February 14, 2018

VIA FIRST-CLASS MAIL AND ELECTRONIC MAIL

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

RE: Docket 4783 - Comments of Sunrun Inc. In Response to National Grid's Proposed FY 2019 Electric Infrastructure, System and Reliability (ISR) Plan

Sunrun Inc. ("Sunrun") submits the following comments in response to National Grid's ("the Company") proposed FY 2019 Electric Infrastructure, System and Reliability ("ISR") Plan filed on December 21, 2017.

Sunrun is a leader in residential solar, storage, and energy management. We pioneered the "solar-as-a-service" model 10 years ago, and today Sunrun is the largest dedicated residential solar company in the United States. Sunrun believes there is a better, less expensive, cleaner way for families to power their homes and with Sunrun's residential rooftop solar, storage and energy services, homeowners are saving money while dramatically reducing the amount of air pollution and carbon dioxide released into the atmosphere. As a leader in residential distributed energy resource ("DER") deployment, Sunrun has a high interest in the evolution of the electric grid, utility business models, and rate design.

Sunrun commends the state of Rhode Island for taking a leadership position in grid modernization and distributed energy deployment to deliver the most cost effective solutions and greatest value to electric ratepayers in the state. Consistent with prior comments submitted in the Power Sector Transformation Initiative and other dockets regarding grid modernization and planning efforts, we believe that the Company's current proposed FY 2019 Electric ISR Plan lacks consideration of solutions to leverage DERs as an alternative to traditional utility investments. Our brief comments focus on areas within the proposed FY 2019 Electric ISR Plan that we believe require additional attention for future planning efforts to ensure the most cost effective approach is taken to minimize costs and maximize benefits for Rhode Island ratepayers.

I. We encourage the Company to consider Behind-The-Meter (BTM) solar + storage systems and Non Wire Alternatives (NWA) in its System Capacity and Performance Projects to maximize system benefits and minimize costs for Rhode Island electric ratepayers.

For FY 2019, the Company is proposing a $45.8 million budget for System Capacity and Performance projects.[1] There are several key opportunities for DER deployment in the Company's proposed plan including: Load Relief, Voltage Optimization Expansion, and Advanced Metering Pilot. In order for Rhode Island's electric consumers to benefit from grid modernization, the State must not only spend wisely on the Company's Capital Investments, but also be planning for a future where behind-the-meter ("BTM") assets, such as solar + storage paired systems, will provide deferral, grid support, and situational awareness for the Company.

Non-Wire Alternatives ("NWAs") are being leveraged in a growing number of states, and we encourage Rhode Island to consider how NWAs can assist in the modernization and evolution of its grid. Policy decisions in New York and California have enabled the Electric Utilities to procure lower cost solutions from BTM DERs to provide services such as Load Relief for the benefit of the electric ratepayers.[2] California and New York have been the leaders in enabling utility procurement and solicitation of NWAs, but we must not also overlook how DER program design can address the Electric Utilities' needs. On February 12, the California Public Utility Commission took the next step forward on how to further leverage NWAs by expanding the scope of the Integrated Distributed Energy Resources proceeding to evaluate how a tariffed approach could be used to source distributed energy resources on an expedited basis.[3]

We believe that the Company's Capacity Planning Process Tasks must further evolve to incorporate specific evaluation for NWAs. While the Company considered NWAs, no details have been provided regarding its analysis. Without understanding the study and evaluation of the NWAs, stakeholders cannot learn from this analysis in order to improve the Company's Capacity Planning Process for the benefit of Rhode Island's electric ratepayers. We encourage a further examination of how NWAs can help Rhode Island meet its grid modernization goals, as well as increased transparency on its study and evaluation to facilitate greater understanding by stakeholders that may be able to offer solutions.

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[1] National Grid. Electric Infrastructure, System and Reliability FY 2019 Proposal, Section 2: Electric Capital Investment Plan, pp. 13, 30.

[2] New York Public Service Commission, Case 14-M-0101, Order Adopting Distributed System Implementation Plan Guidance, p. 35, April 20, 2016 and California Public Utilities Commission, Integrated Distributed Energy Resources. Available at: http://www.cpuc.ca.gov/General.aspx?id=10710.

[3] California Public Utilities Commission, Rulemaking 14-10-003, Amended Scoping Memo of Assigned Commissioner and Joint Ruling with Administrative Law Judge, February 12, 2018. Available at: http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M209/K611/209611862.PDF.

II. BTM DERs should be integrated with the Company's Volt VAR Optimization and Conservation Voltage Reduction plan and Advanced Metering Infrastructure Pilot Program to ensure the state is fully examining and capturing the capabilities of these assets.

The Company's Volt VAR Optimization and Conservation Voltage Reduction ("VVO/CVR") Expansion plan must consider how a proliferation of BTM DERs can provide these grid services. Research by SolarCity determined that Distributed PV with smart inverters can increase the benefits of utilities' CVR schemes by over 10%. These improvements reduce customer energy consumption and peak demand by 0.4% annually, resulting in benefits of 1.0¢ to 2.9¢ for every kilowatt-hour ("kWh") of PV generation.[4] With the continued expansion of the Company's voltage management efforts, Rhode Island must further examine ways to leverage DERs for added electric ratepayer benefits that these resources can provide.

Additionally, while the Company's plans for the Advanced Metering Infrastructure ("AMI") Pilot Program are admirable, the plan misses a critical opportunity to leverage DERs and third-party services. Sunrun supports the increased utilization of advanced metering; however, we believe the proposed efforts should be expanded to provide greater learning and utilization of targeted infrastructure deployment that also leverages third party equipment, data, and networks. This approach will be forward looking to leverage the capabilities that DERs can provide and cost effective as the marketplace will provide much better price signals than the plan specific to utility investment.

III. Conclusion

Rhode Island is presented with a unique opportunity to be a leader in grid modernization, specifically in deploying strategies that incorporate DERs to meet the needs of the evolving electric grid. Other states, including New York and California, are implementing processes and plans to increase deployment of DERs, and Rhode Island is well suited to be progressive and forward looking in its implementation of the Company's FY 2019 Electric ISR Plan. As the state challenges the status quo through this process, it is critical that DERs be thoroughly and thoughtfully considered as assets that can contribute to the state's efforts to modernize the electric grid and deliver the best experience to electric ratepayers in the state. Sunrun encourages Rhode Island to leverage DERs in its grid modernization efforts to encourage new business investments and fully capture the benefits that these systems provide to the grid and ratepayers.

Respectfully submitted,

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cc: Docket No. 4783 Service List

[4] SolarCity Grid Engineering. Energy Efficiency Enabled by Distributed Solar PV via Conservation Voltage Reduction. June 2016. Available at: http://www.solarcity.com/sites/default/files/SolarCity-CVR_Benefits_Methodology-2016-06-28_v2.pdf