

**THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 16-241

Eversource Energy

**Petition for Approval of Gas Infrastructure Contract with Algonquin Gas Transmission,
LLC**

PETITION TO INTERVENE OF SUNRUN, INC.

Pursuant to New Hampshire Code of Administrative Rules 203.17 and Revised Statutes § 541-A:32, Sunrun, Inc. (Sunrun), by and through its undersigned counsel, respectfully submits this Petition to Intervene (Petition) in the above proceeding.

1. Introduction

Sunrun is the nation's largest dedicated residential rooftop solar company. The company designs, installs, monitors and maintains solar panels on homeowner rooftops. Sunrun has more than 500 customers in New Hampshire as well as local partners and a local workforce. The rooftop solar market in New Hampshire has been driven by New Hampshire residents' desire to assert control over their electric bills, and Sunrun strongly supports the continuation of this trend. Sunrun is committed to offering the state's citizens a viable choice in energy providers and providing near-term, low-cost and customer-based solutions to integrate renewable energy resources and improve operational efficiencies that preserve both the health of the solar industry and the public interest at large.

Under RSA 541-A:32, a petition to intervene shall be granted if the petitioner demonstrates that they have "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention." Sunrun has a

substantial interest in this proceeding and Sunrun's intervention will not impair the interests of justice and orderly and prompt conduct. Sunrun therefore respectfully requests that the New Hampshire Public Utilities Commission (Commission) grant this Petition.

2. Sunrun's rights, duties, privileges or other substantial interests will be affected by this proceeding

Sunrun has a direct and substantial interest in this proceeding because we work to develop local employment opportunities through clean energy and to help homeowners have a choice in how they get their energy. This proceeding arises from Eversource Energy's (Eversource) Petition seeking approval of a gas infrastructure contract (contract) between Eversource and Algonquin Gas Transmission, LLC (Algonquin). If granted, the Petition would give Eversource control over residents' energy choices, plus impose higher costs on them in advance. Prior to launching into natural gas contracts and pre-billing ratepayers for an energy source that may not deliver as promised, New Hampshire should look to locally-sourced clean energy like solar, which is already popular among homeowners and has created hundreds of jobs in the state. Sunrun has direct involvement in the state's solar industry, solar workforce and clean energy future and as such, this proceeding is directly relevant to us.

3. The interests of justice and orderly and prompt conduct will not be impaired by allowing Sunrun to intervene in this proceeding

Sunrun's intervention will not impair the interests of justice or the orderly and prompt functioning of this proceeding. Sunrun's participation in this proceeding will be limited to the scope of issues and timelines the Commission establishes, thereby ensuring the orderly and prompt conduct of this proceeding.

4. Conclusion

For the foregoing reasons, Sunrun respectfully requests the Commission grant this Petition.

Respectfully submitted,

/s/ Joseph F. Wiedman

Joseph F. Wiedman
KEYES, FOX & WIEDMAN LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Telephone: 510-314-8202
Email: jwiedman@kfwlaw.com

Counsel for Sunrun, Inc.

March 10, 2016