

December 19, 2017

**BY ELECTRONIC AND REGULAR MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

42 Weybosset Street  
Providence  
Rhode Island 02903  
401 626.4839  
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RE: Docket 4743 – In Re: Petition of Tesla, Inc. and Sunrun, Inc. for  
Declaratory Judgment or and an Advisory Ruling on R.I. Gen. Laws § 39-26.4  
Tesla, Inc.’s Reply in its Motion to Reopen Docket 4743

Dear Ms. Massaro:

Tesla Inc. submits this reply to National Grid’s Response to Tesla’s Motion to Reopen Docket 4743.

As the Commission is aware, Tesla, Inc. and Sunrun, Inc. filed a petition for a Declaratory Judgment, or, in the alternative, an Advisory Ruling with respect to the eligibility for net metering pursuant to R.I.G.L. § 39-26.4, *et seq.* of (i) solar power generating systems no greater than 25 kW alternating current paired with (ii) battery storage that charges only from the solar power generation system, where (iii) the customer-host does not take electric supply service under a time-varying or time-of-use rate (“Small-Scale Solar Storage Systems”).

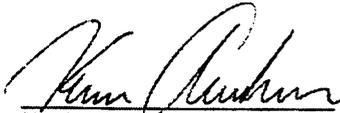
On November 28, 2017, the Commission voted that co-located systems were eligible to net meter that met the above-stated (iii) conditions, and a fourth condition, (iv) a restriction against any exporting to the grid.

On November 30, 2017, Tesla moved to re-open the docket for the limited purpose of addressing the fourth condition. On December 11, 2017, National Grid commented that it did not object to allowing Small-Scale Solar Storage Systems to discharge to the grid “subject to certain strict limitations;” and that if Tesla’s Motion were granted, the Commission should also consider the comments National Grid had earlier filed regarding customer compliance.

Tesla disagrees that any issues beyond the export limit itself need be considered in a re-opened proceeding, or that any additional process is required. Tesla urges the Commission to reopen its decision and remove the limitation on export based on the existing record. Petitioners have already addressed why National Grid’s export conditions are not warranted. Tesla does not intend to introduce any further evidence on

that matter and submit that no additional process is required for resolution.

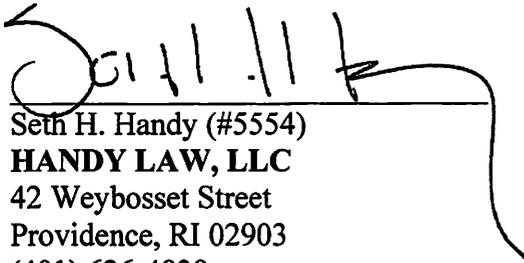
Respectfully submitted,



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By its Attorney,



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