

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

IN RE: RENEWABLE ENERGY GROWTH)
PROGRAM FOR YEAR 2018 RI DISTRIBUTED)
GENERATION BOARD AND NATIONAL GRID)

Docket No. 4774

**MOTION TO INTERVENE AND REQUEST FOR EXTENSION TO FILE
COMMENTS BY SUNRUN INC.**

By its attorneys, Sunrun, Inc. (“Sunrun”) moves to intervene in the above captioned proceeding pursuant to Rule 1.13(a) and (b) of the Rhode Island Public Utilities Commission (PUC) Rules of Practice and Procedure (Rules). Sunrun also respectfully requests an extension to file comments in this proceeding. In support of this motion and request Sunrun states:

1. Sunrun is a leader in residential solar, storage, and energy management with over 160,000 customers in 22 states and the District of Columbia. We pioneered the “solar-as-a-service” model more than ten years ago and today are the largest dedicated residential solar, storage, and energy services company in the United States. Sunrun is committed to ensuring that all utility customers have a viable choice in how they procure and consume electricity.
2. Sunrun has an ownership or other interest in renewable energy generation projects.
3. Sunrun is an active participant in other dockets before the PUC, including the Power Sector Transformation Initiative.
4. Rule 1.13 states any person claiming an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the PUC.

5. Further, Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

6. It is necessary and appropriate to grant Sunrun the right to intervene in this proceeding.

7. The filings of the Renewable Energy Growth Program for 2018 potentially threaten or may impede the planned renewable energy projects in which Sunrun has an interest.

8. Sunrun will advocate positions consistent with its goals of ensuring that rooftop solar and energy storage are deployed efficiently and economically and that utility rate design is fair, clear, and transparent so as not to discriminate against any particular class of customers or customers who install rooftop solar or storage. Sunrun has unrepresented interests in this proceeding that will not be represented by any other intervenor.

9. Sunrun became aware of the Procedural Schedule on December 14, 2017 upon its posting to Docket No 4774 website.

10. Sunrun desires to submit comments but is unable to provide them upon such short notice.

11. Sunrun respectfully requests an extension and leave to submit comments by Wednesday December 20, 2017. Sunrun agrees to adhere to the remainder of the procedural schedule.

12. Granting this request will not prejudice or cause undue hardship to the public interest or the rights of any participant.

Please direct service of any correspondence or pleadings in connection with this

proceeding to:

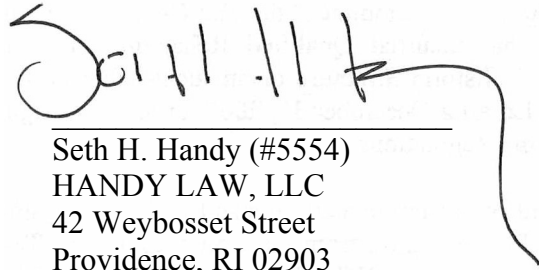
Seth H. Handy
Handy Law, LLC
42 Weybosset Street
Providence, RI 02903
Phone: (401) 626-4839
E-mail seth@handylawllc.com

WHEREFORE, Sunrun asks that the PUC grant this Motion to Intervene and Request for Extension to File Comments.

Respectfully submitted,

SUNRUN, INC.

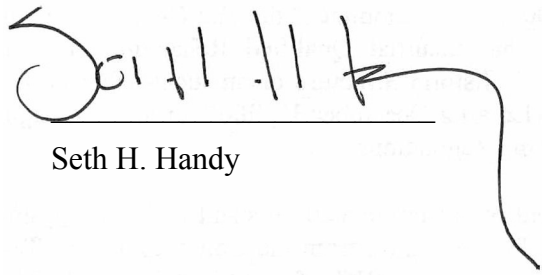
By its attorney,

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 down and to the right.

Seth H. Handy (#5554)
HANDY LAW, LLC
42 Weybosset Street
Providence, RI 02903
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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2017, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and nine (9) photocopies with the PUC.

A handwritten signature in black ink, appearing to read "Seth H. Handy", is written above a horizontal line. A long, curved line extends from the right side of the signature down and to the right, ending near the bottom right of the signature area.

Seth H. Handy