



March 31, 2016

Luly E. Massaro  
Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**In Re: Investigation into the Changing Distribution System and Modernization of Rates in Light of the Changing Distribution System (Docket No. 4600)**

Dear Ms. Massaro,

In response to the *Notice of Commencement of Docket and Invitation for Stakeholder Participation* issued on March 18, 2016, SolarCity Corporation (“SolarCity”) respectfully requests permission to participate in the above-captioned proceeding.

SolarCity is the nation’s leading full service solar power provider for homeowners and businesses, a single source for engineering, design, installation, monitoring, and support. At present, the company has approximately 15,000 employees nationwide and has installed solar energy systems for over 230,000 customers nationwide as of December 31, 2015. In addition to rooftop solar, SolarCity develops and deploys other non-solar distributed energy resources (DERs) for both residential and commercial applications. Specifically, SolarCity offers smart thermostats and battery energy storage systems to help customers manage their energy use. SolarCity entered Rhode Island in June of 2015, has a substantial presence in neighboring states and is closely following policy developments in the region.

SolarCity is well positioned to contribute to and participate in the Docket No. 4600 stakeholder committee. As a provider of DERs and particularly solar and storage products and services, for domestic or commercial use, SolarCity has a direct interest in the evolution of regulatory approaches to a more technologically integrated distribution system and toward a smarter rate design that supports both customer investments in DERs and innovative utility grid planning. SolarCity views the design and operation of the electric grid as a major opportunity to partner across the energy industry, with the aim of driving innovation to benefit consumers and our environment. SolarCity has unique expertise and technical capacity in addressing the issues before the committee and anticipates having the opportunity to be a critical contributor to technical aspects of this proceeding.

SolarCity will be represented by the Policy & Electricity Markets team, with support from our Grid Engineering Solutions team members, the majority of whom are former utility engineers, economists, and technologists. SolarCity’s Grid Engineering Solutions team is leading efforts to collaboratively solve challenges and foster dialogue that will make the 21st century's distributed

grid a reality. Our latest report, “A Pathway to the Distributed Grid”, describes in detail how embracing DERs offers a better alternative to today’s centralized grid design. It evaluates the economics of DERs and outlines a pathway to capturing their potential value which is very much aligned with the overarching question of this docket. We believe that it makes abundant economic sense for utilities to take advantage of DERs’ full capabilities. But to unlock this potential, it’s crucial that regulators provide utilities the right incentives to employ economically rational approaches to grid planning. Our goal is to help provide concrete evidence and recommendations needed by regulators, legislatures, utilities, DER providers, and industry stakeholders to transition to a cleaner, more affordable and resilient grid of the future.

As a national and regional leader in rooftop solar development, on both the residential and commercial scale, SolarCity is keenly aware of the need for policy to be informed by real-world experiences of approaches that are proven to effectively support customer decisions to invest in onsite solar generation and energy storage. Accordingly, no other party or representative can adequately represent SolarCity’s interest or bring SolarCity’s unique perspective and expertise to the table.

We affirm that we are duly authorized to participate on behalf of SolarCity and that SolarCity is committed to fully and actively participating in this stakeholder process. We, along with our team at SolarCity, will participate in good faith to work collaboratively with other stakeholders to develop recommendations on the issues under consideration in this docket.

Respectfully submitted, on this the 31<sup>st</sup> of March, 2016,

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/s/  
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