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CASE MANAGEMENT

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

PUBLIC SERVICE ELECTRIC AND GAS COMPANY)
IN THE MATTER OF THE PETITION OF PUBLIC)
SERVICE ELECTRIC AND GAS COMPANY FOR) DOCKET NO.
APPROVAL OF ITS CLEAN ENERGY FUTURE-) EO18101111
ELECTRIC VEHICLE AND ENERGY STORAGE ("CEF-)
EVES") PROGRAM ON A REGULATED BASIS)

**MOTION FOR LEAVE TO LATE FILE AND
MOTION TO INTERVENE OF SUNRUN INC.**

Sunrun Inc. ("Sunrun") hereby moves before the New Jersey Board of Public Utilities ("Board"), pursuant to N.J.A.C. 1:1-16.1 *et seq.*, and Board Order issued October 29, 2018 in the above-captioned docket to permit Sunrun to late file its motion to intervene as a party in the above-captioned proceeding and to permit Sunrun to intervene with all of those rights and obligations typically afforded to an intervenor in such proceedings. In support of its motion, Sunrun states as follows:

1. On October 11, 2018, Public Service Electric and Gas Company ("PSE&G") initiated the above-captioned proceeding by filing a Petition requesting approval of its proposed Clean Energy Future – Electric Vehicle and Energy Storage Program ("CEF–EV & ES Program") to install 35 MW of energy storage capacity across the PSE&G distribution system over six years.¹ The CES-EV & ES Program proposal includes estimates of a commitment of up to \$109 million of investment in five energy storage subprograms over six-year period, and approximately \$70 million in expenses.² PSE&G states the energy storage subprograms are "designed to incorporate utility-scale

¹ PSE&G Petition for Approval of Clean Energy Future – Electric Vehicle and Energy Storage Program On A Regulated Basis (Oct. 11, 2018) at 8 ("Petition for CEF – EV & ES Program").

² *Id.* at 6.

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energy storage into the Company's distribution system to optimize electricity costs for PSE&G's customers, support grid operations, and facilitate the integration of renewables on the PSE&G grid."³

2. On October 29, 2018 the Board issued an order setting the date for intervention in this proceeding for November 13, 2018.⁴ Sunrun misunderstood the date for filing for intervention in this docket as November 16, 2018 based on its understanding of the relationship between this proceeding and PSE&G's related Clean Energy Future - Energy Efficiency Program in Docket Nos. GO18101112 & EO10121113 and Clean Energy Future - Energy Cloud Program in Docket No. EO18101115, for which the Board established November 16, 2018 as the deadline for intervention. As discussed herein, Sunrun has a direct and substantial interest in the outcome of this proceeding and respectfully requests the Board to grant its motion for leave to late file the motion to intervene. Granting this motion will not prejudice any of the other parties in the proceeding and will not cause undue delay to the proceeding.

3. Sunrun is the largest residential solar, storage, and energy services company in the country, with more than 200,000 customers in 23 states, the District of Columbia and Puerto Rico. Sunrun has operated in New Jersey for nearly a decade and serves thousands of customers in the state, including customers in PSE&G's territory. Sunrun pioneered the "solar-as-a-service" model 11 years ago to make solar energy more accessible. Sunrun believes there is a better, less expensive, and cleaner way for families to power their homes, and with Sunrun's residential rooftop solar, storage, and energy

³ *Id.* at 7.

⁴ Docket No. EO18101111, Order Designating a Commissioner and Setting a Bar Date and Manner of Service (October 28, 2018).

services, homeowners are saving money, dramatically reducing their greenhouse gas footprint, and becoming energy management partners capable of delivering grid benefits and lowering system costs for all New Jersey ratepayers.

4. N.J.A.C. 1:1-16.1(a) provides the standard for intervention in a proceeding before this Board. The party seeking to intervene must show that it will be substantially, specifically and directly affected by the proceeding in question. In granting a motion to intervene, the Board must consider the nature and extent of the movant's interest in the outcome of the case; whether the movant's interest is sufficiently different from that of any party so as to add constructively to the scope of the case; and whether there is the prospect of confusion or undue delay arising from the movant's inclusion. N.J.A.C. 1:1-16.3(a).

5. The outcome of this proceeding will have a substantial impact on the energy storage and renewable energy market in PSE&G's service territory, including the residential solar and energy storage market, and as a residential solar and energy storage provider in PSE&G's territory, the outcome of this proceeding will have a substantial, specific and direct impact on Sunrun's interests.

6. Sunrun commends PSE&G's efforts to incorporate energy storage into its resource portfolio to support New Jersey's clean energy goals,⁵ however, Sunrun is concerned that residential behind-the-meter ("BTM") energy storage assets is not included as part of the proposed CEF-EV & ES Program. BTM energy storage assets, including those paired with distributed solar PV, are a critical component of the clean

energy objectives that PSE&G states the CEF-EV & ES Program aims to achieve. This is the case both from the perspective of the CEF-EV & ES Program's stated objective to facilitate the integration of renewables on the PSE&G grid as well as, the ability of BTM storage and storage paired with solar assets to play a role in achieving the same objective.⁶

7. Sunrun respectfully submits that in this proceeding the Board should explore opportunities for deploying a residential BTM battery storage program as part of or in addition to those proposed in CEF-EV & ES Program for the benefits of ratepayers, the utility and the grid. For example, Sunrun supports the development of tariff structures that will enable more customers to utilize battery storage and share the benefits of the technology with all ratepayers, such as bring-your-own-device ("BYOD") tariffs being developed in New York and New England that enable customers to purchase batteries from any supplier and receive credits from the utility on their monthly bills. This approach makes customers true partners with the utility in the effort to reduce costs, shift peak consumption, enhance grid resiliency, and facilitate the integration of renewable generation resources on the grid.

8. Sunrun's interests are distinct from those of other participants in this proceeding. Specifically, Sunrun brings to this proceeding the unique experience and perspective of a developer of residential solar and energy storage operating in the

⁵ *Id.* at 8 stating ("Zero carbon and low carbon generating resources are vital to maintaining a clean energy future and energy storage is expected to be an important resource that New Jersey and its utilities can use to support clean energy goals.").

⁶ *Id.* at 2 stating (if approved, the CEF-EV & ES Program "will further the State's goals by, among other benefits: (a) reducing greenhouse gas emissions; (b) creating "green jobs;" (c) launching the electric vehicle industry and energy storage technology in New Jersey; and (d) making the electric grid more reliable, resilient, and safe.").

PSE&G service territory. Therefore, Sunrun's interests in this proceeding are unique on both a quantitative and qualitative basis, and its participation would add measurably and constructively to the scope of the case.

9. Notwithstanding its unique interests, where it is possible and practical for it do so, Sunrun will endeavor to work cooperatively with other parties in this proceeding in the interests of collaboration and administrative efficiency and economy.

10. Finally, intervention by Sunrun will not cause confusion or delay the conclusion of this proceeding. Rather, Sunrun's intervention will clarify certain issues and contribute to the development of a complete record based on its unique, significant interests, which, as noted above, are substantial and directly affected by this proceeding and different than those of any other party to the proceeding. Sunrun accepts the record "as-is", and will not seek to delay the proceeding in any manner.

11. The Certification of Anne Hoskins is attached hereto certifying that the facts and statements herein are true and accurate to the best of his knowledge and belief.

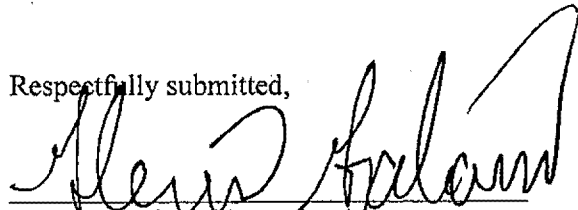
12. All communications and correspondence concerning this proceeding should be directed to:

Lauri A. Mazzuchetti
Glenn T. Graham
Kelley Drye & Warren LLP
One Jefferson Road, 2nd Floor
Parsippany, New Jersey 07054
lmazzuchetti@kelleydrye.com
ggraham@kelleydrye.com

In addition to the foregoing, Sunrun submits that fundamental fairness and due process require that the Board grant its Motion to Intervene as a party in the above matter and to grant such further relief as it deems is just, reasonable and proper.

WHEREFORE, pursuant to N.J.A.C. 1:1-16.1 et seq., Sunrun respectfully requests that it be permitted to intervene, with full procedural and substantive rights, in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Glenn T. Graham", is written over a horizontal line.

Lauri A. Mazzuchetti

Glenn T. Graham

Kelley Drye & Warren LLP

One Jefferson Road, 2nd Floor

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Attorney for Sunrun Inc.

Dated: November 16, 2018

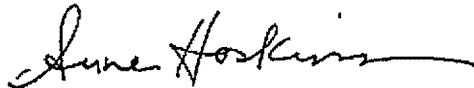
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CERTIFICATION OF NAME

Anne Hoskins, of full age and upon my oath, deposes and says:

1. I am Anne Hoskins, Chief Policy Officer at Sunrun Inc.
2. I am authorized to make this statement on behalf of Sunrun Inc.
3. I have received the attached Motion to Intervene and certify that the facts set forth therein are true and accurate to the best of my knowledge and belief.



Anne Hoskins

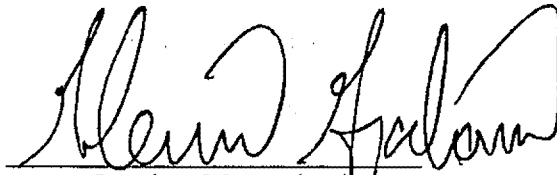
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CERTIFICATION

Pursuant to R. 1:4-4(c), I am an attorney-at-law duly admitted to practice in the State of New Jersey, certify that Anne Hoskins has acknowledged that the signature on the electronic transmission is her signature. I further certify that the original document bearing the original signature will be filed if requested by the Board or any party to this proceeding.



Lauri A. Mazzuchetti
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Dated: November 16, 2018

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ELECTRIC VEHICLE AND ENERGY STORAGE)
("CEF-EVES") PROGRAM ON A REGULATED BASIS)

CERTIFICATE OF SERVICE

I, Blake Elder, hereby certify that I have this day caused a copy of the foregoing document to be served upon the official service list for EO18101111, attached hereto, by electronic mail to all persons with a valid email address. Two copies have also been sent to each party via U.S. Mail.

Dated: November 16, 2018.

/s/ Blake Elder

Blake Elder

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