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 OF SUNRUN, INC. FOR LEAVE TO LATE FILE COMMENTS

Pursuant to the Rhode Island Public Utilities Commission's ("Commission") Rules and Regulations Rules 1.15 and 1.6(b), Sunrun, Inc. ("Sunrun") respectfully submits this Motion for Leave to File Late Comments ("Motion") in the above captioned proceeding.

Sunrun acknowledges that the Procedural Schedule for Docket No. 4774 was issued to the Service List on November 30, 2017 and established a Deadline to File Motion to Intervene with Comments on December 14, 2017. Sunrun had not enlisted counsel at that time and was not a party to the Service List for Docket No. 4774 and therefore was not aware that the Procedural Schedule had been issued at that time. Sunrun first became aware of the existence of the Procedural Schedule on December 14, 2017, the date which, to the best of Sunrun's knowledge, the Procedural Schedule became publicly available on the Commission's website for Docket No. 4774. Upon learning that the Deadline to File Motion to Intervene with Comments was December 14, 2017, Sunrun timely submitted a Motion to Intervene and simultaneously requested the Commission grant an extension of time to file comments by December 20, 2017.[1]

Sunrun requested concurrence to late file comments from the parties in Docket No. 4774 by email sent to the service list dated December 19, 2017. National Grid indicated by email response that it intends to object to Sunrun's intervention and this

[1] Sunrun Motion to Intervene at para. 11.

motion to late file comments. As of the time of this filing, no other parties indicated concurrence or objection.

Sunrun was a participant in the 2017 Renewable Energy Growth Program and intends to participate in the 2018 Renewable Energy Growth Program. Sunrun interests will be impacted by the outcome of this proceeding and Sunrun desires to submit comments at this time. Sunrun has a good faith belief that the Procedural Schedule became publicly available on same date that the comments were due and respectfully submits that this constitutes reasonable grounds for granting this Motion.

Sunrun requests the Commission find that Sunrun has shown good cause for granting its December 14, 2017 Motion for Extension of Time to File Comments, that Sunrun has established reasonable grounds for granting this Motion, and that the Commission accept the attached comments into the record in this proceeding.

Respectfully submitted,

SUNRUN, INC.

By its attorney,

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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**

COMMENTS OF SUNRUN, INC.

Sunrun, Inc. ("Sunrun") submits the following comments in response to National Grid's 2018 Renewable Energy Growth Program ("2018 RE Growth Program" or "Program") Tariffs & Rules Changes and Distributed Generation Board's Recommendations for Classes, Ceiling Prices & Targets for the RE Growth Program.

I. Background

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. Sunrun has an interest in ensuring that rooftop solar and energy storage (collectively "distributed energy resources" or "DER") 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 DER

II. Comments

Sunrun appreciates the opportunity to submit these comments on the 2018 RE Growth Program. The increasing success of this Program is a true achievement for the state, but has naturally come with growing pains for RE Growth Program administrators, customers, and developers interested in participating in the RE Growth Program. These

comments offer observations and recommendations to address two significant issues - capacity tracking and proper system sizing.

A. Capacity Tracking

The current RE Growth Program system for reporting available remaining capacity for small scale solar I + II systems is unpredictable and irregular. This creates uncertainty for developers around when sales and customer expectations of the RE Growth Program should be adjusted. The practical impacts of irregular reporting are heightened by the rate at which RE Growth Program capacity has been allocated in recent years. The increase in the rate at which capacity is allocated is demonstrated by comparing the 2016 Program to the 2017 Program capacity allocations where the 2017 RE Growth Program for small scale solar I + II systems was exhausted approximately three times faster than the prior program year. As popularity for small scale solar I + II systems continues to grow, these historic participation levels and capacity allocation rates indicate that the timeframe within which the 2018 RE Growth Program capacity is allocated will similarly shorten.

To reduce uncertainty, Sunrun recommends that National Grid RI improve the transparency of capacity allocation reporting by instituting a live or bi-weekly capacity allocation tracker on its online RE Growth Program website. Establishing a real time or, at a minimum, bi-weekly reporting cadence will provide solar developers and customers greater visibility into RE Growth Program capacity availability. Customers will be better informed of the Program's capacity and have more accurate information about whether their project will be eligible that Program year. Adopting this reporting recommendation will also equip developers with the data necessary to make important business decisions

for operating in the state, such as forecasting sales volume and establishing timelines for when to ramp up and down sales.

We encourage the Commission to require a transparent and regular reporting cadence of capacity allocation by National Grid RI on its RE Growth Program website. This will enhance customer and solar developers' visibility into the Program, providing critical information for both in making investment decisions in the state.

B. Proper System Sizing

National Grid RI's system sizing procedure and formula is a challenge for a significant amount of RE Growth Program (and NEM program) projects sold in the National Grid RI market. These challenges result in adverse impacts on customer expectations, project cycle time, and resource allocation. When there is inconsistency between National Grid RI's sizing and solar industry sizing, at the point of sale of a system, the customer may feel misled when system design corrections occur weeks later during the interconnection application stage. For instance, the system design can change dramatically, which under solar industry internal processes may require modifications to production and savings estimates and thus reevaluation by the customer, followed by a new contract reflecting new terms. Each correction throughout the system design and interconnection application processes has the potential to double a customer's installation timelines.

The challenges of using National Grid RI's system sizing requirements are therefore resource intensive for both solar developers and customers and may lead to legitimate customer frustration. This could also contribute to unused, but *allocated*, RE Growth capacity, thus shortening the program year.

Corrections to system size also demand more time from both National Grid RI and the solar developer operations staff. Sunrun commends National Grid RI's Operations Staff, who are readily available, and provide maximum system size estimates along with their corrections, thus reducing the need for additional corrections in the future. However, the Commission could relieve both developer and National Grid RI operations teams of these unnecessary burdens with clear direction to National Grid RI to revise its system sizing policies. We propose the following three recommendations to revise National Grid RI's current system sizing policies:

1. Issue guidance for an alternative to the three year consumption history requirement for system sizing when that three year history is not available;
2. Establish uniform system sizing methodologies for the NEM Program and the RE Growth Program by using the same historic consumption values and the AC capacity of the system as the inputs to the system size equation; and
3. Allow developers to incorporate site specific conditions into system size calculations.

1. Provide an Alternative to the Three-Year Consumption History Requirement

Sunrun operates in 66 utility territories nationwide (including National Grid MA and National Grid NY). National Grid RI is the only entity that requires more than one year of customer electricity consumption data to size a system. Average customer electricity consumption data rarely changes year-over-year. A residential customer can easily provide one year of consumption data to a developer via a copy of their utility bill. Sunrun understands that the three-year requirement is established by statute; however, there are significant operational challenges to obtaining this customer data and we urge the Commission to provide guidance for an alternative to this requirement when three-year consumption history is unavailable.

It is our understanding that currently obtaining a record of a customer's three years of electricity consumption data is extremely difficult, and often times unattainable, for developers, customers, or National Grid RI Staff. Sunrun understands that one year of electricity consumption data can be found on a customer's utility bill, two years of electricity consumption data can be found within a customer's online utility portal, but three years of electricity consumption data is rarely available within any National Grid RI system. National Grid RI is aware of this data collection issue and has communicated that two years of consumption data available through the online portal is sufficient to size systems.

Given the significant gap in the availability of the data required by statute and the availability of data on the online portal, Sunrun recommends that National Grid RI issue a clear communication to solar developers with guidelines for systems to be approved with the information available in the online portal. This will help streamline the process for all systems and eliminate the current need to have frequent back and forth communication between solar developers and National Grid RI Operations on an individual project basis.

2. Establish Uniformity in System Sizing Methodologies

The sizing methodology used by National Grid RI to size systems under RE Growth Program is calculated and measured differently than National Grid RI's Net Energy Metering (NEM) Program. The National Grid RI methodology is also more complicated for customers than the National Grid MA methodology. To illustrate these differences, the system sizing methodologies and equations for the National Grid MA

NEM Program and the National Grid RI NEM Program and RE Growth Program, are as follows:

- National Grid MA NEM: *Usage (kWh) = max system size (AC nameplate kW)*
- National Grid RI NEM: *Usage (kWh)/8760*.161 = max system size (DC kW)*
- National Grid RI RE Growth: *Usage (kWh)/8760*.14 = max system size (AC nameplate kW)*

Imposing different sizing methodologies for the National Grid RI NEM Program and RE Growth Program creates unnecessary complications for developers and customers. These complications can be resolved, however, by creating a uniform system sizing methodology that applies to both the NEM Program and the RE Growth Program. To achieve this consistency, and to better size systems, Sunrun recommends adopting the National Grid MA system sizing methodology described above for the National Grid RI NEM Program and RE Growth Program.

3. Allow for Consideration of Site-Specific Characteristics in System Sizing

National Grid RI's current sizing methodology equation prevents developers from using site conditions to provide customers with a system size that will meet their specific needs. For example, a customer with a heavily shaded roof could end up with a solar system that is undersized when compared to their usage. A customer without shading on their roof could end up with a system that is too large and produces more energy than needed. Developers who strictly apply the National Grid RI sizing equations will continue to regularly encounter these over- or under-sizing challenges.

Sunrun incorporates site conditions as a best practice in other states, but National Grid RI's sizing equation constrains our ability to implement this best practice and thereby diminishes our ability to provide customers with unique site conditions the full solar service they require. To resolve this issue, Sunrun recommends the Commission

adopt system sizing guidelines similar to those used in Massachusetts, which are driven by the National Renewable Energy Laboratory's PVWatts calculator and can be used to consider site specific conditions in order to size systems.

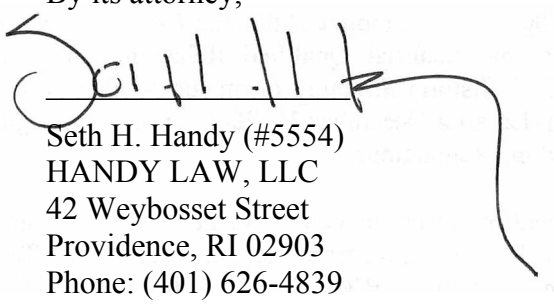
III. CONCLUSION

Sunrun appreciates the opportunity to submit these comments and the Commission's consideration of the observations and recommendations offered herein.

Respectfully submitted,

SUNRUN, INC.

By its attorney,



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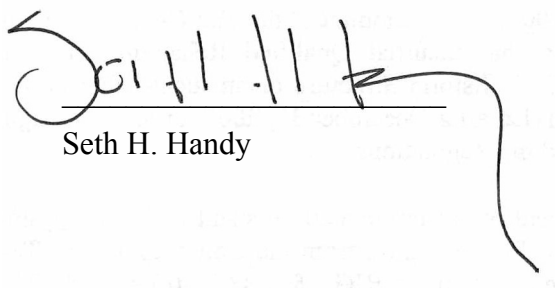
CERTIFICATE OF SERVICE

I hereby certify that on December 20 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.



Seth H. Handy