

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

**PETITION OF TESLA, INC. & SUNRUN, INC.
FOR DECLARATORY JUDGMENT
PURSUANT TO R.I. GEN. LAWS §39-26.4 et seq.,
THE NET METERING ACT**

Docket No. 4743

**RESPONSE OF TESLA, INC. TO FIRST SET OF DATA REQUESTS
DIRECTED TO TESLA, INC. AND SUNRUN INC.
BY THE STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
(October 6, 2017)**

- 1-1. Please provide diagrams to show the configuration and technical specifications of the system for which the Petition seeks to be ruled eligible for net metering.**

1-1. RESPONSE: Tesla's Powerwall Owner Manual is available at the following web link:

https://www.tesla.com/sites/default/files/pdfs/powerwall/powerwall_2_ac_owners_manual.pdf Tesla's Powerwall Technical Specifications are available at the following web link. Please refer to the "Technical Specs" section at the bottom of the page. <https://www.tesla.com/powerwall>

- 1-2. Please explain whether there will be any ongoing compliance to ensure that the installations remain configured to only charge from solar and not from the distribution grid. If not, please explain why ongoing inspections would not be necessary.**

1-2. RESPONSE: There is no need for ongoing compliance. NGRID already accounts for the full capacity of both the storage unit and the PV system in its interconnection process. Please also see response to Division data request 1-4

- 1-3. Please explain how the size of the solar system with storage would be sized in compliance with R.I. Gen. Laws §39-26.4-2(5).**

1-3. RESPONSE: Tesla does not intend to change the way it sizes its customers' solar net metering systems. Consistent with National Grid's position, it is Tesla's position that with respect to Net Metering eligibility, the solar+storage system capacity is equal the inverter nameplate or capacity rating of the solar PV unit (i.e the Solar Net Metered Resource) that is associated with, up to 25 kW. Adding a battery a solar PV system does not alter the size of that system. Please also see response to DPUC data request 1-5

Prepared by or under the supervision of
Mike McCarty

CERTIFICATE OF SERVICE

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being delivered by first class mail to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.


Seth H. Handy, Counsel for Tesla, Inc.

Tesla, Inc. & Sunrun, Inc – Petition for Declaratory Judgment – Docket No. 4743

Service List updated 10/7/17

Name/Address	E-mail	Phone
Seth H. Handy, Esq. HANDY LAW, LLC 42 Weybosset St. Providence, RI 02903	seth@handylawllc.com ;	401-626-4839
	becca.polisuk@sunrun.com ;	
	chris.rauscher@sunrun.com ;	
Kevin Auerbacher, Esq. Tesla, Inc. 1050 K Street, NW, Suite 101 Washington, DC 20001	Kauerbacher@tesla.com ;	202-657-3155
Bicky Corman, Esq. EKM Law, PLLC 1616 H Street, NW, Suite 300 Washington, DC 20006	bcorman@ekmlawfirm.com ;	202-213-1672
Jon Hagopian, Esq. Division of Public Utilities & Carriers	Jon.hagopian@dpuc.ri.gov ;	401-784-4775
	Steve.scialabba@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
Richard Hahn Daymark Energy Advisors One Washington Mall, 9 th floor Boston, MA 02108	rhahn@daymarkea.com ;	617-778-2467
Original & 9 copies file w/ Luly E. Massaro, Commission Clerk	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	

Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Todd.bianco@puc.ri.gov;	
	Alan.nault@puc.ri.gov;	
Raquel Webster, Esq. National Grid	Raquel.webster@nationalgrid.com;	781-907-2121
	Joanne.scanlon@nationalgrid.com;	
	Celia.obrien@nationalgrid.com;	
Christopher Kearns Andrew Marcaccio, Esq. Office of Energy Resources	Christopher.Kearns@energy.ri.gov;	
	Andrew.Marcaccio@doa.ri.gov;	
	Danny.Musher@energy.ri.gov;	
	Nicholas.ucci@energy.ri.gov;	