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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

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NOV 23 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

IN THE MATTER OF THE PETITION OF PUBLIC )  
SERVICE ELECTRIC & GAS COMPANY FOR )  
APPROVAL OF ITS CLEAN ENERGY FUTURE- )  
ENERGY EFFICIENCY ("CEF-EE") PROGRAM ON A )  
REGULATED BASIS )

DOCKET NO.

EO10121TT3

EO18101113

### 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 intervene with all of those rights and obligations typically afforded to an intervener 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 – Energy Efficiency ("CEF-EE") Program to implement twenty-two sub programs and various pilot programs.<sup>1</sup> Among the pilot programs are PGE&E's proposed "Smart Home Pilot"; "Non-Wires Alternative Pilot"; and "Volt-Var Pilot".<sup>2</sup> The CES-EE Program proposed investment is approximately \$2.8 billion over 6 years.<sup>3</sup>

2. 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

<sup>1</sup> PSE&G Petition for Approval of Clean Energy Future – Energy Efficiency Program On A Regulated Basis (Oct. 11, 2018), Attachment 1 at 1. ("Petition for CEF – EE Program").

<sup>2</sup> PSE&G Clean Energy Future – Energy Efficiency Program Plan ("Energy Efficiency Plan").

<sup>3</sup> Petition for CEF – EE Program at 13.

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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 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.

3. 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).

4. PSE&G's Energy Efficiency Plan proposals include innovative offerings that incorporate residential solar PV and energy storage assets. The outcome of this proceeding therefore directly and substantially impacts the energy storage and renewable energy market in PSE&G's service territory, including the residential solar and energy storage market. 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.

5. Sunrun commends PSE&G's efforts to adopt innovative energy efficiency offerings and in particular the incorporation of residential energy storage and solar PV into its

energy efficiency resource portfolio to support New Jersey's clean energy goals.<sup>4</sup> As the largest residential solar and energy storage provider in the country and operations in PSE&G's service territory, Sunrun has a direct and significant interest in PSE&G's proposed programs and pilots, including the Smart Home, Volt-Var and Non-Wires Alternatives Pilots.

6. For instance, the Smart Home Pilot is intended to allow PSE&G to diverge from typical energy efficiency subprogram implementations and test new and innovative smart home concepts with customers and the emerging network of private sector firms active in this broad space," including residential solar PV and energy storage.

7. The NWA pilot will defer or avoid the need for electric infrastructure upgrades through deployment of EE and demand response resources and the Volt-Var Pilot will use smart grid technology to automate control of the electric power distribution grid to reduce energy consumption, peak demand and facilitate more solar integration.

8. Sunrun offers a solar-plus-storage service ("BrightBox") in several states, providing customers an additional tool to control energy consumption and reduce electricity costs. BrightBox pairs battery storage with solar, a smart inverter, and load management capabilities with connectivity through WiFi or cellular for remote asset monitoring and dispatch. In the event of a power outage, the system safely islands from the grid and powers the home. In an extended outage, solar panels in island mode are capable of powering the home and charging the battery for backup, providing a new form of site-level resiliency not previously available to homeowners. BrightBox capabilities also extend to integrated grid management capabilities, such as those contemplated in PSE&G's pilot programs.

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<sup>4</sup> See, e.g., Energy Efficiency Plan at 74 ("The breadth of smart home devices entering homes is expanding beyond thermostats, smart plugs, and lighting controls to include smart shared controls, appliances, water heaters, as well as connected PV inverters, residential storage

9. As a leader in residential DER deployment, Sunrun has a substantial interest in utility capital investment plans, including the consideration of NWA solutions and other DER based programs, such as the Smart Home and Volt-Var pilots that can be leveraged to reduce costly capital expenditures and thereby benefit all ratepayers. Utility programs that leverage residential solar-plus-storage are crucial components of grid modernization. NWAs that aggregate residential solar plus storage resources can be an effective mechanism for avoiding specific grid infrastructure investments, providing utilities opportunities to reduce costs for customers while advancing clean energy goals. Sunrun's experience as the largest residential solar and energy storage provider in the country can contribute significantly to the development of a full and robust record on the important proposals offered by PSE&G in this proceeding.

10. Sunrun respectfully submits that in this proceeding the Board should also explore opportunities for deploying residential behind-the-meter battery storage through 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 in conjunction with PSE&G's proposed pilot offerings. BYOD tariffs are being developed in New York and New England states to 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, all of which further PSE&G's Energy Efficiency Plan goals.

11. 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  

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batteries, and electric vehicles.").

developer of residential solar and energy storage operating in the 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.

12. 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.

13. 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 expertise and 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.

14. 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.

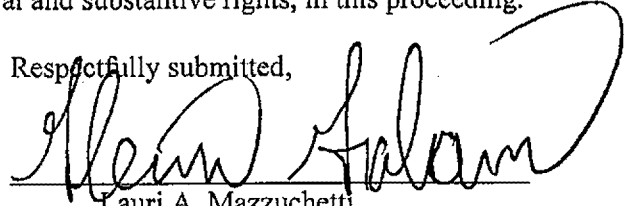
15. All communications and correspondence concerning this proceeding should be directed to:

Lauri A. Mazzuchetti  
Glenn T. Graham  
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[lmazzuchetti@kelleydrye.com](mailto:lmazzuchetti@kelleydrye.com)  
[ggraham@kelleydrye.com](mailto: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", written over a horizontal line.

Lauri A. Mazzuchetti  
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Attorneys for Sunrun, Inc.

Dated: November 16, 2018

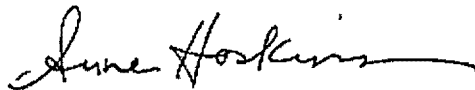
**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

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 )	

**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.



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Anne Hoskins

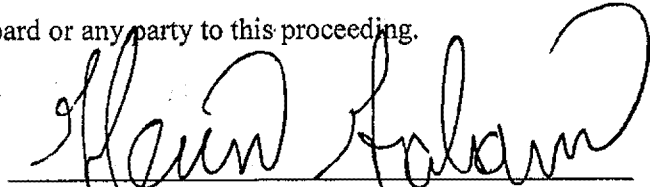
Dated: November 16, 2018

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BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE PETITION OF PUBLIC	)	
SERVICE ELECTRIC & GAS COMPANY FOR	)	DOCKET NO.
APPROVAL OF ITS CLEAN ENERGY FUTURE-	)	EO10121113
ENERGY EFFICIENCY ("CEF-EE") PROGRAM ON A	)	
REGULATED BASIS	)	

**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.



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Dated: November 16, 2018



IN THE MATTER OF THE PETITION OF PUBLIC )  
SERVICE ELECTRIC AND GAS COMPANY FOR )  
APPROVAL OF ITS CLEAN ENERGY FUTURE – )  
ENERGY EFFICIENCY (“CEF-EE”) PROGRAM ON A )  
REGULATED BASIS )  
)

DOCKET NO.  
EO10121113

### 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 EO10121113, 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.

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