the period from Energy Year 2014 through Energy Year 2018, for example, PJM-EIS found that SREC creation averaged 1169 kilowatt-hours per kilowatt (dc) rather than the 1200 kilowatt-hours historically used by the Board.\(^6\) (See Appendix A)

Similarly, current monthly retail electricity sales data is not immediately available. Staff relies upon the reports of electricity load served by Third Party Suppliers and Basic Generation Service Providers ("TPS/BGS providers") through PJM-EIS GATS for Board-jurisdictional load. PJM Interconnection LLC, manager of the regional wholesale electricity market, provides load served data to its unregulated affiliate PJM-EIS, which manages the Generation Attributes Tracking System ("GATS") used to track New Jersey's RPS. GATS makes available to state RPS administrators, on a regular basis, load served data that can be easily differentiated to identify the entities obligated to comply with the RPS. Since it does not reflect line losses, it has historically required adjusting by an average of 5% to accurately reflect retail sales.

Working within these data constraints, Staff calculates the trailing twelve-month estimate of the solar portion of retail electricity sold by dividing the estimated amount of solar electricity produced over the previous twelve months by the estimated amount of retail electricity sold over the same period.


Applying the monthly output factors in Appendix A to the cumulative installed capacity reported by the SREC Registration Processing team on December 18, 2019 results in an estimation of solar electricity produced through the previous twelve months.

On December 6, 2019 GATS reported the unadjusted load served by New Jersey TPS/BGS providers to Staff as approximately 74.5 million MWh for the twelve months ending on November 30, 2019. The unadjusted load served must be reduced by a factor accounting for line losses to reflect retail sales by the RPS obligated entities; in Staff’s experience with these figures in the annual RPS compliance process, this adjustment has averaged 5%.

Using these inputs, Staff’s calculation produces an estimate that, at present, 4.87% of the retail electricity sold in New Jersey is generated by solar facilities connected to New Jersey distribution systems.

STAFF RECOMMENDATION

The above-referenced rule adoption requires the Board to seek a stakeholder input to refine the assumptions used in calculating attainment of the 5.1% Milestone. Staff recommends that the Board direct Staff to gather final stakeholder input into the variables used in calculating the percent of retail electricity sales comprised from solar electricity, the monthly solar production factors to apply to cumulative installed capacity to arrive at estimated solar electricity generation as well as line loss adjustment factors to apply to Board-jurisdictional load served to arrive at retail electric sales. Staff proposes that the Board provide notice to stakeholders seeking that this stakeholder input must be provided by January 17, 2020. Based upon these refined inputs, Staff anticipates providing the Board an updated forecast for 5.1% milestone attainment by January 31, 2020.

DISCUSSION AND FINDINGS

The Board FINDS that amendments to the RPS rules have been properly proposed and adopted to close the SREC registration program upon attainment of the 5.1% Milestone. The Board FINDS that Staff should seek additional stakeholder input on the variables used to calculate the 5.1% Milestone, including the solar capacity factor and the line loss adjustment factor, as directed in the rule. The Board HEREBY NOTICES SREC Market Stakeholders to provide input on the variables referenced through submission to the Board’s SECRETARY’S OFFICE by close of business on January 17, 2020. The Board DIRECTS Staff to post this Order to the New Jersey Clean Energy Program website and to distribute the Order to the relevant stakeholder email distribution lists. Staff has proposed a public process for obtaining it. The Board DIRECTS Staff to report its findings on refined estimates of solar productivity and retail electricity sales to the Board on or before January 31, 2020, and periodically thereafter until the attainment of the 5.1% Milestone.
This Order shall be effective on January 8, 2020.

DATED: 1/8/20

JOSEPH L. FIORDALISO
PRESIDENT

MARY-ANNA HOLDEN
COMMISSIONER

DIANNE SOLOMON
COMMISSIONER

UPIENDRA J. CHIVUKULA
COMMISSIONER

ROBERT M. GORDON
COMMISSIONER

AIDA CAMACHO-WELCH
SECRETARY

I HEREBY CERTIFY that the within document is a true copy of the original in the files of the Board of Public Utilities.
IN THE MATTER OF THE CLOSURE OF THE SREC REGISTRATION PROGRAM
PURSUANT TO P.L. 2018, c. 17.

BPU DOCKET NO. QO19010068

SERVICE LIST

BPU

New Jersey Board of Public Utilities
44 South Clinton Ave. 9th Floor
Trenton, NJ 08625-0350

Paul Flanagan, Executive Director
Paul.flanagan@bpu.nj.gov

Aida Camacho-Welch, Secretary
board.secretary@bpu.nj.gov

Stacy Peterson
stacy.peterson@bpu.nj.gov

Sara Bluhm
Sara.bluhm@bpu.nj.gov

Ilene M. Lampitt, Esq.
ilene.lampitt@bpu.nj.gov

Dr. Benjamin Witherell
benjamin.witherell@bpu.nj.gov

DOL

Division of Law, Public Utilities Section
R.J. Hughes Justice Complex, 7th Floor West
25 Market Street, P.O. Box 112

Pamela Owen
pamela.owen@law.njoag.gov

Daren Eppley
daren.eppley@law.njoag.gov

Michael Beck
michael.beck@law.njoag.gov

BPU's BGS CONSULTANTS

Frank Mossburg, Managing Director
Bates White, LLC
2001 K Street, NW
North Building, Suite 500
Washington DC, 20006
frank.mossburg@bateswhite.com

DIVISION OF RATE COUNSEL

140 East Front Street, 4th Floor
Trenton, New Jersey 08625

Stefanie A. Brand, Esq., Director
sbrand@rpa.nj.gov

Celeste Clark
cclark@rpa.nj.gov

James Glassen
jglassen@rpa.nj.gov

Debra Layugan
dlayugan@rpa.nj.gov

Brian Lipman
blipman@rpa.nj.gov

Ami Morita
amorita@rpa.nj.gov

Diane Schulze
schulze@rpa.nj.gov

Lisa Gurkas
lgurkas@rpa.nj.gov

Max Chang
Synapse Energy Economics, Inc.
485 Massachusetts Ave., Suite 2
Cambridge, MA 02139
mchang@synpase-energy.com
PSE&G
Terrance J. Moran
PSE&G
80 Park Plaza, T-13
Newark, NJ 07102-4194
Terrance.moran@pseg.com

Joseph A. Shea, Esq.
PSE&G
80 Park Plaza, T-5
Newark, NJ 07102-4194
Joseph.shea@pseg.com

ATLANTIC CITY ELECTRIC CO.
500 N. Wakefield Drive
Pepco Holdings, LLC – 92DC56
PO Box 6066
Newark, DE 19714-6066

Susan DeVito
Susan.devito@pepcoholdings.com

Joseph F. Janocha
joseph.janocha@pepcoholdings.com

Atlantic City Electric Company – 92DC42
500 N. Wakefield Drive
PO Box 6066
Newark, DE 19714-6066

Philip J. Passanante, Esq.
philip.passanante@pepcoholdings.com

Alison L. Regan
alison.regan@pepcoholdings.com

Thomas M. Hahn
Pepco Holdings, LLC-63ML38
5100 Harding Highway
Mays Landing, NJ 08330
Thomas.hahn@pepcoholdings.com

Daniel A. Tudor
Pepco Holdings, Inc.
701 Ninth Street NW
Washington, DC 20001
datudor@pepco.com

JCP&L
Jersey Central Power & Light Co.
300 Madison Avenue
Morristown, NJ 07962-1911

Sally J Cheong
scheong@firstenergycorp.com

Jennifer Spricigo
jspricigo@firstenergycorp.com

ROCKLAND
John L. Carley, Esq.
Consolidated Edison Co. of NY
Law Dept., Room 1815-S
4 Irving Place
New York, NY 10003
carlevi@coned.com

James C. Meyer, Esq.
Riker, Danzig, Scherer, Hyland & Perretti
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962
jmeyer@riker.com

William A. Atzl, Jr.
Rockland Electric Company
4 Irving Place – Room 515-S
New York, NY 10003
atzlw@coned.com

Margaret Comes, Esq.,
Consolidated Edison Co. of NY
Law Department, Room 1815-S
4 Irving Place
New York, NY 10003
comesm@coned.com
Agenda Date: 01/08/2020
Agenda Item: 8C

NERA

Paul Cardona
NERA Economic Consulting
777 S. Figueroa, Suite 1950
Los Angeles, CA 90017
Paul.Cardona@NERA.com

Chantale LaCasse
NERA Economic Consulting
1166 Avenue of the Americas
New York, NY 10036
chantale.lacasse@nera.com

Eugene Meehan
NERA Economic Consulting
1255 23rd Street
Washington, DC 20037
Eugene.meehan@nera.com

NJLEUC

Paul F. Forshay, Partner
Eversheds-Sutherland, LLP
700 Sixth Street, NW, Suite 700
Washington, D.C. 20001-3980
paul.forshay@eversheds-sutherland.com

Steven S. Goldenberg, NJLEUC, Esq.
Fox Rothschild LLP
Princeton Corporate Center
997 Lenox Drive, BLDG. 3
Lawrenceville, NJ 08648-2311
SGoldenberg@foxrothschild.com

Third Party Suppliers

Murray E. Bevan, Esq.
Bevan, Mosca, Giuditta & Zarillo, P.C.
222 Mount Airy Road, Suite 200
Basking Ridge, NJ 07920
mbevan@bmgzlaw.com

Dana Swieson
EPEX
717 Constitutional Drive
Suite 110
Exton, PA 19341
dana.swieson@epex.com

Marc A. Hanks
Senior Manager, Government & Regulatory Affairs
Direct Energy Services, LLC
Marc.Hanks@directenergy.com

Stacey Rantala
National Energy Marketers Association
3333 K Street, N.W., Suite 110
Washington, D.C. 20007
srantala@energymarketers.com

David B. Applebaum
Director, Regulatory Affairs
NextEra Energy Resources, LLC
21 Pardee Place
Ewing, New Jersey 08628
david.applebaum@nexteraenergy.com

David Gil
Manager, Regulatory Affairs
NextEra Energy Resources, LLC
700 Universe Boulevard
Juno Beach, Florida 33408
david.gil@nexteraenergy.com

Kathleen Maher
Constellation NewEnergy
810 Seventh Avenue, Suite 400
New York, NY 10019-5818
kathleen.maher@constellation.com

BGS SUPPLIERS

Steven Gabel - IEPNJ
Gabel Associates
417 Denison Street
Highland Park, NJ 08904
steven@gabelassociates.com

James Laskey, Esq. - IEPNJ
Norris McLaughlin & Marcus
721 Route 202-206
Bridgewater, NJ 08807
jlaskey@nmmlaw.com
<table>
<thead>
<tr>
<th>Name</th>
<th>Company / Position</th>
<th>Address Details</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raymond Depillo</td>
<td>PSEG Services Corp</td>
<td>80 Park Plaza, T-19, Newark, NJ 07101</td>
<td><a href="mailto:raymond.depillo@pseg.com">raymond.depillo@pseg.com</a></td>
</tr>
<tr>
<td>Shawn P. Leyden, Esq.</td>
<td>PSEG Energy Res &amp; Trade</td>
<td>80 Park Plaza, T-19, Newark, NJ 07101</td>
<td><a href="mailto:shawn.leyden@pseg.com">shawn.leyden@pseg.com</a></td>
</tr>
<tr>
<td>Mark Haskell</td>
<td>Cadwalader, LLP</td>
<td>700 Sixth Street, SW, Washington, DC 20001</td>
<td><a href="mailto:mark.haskell@cwt.com">mark.haskell@cwt.com</a></td>
</tr>
<tr>
<td>David K Richter, Esq.</td>
<td>PSEG Regulatory</td>
<td>80 Park Plaza, T-5C, Newark, NJ 07101</td>
<td><a href="mailto:david.richter@pseg.com">david.richter@pseg.com</a></td>
</tr>
<tr>
<td>Craig S. Blume</td>
<td>Director, Power Marketing</td>
<td>UGI Energy Services / UGI Development Company</td>
<td><a href="mailto:cblume@ugies.com">cblume@ugies.com</a></td>
</tr>
<tr>
<td>Marcia Hissong, Directr</td>
<td>Contract Admin/Council</td>
<td>DTE Energy Trading, Inc.</td>
<td><a href="mailto:hissongmr@dteenergy.com">hissongmr@dteenergy.com</a></td>
</tr>
<tr>
<td>Don Hubschman</td>
<td>American Electric</td>
<td>155 W. Nationwide Blvd, Columbus, OH 43215</td>
<td><a href="mailto:dhubschman@aepes.com">dhubschman@aepes.com</a></td>
</tr>
<tr>
<td>Christine McGarvey</td>
<td>AEP Energy Partners</td>
<td>155 W Nationwide Blvd, Suite 500, Columbus, OH 43215</td>
<td><a href="mailto:clmcgarvey@aepes.com">clmcgarvey@aepes.com</a></td>
</tr>
<tr>
<td>Matthew Davies</td>
<td>TransCanada</td>
<td>110 Turnpike Road, Suite 300, Westborough, MA 01581</td>
<td><a href="mailto:Matthew_daview@transcanada.com">Matthew_daview@transcanada.com</a></td>
</tr>
<tr>
<td>Glenn Riepl</td>
<td>AEP Energy Services</td>
<td>1 Riverside Plaza, 14th Floor, Columbus, OH 43215-2373</td>
<td><a href="mailto:gfraspl@aep.com">gfraspl@aep.com</a></td>
</tr>
<tr>
<td>Howard O. Thompson - BGS</td>
<td>Russo Tumulty</td>
<td>Kelly, LLP 240 Cedar Knolls Road, Suite 306, Cedar Knolls, NJ 07927</td>
<td><a href="mailto:hthompson@russotumulty.com">hthompson@russotumulty.com</a></td>
</tr>
<tr>
<td>Sharon Weber</td>
<td>PPL Energy Plus</td>
<td>2 North 9th Street TW 20, Allentown, PA 18101</td>
<td><a href="mailto:sjweber@pplweb.com">sjweber@pplweb.com</a></td>
</tr>
<tr>
<td>Glen Thomas</td>
<td>The P3 Group, GT Power Group LLC</td>
<td>1060 First Avenue, Suite 400, King of Prussia, PA 19406</td>
<td><a href="mailto:gthomas@gtpowergroup.com">gthomas@gtpowergroup.com</a></td>
</tr>
<tr>
<td>Divesh Gupta, Esq.</td>
<td>Exelon Business</td>
<td>Services Corp. 111 Market Place, Suite 1200C, Baltimore, Maryland 21202</td>
<td><a href="mailto:divesh.gupta@constellation.com">divesh.gupta@constellation.com</a></td>
</tr>
<tr>
<td>Tom Hoatson</td>
<td>LS Power Development, LLC</td>
<td>2 Tower Center, East Brunswick, NJ 08816</td>
<td><a href="mailto:thoatson@lspower.com">thoatson@lspower.com</a></td>
</tr>
</tbody>
</table>
Adam Kaufman  
Executive Director  
Independent Energy Producers of NJ  
Five Vaughn Drive, Suite 101  
Princeton, NJ 08540  
akaufman@kzgrp.com

Anthony Pietranico  
ConEdison Solutions Inc.  
Electricity Supply Specialist  
Tel: 732-741-5822 x204  
pietranicoa@coned solutions.com

Aundrea Williams  
Director Regulatory Affairs  
NextEra Power Marketing LLC  
700 Universe Boulevard  
Juno Beach, Fl. 33408  
aundrea.williams@next eraenergyservices.com

Ira G. Megdal  
Cozen O’Connor  
457 Haddonfield Road  
Suite 300 P.O. Box 5459  
Cherry Hill, NJ 08002  
imegdal@cozen.com

Christi L. Nicolay  
Division Director  
Macquarie Energy LLC  
500 Dallas St., Level 31  
Houston, TX 77002  
Chris ti.Nicolay@macquarie.com

Becky Merola  
Noble Americas Energy Solutions, LLC  
5325 Sheffield Avenue  
Powell, OH 43065  
bmerola@noblesolutions.com

OTHER PARTIES

Chrissy Buteas  
NJBIA  
102 West State Street  
Trenton, NJ 08606-1199  
cbuteas@njbia.org

John Holub  
NJ Retail Merchants Assoc.  
332 West State Street  
Trenton, NJ 08618  
John@nirma.org

Holly Minogue  
Gabel Associates  
Energy, Environmental, and Public Utility Consulting  
417 Denison Street  
Highland Park, NJ 08904  
holly.minogue@gabelassociates.com

Larry Spielvogel, PE  
L. G. Spielvogel, Inc.  
190 Presidential Blvd # 310  
Bala Cynwyd, PA 19004-1151  
spielvogel@comcast.net

Robert Macksoud, Jr, CEP  
Director Energy Procurement  
EnergySolve  
One Executive Drive, Suite 401  
Somerset, NJ 08873  
r macksoud@energysolve.com

Lyle Rawlings  
Mid-Atlantic Solar Energy Industries Association  
Rutgers EcoComplex, Suite 208-B  
1200 Florence-Columbus Road, Bordentown, NJ 08505  
lrawlings@msei a.net

Bruce H. Burcat, Esq.  
Executive Director  
Mid-Atlantic Renewable Energy Coalition  
208 Stonegate Way  
Camden, DE 19934  
b burcat@marec.us

Sean Gallagher  
Solar Energy Industries Association  
575 7th Street, NW  
Suite 400  
Washington, DC 20005  
s gallagher@seia.org
## APPENDIX A

<table>
<thead>
<tr>
<th>Month</th>
<th>Expected Solar Output (MWh/MW)</th>
<th>Installed Capacity at Month Start (MWdc)</th>
<th>Production *(MWh)</th>
<th>Solar MWh Produced as a Percent of Retail Sales (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 2019</td>
<td>120</td>
<td>2,882</td>
<td>345,877</td>
<td>4.52%</td>
</tr>
<tr>
<td>July 2019</td>
<td>125</td>
<td>2,943</td>
<td>367,877</td>
<td>4.58%</td>
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<tr>
<td>Aug. 2019</td>
<td>116</td>
<td>2,980</td>
<td>345,700</td>
<td>4.65%</td>
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<tr>
<td>Sept. 2019</td>
<td>102</td>
<td>3,006</td>
<td>306,584</td>
<td>4.70%</td>
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<tr>
<td>Oct. 2019</td>
<td>85</td>
<td>3,058</td>
<td>259,966</td>
<td>4.75%</td>
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<tr>
<td>Nov. 2019</td>
<td>68</td>
<td>3,087</td>
<td>209,932</td>
<td>4.79%</td>
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<tr>
<td>Dec. 2019</td>
<td>59</td>
<td>3,122</td>
<td>184,212</td>
<td>4.83%</td>
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<td>Jan. 2020</td>
<td>73</td>
<td>3,157</td>
<td>230,478</td>
<td>4.87%</td>
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<tr>
<td>Feb. 2020</td>
<td>86</td>
<td>3,192</td>
<td>274,532</td>
<td>4.92%</td>
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<tr>
<td>Mar. 2020</td>
<td>103</td>
<td>3,227</td>
<td>332,405</td>
<td>4.98%</td>
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<tr>
<td>Apr. 2020</td>
<td>115</td>
<td>3,262</td>
<td>375,157</td>
<td>5.05%</td>
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<tr>
<td>May 2020</td>
<td>120</td>
<td>3,297</td>
<td>395,668</td>
<td>5.124%</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>1172</strong></td>
<td><strong>-</strong></td>
<td><strong>3,628,387</strong></td>
<td><strong>-</strong></td>
</tr>
</tbody>
</table>