



November 7, 2017

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

Dear Ms. Massaro:

I am writing in support of the Petition by Tesla Inc., and Sunrun, Inc. ("the Parties") for Declaratory Judgment, or in the alternative, an Advisory Ruling, with respect to the eligibility for net metering of certain solar power generation systems paired with battery storage, pursuant to R.I. Gen. Laws §39-26.4 et seq., where: 1) the solar power generating system is no greater than 25kW 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 of time-of-use (TOU) rate (Rhode Island Small Scale Solar+Storage).

As the state's lead energy policy agency, the Rhode Island Office of Energy Resources (OER) works to advance a reliable, affordable, and clean energy system as our core mission. Advances in battery technology and falling prices are increasingly making energy storage a viable solution in the market. The use of energy storage has great potential to bring substantial and diverse benefits to customers, the electric system, and society. These benefits include, but are not limited to, increasing system efficiency, reducing energy and system costs, reducing customer bills, integrating clean energy into the system, and increasing resiliency of the grid. Therefore, OER supports efforts to reduce barriers to storage deployment in Rhode Island and advance prudent policy measures to promote this technology in a thoughtful, cost-effective manner.

OER supports the Petition of the Parties, which will allow paired solar-storage projects that meet certain eligibility criteria to participate in net metering. OER believes that the request to allow such projects to participate in net metering, within the limited proposed scope, is an appropriate and reasonable request at this time. Allowing such a request will enable customers to enjoy the benefits of storage combined with renewable energy, consistent with the State's policy objectives.

Given the significant potential for storage to play a role in the state's energy strategy going forward, OER further supports the Parties' suggestion that the Commission initiate a separate, broader proceeding to address net-metering eligibility and treatment of systems under different system configurations, use-cases, sizes and rate structures, including time-varying rates.

Thank you for your time and consideration of this letter of support.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Grant", with a long horizontal line extending to the right.

Carol Grant  
Commissioner  
Rhode Island Office of Energy Resources