

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

IN RE: RENEWABLE ENERGY GROWTH)
PROGRAM FOR YEAR 2019 RI DISTRIBUTED)
GENERATION BOARD AND NATIONAL GRID)

Docket No. 4892

MOTION TO INTERVENE BY SUNRUN INC.

By its undersigned attorney, Sunrun Inc. (“Sunrun”) moves to intervene in the above captioned proceeding pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure. In support of this motion and request Sunrun states:

1. Sunrun is the largest residential solar, storage, and energy services company in the country, with more than 200,000 customers in 23 states, the District of Columbia and Puerto Rico. Sunrun pioneered the “solar-as-a-service” model 11 years ago to make solar energy more accessible. Sunrun believes there is a better, less expensive, and cleaner way for families to power their homes, and with Sunrun’s residential rooftop solar, storage, and energy services, homeowners are saving money, dramatically reducing their greenhouse gas footprint, and becoming energy management partners capable of delivering grid benefits and lowering system costs for all Rhode Island ratepayers.
2. Sunrun has an ownership or other interest in renewable energy generation projects in Rhode Island.
3. Sunrun has been an active participant in other dockets before the PUC, including the Power Sector Transformation Initiative and was a party to the 2018 Renewable Energy Growth Program proceeding.
4. Rule 1.13(b) provides that any person with an interest which may be directly

affected and which is not adequately represented by existing parties as to which movants may be bound by the Commission's action in the proceeding may intervene.

5. National Grid filed its 2019 Renewable Energy Growth Program on November 15, 2018 ("2019 RE Growth Filing") proposing certain tariff and rule changes, including tariff changes to provide the Office of Energy Resources the right to inspect any system enrolled in the program and impose payment suspension or termination under the tariff for failure to facilitate the inspections; updates to the dates, prices, and class sizes; and rule amendments to clarify required documentation or data that must be included with applications or prior to a project's operation; and amendments that National Grid asserts clarify that incomplete or inaccurate applications will be rejected instead of placed on "hold" for the customer to correct, which will clarify applicant's queue positions as the program closes each year.

6. Sunrun develops residential projects pursuant to the RE Growth program and will develop additional renewable energy projects under the 2019 RE Growth program year. The proposed tariff and rule amendments directly affect Sunrun's participation in the RE Growth Program and planned renewable energy projects in which Sunrun has an interest. The manner and extent to which these changes will impact Sunrun and its customers will depend upon the PUC's consideration of the proposed amendments, and if approved how National Grid implements them.

7. Sunrun is an active participant in regulatory proceedings and policy discussions in states across the country and supports efforts and policies to ensure high-quality solar and energy storage installations. Sunrun's participation can provide insights on best practices to improve the quality of residential solar installations in Rhode Island to achieve the PUC, Distributed Generation Board and Office of Energy Resources goals for the orderly

and efficient implementation of the RE Growth Program.

8. Sunrun will advocate positions to advance the implementation of the RE Growth Program and any tariff or rule amendments adopted by the PUC in a manner that promotes program transparency and consistency and does not impose unnecessary burdens upon applicants, and such other positions that are consistent with Sunrun's goals of ensuring that rooftop solar and energy storage are deployed efficiently and economically.

9. Sunrun's interests are directly affected by this proceeding and Sunrun's interests are not represented, and will not be represented, by any other intervenor.

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

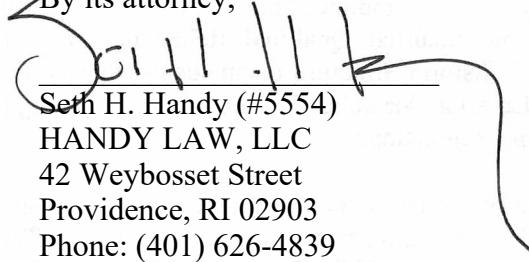
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WHEREFORE, Sunrun asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

SUNRUN INC.

By its attorney,



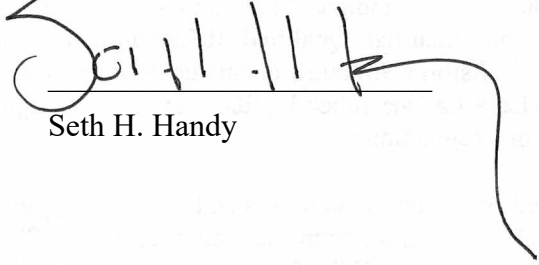
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Dated this 30th day of November, 2018

Counsel to Sunrun Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2018, 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.


Seth H. Handy