



December 11, 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) submits this letter in support of the Motion to Reopen filed by the Petitioner, Tesla, Inc., on November 30, 2017, in Docket No. 4743. NECEC believes that the petition modifications adopted by the Public Utilities Commission (PUC) on November 28, 2017, must be addressed further and remedied, and we recommend that the PUC to approve the Motion and revisit the issues considered in the adoption of the modifications.

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 greatly appreciates the Commission’s granting of the petition on November 28, 2017. We are concerned, however, by the imposition of an additional export/discharge limitation as a fourth condition for net metering eligibility in the scope of the Petition before the Commission. In the medium and long-term, a limitation on discharging for energy storage systems paired with net metering facilities threatens to severely hamper Rhode Island’s ability to take advantage of the many benefits storage has to offer. In the near-term, it is premature to include any discharge limitations before robust stakeholder input is solicited as part of the future broadened inquiry into more diverse net metering+storage configurations. With discharge limitations not included in the initial petition, stakeholders such as NECEC likely considered the topic of exports/discharge to be outside the scope of the inquiry. As a result, the broader community of interested stakeholders was not afforded appropriate opportunity to weigh in on this subject, both as pertains to the narrow Petition before the Commission and with regard to broader ramifications for the future of energy storage in Rhode Island.

In light of the discharge modification adopted, we believe that Tesla should at least be given the opportunity to further explain its views on the importance of the ability to discharge. We concur with Tesla that a limit on discharge at this stage will at best be unnecessary and, at worst, an

impediment to Rhode Island's further advancing its well-known leadership in energy efficiency.¹ Especially since no party has requested a formal constraint on discharges for the project configurations described in the Petition, there is due cause to allow the Petitioner to further elaborate on and clarify its position. So, we request that the Commission grant the aforementioned Motion to Reopen, allow for further explanation, and revisit the discharging condition prior to the issuance of a written order.

Thank you for your consideration of this letter of support. Please let us know if the Commission has any questions or if we can be of any further assistance in the future.

Sincerely,



Peter Rothstein
President



Janet Gail Besser
Executive Vice President

cc: Jamie Dickerson, NECEC

¹ Rhode Island has consistently landed in one of the top five positions on the American Council for an Energy-Efficient Economy's ("ACEEE") scorecard in recent years. See <http://aceee.org/state-policy/scorecard>.