

November 16, 2017

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

RE: Docket No. 4743 – Petition of Tesla, Inc. and Sunrun, Inc. for Declaratory Judgment or an Advisory Ruling on RI Gen. Laws § 39-26.4, the Net Metering Act

Dear Ms. Massaro:

The Northeast Clean Energy Council (NECEC) writes to express its support for the Petition by Tesla, Inc., and Sunrun, Inc., for Declaratory Judgment or an Advisory Ruling relative to the eligibility of certain solar power generation systems paired with battery storage to net meter, pursuant to RI Gen. Laws § 39-26.4, wherein: (1) the solar power generating system is no greater than 25 kilowatts (kW) alternating current (AC); (2) the battery storage charges only from the solar power generation system; and (3) where the customer-host does not take electric supply service under a time-varying or time-of-use (TOU) rate (“Rhode Island Small Scale Solar+Storage”).

NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. We are the only organization in the Northeast that covers all the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies. Many of our members are already doing business in Rhode Island, and many more are interested in doing so in the near future.

NECEC believes that the affirmation of net energy metering (NEM) eligibility for Solar + Storage configurations is critical to unlocking the potential for such paired systems to provide a host of benefits to customers in Rhode Island and across our footprint in the northeast. For this reason, we have supported similar petitions filed in neighboring jurisdictions, including Tesla’s request to the Massachusetts Department of Public Utilities (DPU) in docket 17-105,¹ and we intend to remain active participants in any future inquiries addressing broader net metering eligibility for different system configurations, use-cases, sizes, and rate structures. In both the narrow criteria presented here and beyond, energy storage promises great value to Rhode Island through a combination of substantial energy and monetary savings, high-priority energy and environmental policy impacts, and vitally important grid management and resiliency benefits.²

¹ See NECEC Initial Comments to the DPU in 17-105 at:

http://170.63.40.34/DPU/FileRoomAPI/api/Attachments/Get/?path=17-105%2fNECEC_Initial_Comments_62317.pdf.

² NECEC’s December 16, 2016 comments to the Massachusetts Department of Energy Resources (DOER) further elaborate on the “catalytic” role energy storage can play in achieving massive savings and driving achievement of several public policy priorities of paramount importance:

NECEC therefore offers its strong support for the advancement of Solar+Storage pairings and urges the Commission to rule favorably on the Petitioners' request to help reduce barriers to beneficial Solar+Storage deployment in Rhode Island.

As the Commission looks beyond the Petitioners' discrete request, NECEC notes its position in favor of broadened determination of NEM eligibility for additional pairings of solar and storage (and other net metering eligible technologies). To this end, our support for this petition should not be interpreted to mean that projects falling outside of the Rhode Island Small Scale Solar+Storage parameters are ineligible for NEM. NECEC and its members echo the Parties' and Office of Energy Resources' (OER) support for the PUC initiating a wider proceeding to address other configurations of storage paired with net metering technologies and associated charging and export arrangements. We would support, and will commit to participating in, a stakeholder process to lend certainty regarding NEM eligibility for configurations and pairings in addition to those that are the subject of the Petition here.

Thank you for your consideration of these comments. Please let us know if we can be of any further assistance to the Department in the future.

Sincerely,



Peter Rothstein
President



Janet Gail Besser
Executive Vice President

cc: Jamie Dickerson, NECEC Policy Analyst

<http://www.necec.org/files/necec/Policy%20Documents/NECEC%20Storage%20Target%20Comments%20to%20DOER%20-%202012.16.2016.pdf>