

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

PETITION OF TESLA, INC. & SUNRUN INC.

FOR DECLARATORY JUDGMENT

Docket No. 4743

PURSUANT TO R. GEN. LAWS §39-26.4 et seq.,

THE NET METERING ACT

**SUNRUN INC. COMMENTS
IN SUPPORT OF TESLA'S MOTION TO REOPEN**

December 5, 2017

In an Open Meeting held November 28, 2017 in the above-captioned docket, the Commission voted to grant the Tesla, Inc. (“Tesla”) and Sunrun Inc. (“Sunrun”) Petition for Declaratory Judgment or an Advisory Ruling (“Petition”), as modified by the Commission in the Meeting. On November 30, 2017, pursuant to Rule 1.26(a)(1) of the Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Tesla moved to reopen the above-captioned proceeding in order to seek clarification regarding said modification. Sunrun respectfully submits these comments in support of Tesla’s Motion to Reopen (“Motion”).

Sunrun would first like to thank the Commission for granting the Petition as well as its consideration of Tesla’s Motion. We also echo Tesla’s thanks to the Division of Public Utilities and Carriers (the “Division”), the Office of Energy Resources, the Narragansett Electric Co. d/b/a National Grid (“National Grid”), and the Northeast Clean Energy Council (“NECEC”), for their thoughtful contributions to this proceeding.

Sunrun would like to take this opportunity to explain its position regarding storage discharge for the Commission's consideration. As we mentioned in our reply comments, prohibiting net energy metering ("NEM") systems equipped with energy storage from exporting otherwise NEM-eligible electricity to the grid would sacrifice a significant portion of the benefits that energy storage can deliver, reducing both the temporal range of responsiveness, and the magnitude of that response. We respectfully urge the Commission that such a result would be shortsighted and contrary to numerous state and regional initiatives seeking to unlock the full value of customer-sited energy storage, and we discussed in our reply comments a number of instances where the value of energy storage as a vehicle for "smart exports" has been acknowledged and supported by regulators and policymakers.

Additionally, given that there is no economic time-varying rate for residential customers, an express prohibition on storage discharge would be unnecessary. As the Division noted on page 5 of its Comments, "[i]t is possible that competitive suppliers may, now or in the future, offer TOU-based rates for competitive power supply, which could provide an incentive to...allow the net metered host to charge at lower rates and discharge at higher rates." However, all parties are already agreeing that these systems will not take service under TOU rates, thus making an export prohibition unnecessary.

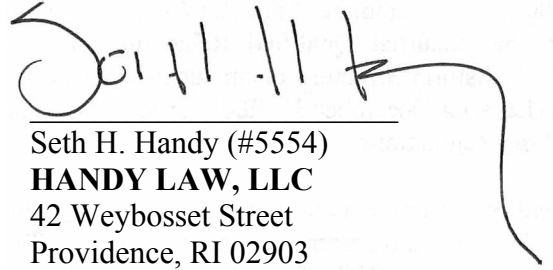
No party requested any formal constraints on discharges. National Grid's Initial Comments stated: "For the most part, National Grid's Policy and Technical Concerns are mitigated where the Solar+Storage facility is 25 kW (AC) or less, the battery charges only from the solar facility, and *either* the battery does not export to National Grid's EPS *or* the battery exports to the EPS subject to specific limitations on rate classification for

such exports in essence the Rhode Island Small Scale Solar+Storage facilities that are the subject of Tesla and Sunrun’s Petition.” (p. 2, emphasis added). National Grid’s Reply Comments agreed with the Division that National Grid should have the right to inspect the Rhode Island Small Scale Solar+Storage facilities “to ensure that the battery is charged only from the solar facility, and the violations of the net metering eligibility requirements would result in the customer’s loss of net metering status.” (pp. 1 – 2) Neither National Grid nor the Division sought any discharge prohibition. In its Initial Comments, National Grid indicated that a “criteri[on] imposed on eligibility (such as . . . energy exports)” was one of the “Policy and Technical Concerns” that “[f]or the most part . . . are mitigated” where a paired facility is a Rhode Island Small Scale Solar+Storage facility, as set forth in the Tesla and Sunrun petition. (p. 2) Therefore, Sunrun supports Tesla’s request that the Commission not impose a requirement that Rhode Island Small Scale Solar+Storage facilities limit exports in order to be found eligible for NEM.

Similar to Tesla, Sunrun would welcome the opportunity to further address NEM eligibility and treatment of systems under different system configurations, use-cases, sizes and rate structures, including time-varying rates; and the various implementation issues that have been and may be later identified in the forthcoming separate, broader inquiry that the Commission also voted to order. We repeat our thanks to the Commission for its consideration of these comments.

SUNRUN, INC.

By their Attorneys,

A handwritten signature in black ink, appearing to read 'Seth H. Handy', is written over a horizontal line. A long, curved arrow-like stroke extends from the right side of the signature.

Seth H. Handy (#5554)

HANDY LAW, LLC

42 Weybosset Street

Providence, RI 02903

(401) 626-4839

(401) 753-6306 Fax

seth@handylawllc.com

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