

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

Docket No. DE 19-133

**Public Service Company of New Hampshire
d/b/a Eversource Energy**

Petition for Preauthorization of Westmoreland Clean Innovation Project

PETITION FOR INTERVENTION OF SUNRUN INC.

Sunrun Inc. (“Sunrun”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the August 30, 2019 Order of Notice, N.H. Admin. Rules Puc 203.17, and in accordance with the standards of RSA 541-A:32. In accordance with the aforementioned Order of Notice, the Public Utilities Commission has initiated a proceeding to consider the petition of Eversource Energy (“Eversource”) for approval and pre-authorizations related to the Westmoreland Clean Innovation Project. In its Order of Notice, the Commission directed interested parties to seek intervention by September 17, 2019.

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

1. 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.⁷

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

- whether the proposed project is consistent with the Commission's directive in Order No. 26,124;
- whether the project would be in the public interest pursuant to RSA 374-G:5, II;
- whether the use of System Benefits Charge ("SBC") funds for targeted energy efficiency and load management is consistent with RSA 374-F:4, VIII;
- whether the project will provide a net benefit to Eversource customers;
- whether the estimated costs of the project are prudent and reasonable; and
- other issues regarding the implementation and timing of the project.

3. The project Eversource requests that the Commission approve includes the creation of a portfolio of energy efficiency, demand response (including battery storage), and Eversource-owned battery storage. Eversource also seeks preauthorization for capital expenditures estimated at \$7 million, as well as an annual average of \$140,000 in Operations & Maintenance expenses related to the battery storage component of the proposed project.

4. Sunrun's rights, duties, privileges, or other substantial interests will be directly affected by this proceeding. RSA 541-A:32. Sunrun is the leader in residential solar, storage, and energy management with over 160,000 customers in 22 states, including New Hampshire, and the District of Columbia. Sunrun pioneered the "solar-as-a-service" model more than ten years ago and today we are 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 our business creates local employment opportunities through solar and solar + battery storage installations. In addition, we participated in the net metering docket that helped

give rise to this petition, Docket No. DE 16-576, as part of the Alliance for Solar Choice. We also participated in Docket DE 17-189, the Liberty Utilities battery storage docket.

5. Sunrun has substantial interests in ensuring that solar and battery storage technologies are deployed efficiently and economically, that solar and battery storage market participants are allowed to compete on a fair playing field, 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 solar and/or battery storage. Sunrun launched its BrightBox product (solar paired with battery storage) in Hawaii in 2016, the first such installation in the United States, and we now offer BrightBox in states across the country.

6. 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.

7. Sunrun is currently evaluating Eversource's proposal and does not take a position on it at this time. However, the proposal raises important questions about the role of rate-regulated monopoly utilities in the competitive market for battery storage products and services that implicate Sunrun's interests, as well as questions of cost and quality of service that Sunrun may be able to shed light on.

8. 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 19-133.

Respectfully submitted,

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