

**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 SUNRUN, 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: Please refer to the diagram on page 2 in the SolarEdge manual located on [this website](#):

https://www.solaredge.com/sites/default/files/se_storedge_inverter_datasheet_na.pdf.

Below are a few referenced certification standards and specifications:

- The SolarEdge StorEdge [specifications sheet](#) (https://www.solaredge.com/sites/default/files/se_storedge_inverter_datasheet_na.pdf), [UL 1741](#) (<https://www.solaredge.com/sites/default/files/se-storedge-connection-unit-atm-na.pdf>), and [UL 9540](#) (https://www.solaredge.com/sites/default/files/se_storedge_atm_ul_na.pdf) certifications.
- The LG Chem battery is certified to UL 1642 for the Cell and UL 1973 for the Battery Pack.

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: Please see response to Division data request 1-4 “Sunrun is financially and legally responsible, due to claiming the Federal Investment Tax Credit, to ensure that the battery is charged only from onsite photovoltaic generation. Please also reference the setting configurations explained to answer to 1-3. Thus, there is no need to monitor settings for systems that have been approved by National Grid to operate...”

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: SUNRUN does not intend to change the way it sizes its customers' solar net metering systems. Consistent with National Grid's position, it is Sunrun's position that with respect to Net Metering eligibility, the solar+storage system capacity is equal to 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 Division data request 1-5.

Prepared by or under the supervision of
Becca Polishuk, Esq. and Steven Rymsha

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 Sunrun, Inc.

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

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