

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 17-136

Electric and Gas Utilities

2018-2020 New Hampshire Statewide Energy Efficiency Plan

PETITION FOR INTERVENTION OF SUNRUN INC.

Sunrun Inc. (“Sunrun”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the September 24, 2019 Supplemental Order of Notice for 2020 Plan Update, N.H. Admin. Rules Puc 203.17, and in accordance with the standards of RSA 541-A:32. In the Supplemental Order of Notice, the Public Utilities Commission (“Commission”) provided notice of a proceeding to consider the 2020 Update to the 2018-2020 Statewide Energy Efficiency Plan (“2020 Plan Update”). In its Supplemental Order of Notice, the Commission directed interested parties to seek intervention by October 4, 2019.

In support of its petition to intervene, Sunrun states as follows:

New Hampshire Code of Administrative Rules Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32. RSA 541-A:32 provides that 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.” As demonstrated herein, Sunrun has substantial interests that will be affected by the outcome of this proceeding and its intervention will not impair the interests of justice and orderly and prompt conduct. Sunrun respectfully requests that the Commission grant this petition.

The Commission's Order of Notice states that the purpose of this docket is to examine:

- whether the proposed programs in the 2020 Plan Update are reasonable, cost effective, and in the public interest;
- whether the proposed programs will properly utilize funds from the Energy Efficiency Fund, as required by RSA 125-O:23; and
- whether, pursuant to RSA 374:2, the Electric Utilities' and Gas Utilities' proposed calculations of performance incentives and lost base revenues are just and reasonable and comply with Commission orders.

The 2020 Plan Update under review in this proceeding proposes to continue and begin a range of energy efficiency-related activities. Sunrun's interests lies primarily in the Bring Your Own Device ("BYOD") Residential Demand Reduction Initiative proposed to be launched by Eversource and Unitil in 2020.¹ Specifically, the utilities propose to "pay an incentive for verifiable load reductions using a customer-owned behind-the-meter deliver" in order to reduce load during summer peak periods.² The incentive would be performance-based.³ The utilities provide two examples of potential BYOD scenarios, the first involving a customer with an existing wi-fi thermostat and central cooling, the second involving a customer with an installed residential battery storage system that "allows the Company or its vendor to dispatch that battery for some number of hours per year."⁴ In the case of the customer with battery storage, Eversource and Until envision providing a rebate of \$900-\$1,400 per year in exchange for dispatching the customer's battery multiple times during the course of the summer in order to lower costs for all customers during summer peak periods and to achieve other associated

¹ 2020 Plan Update at 30-31.

² *Id.* at 31.

³ *Id.*

⁴ *Id.*

benefits.⁵ The utilities' proposed residential demand response initiative appears to entail expenditures of \$250,559 in 2020 and to involve 1,020 participating customers.⁶

Sunrun's rights, duties, privileges, or other substantial interests will be directly affected by this proceeding. RSA 541-A:32. Sunrun has substantial corporate interest and substantive expertise in the area of residential battery storage, and Sunrun has specific interest and industry-leading expertise in BYOD active demand response programs involving residential battery storage.

Sunrun is the national leader in residential solar, storage, and energy management with over 240,000 customers in 23 states, including New Hampshire, as well as the District of Columbia and Puerto Rico. Sunrun pioneered the "solar-as-a-service" model over a decade ago and today is the largest dedicated residential solar, storage, and energy services company in the United States. Sunrun is directly involved in New Hampshire's solar industry and clean energy future and its business creates local employment opportunities through solar and solar + battery storage installations. Sunrun is a strong proponent of utilizing residential battery storage for grid services including peak demand reduction in New England and elsewhere, and currently participates as a residential battery storage aggregator in a number of similar programs.

Sunrun has substantial interests in certain specific issues implicated by this proceeding, including ensuring that residential battery storage technologies are deployed efficiently, economically, and in a manner that provides optimal benefits, that solar and battery storage market participants are allowed to compete on a fair playing field, and that utility program design is fair, clear, and transparent. Sunrun launched its BrightBox product (solar paired with battery storage) in Hawaii in 2016, the first such installation in the United States, and now offers

⁵ *Id.*

⁶ *Id.* Attachment B at 3.

BrightBox in states across the country. Sunrun supports the goals of reducing peak demand and lowering customer costs through the deployment of batteries. Indeed, Sunrun currently provides battery aggregation and other energy management services that achieve similar goals and benefits in other markets.

Sunrun is evaluating the utilities' proposal and does not take a position on it at this time. As stated earlier, Sunrun is generally supportive of BYOD battery storage initiatives and it also generally supports performance-based payment models. Nonetheless, initiatives such as the one proposed in this proceeding are important to get right. The instant proposal raises important questions about the role residential battery storage can play in providing peak demand reduction services (among other services), and may also raise important questions about related subjects of concern to Sunrun, including the benefits of third-party aggregated battery storage, the value of solar + storage, and questions of cost and quality of service that Sunrun has a unique interest in, and concerning which Sunrun also has valuable expertise to offer.

Sunrun has previously participated constructively in a number of proceedings before this Commission, including Docket No. DE 16-576, as part of the Alliance for Solar Choice ("TASC"), and in Docket DE 17-189, regarding the Liberty Utilities battery storage pilot that similarly targets peak demand reduction through the dispatch of residential battery storage.

Sunrun's participation is in the interests of justice and the orderly and prompt conduct of the proceeding and will neither delay nor disrupt this proceeding.

WHEREFORE, Sunrun Inc. respectfully requests that the Commission grant its petition to intervene in Docket No. DE 17-136.

Respectfully submitted,



Melissa E. Birchard, Esq.
Keyes & Fox LLP
18 Loudon Rd., Box 1393
Concord, NH 03302
Tel.: 857-276-6883
E-mail: mbirchard@keyesfox.com

Dated October 1, 2019

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition and Appearance have, on this 1st day of October, 2019, been sent by email to the service list in Docket No. DE 17-136.



Melissa E. Birchard