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BOARD OF PUBLIC UTILITIES
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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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February 8, 2019

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its
Clean Energy Future-Energy Efficiency Program on a Regulated Basis
BPU Docket No. GO18101112 & EO18101113

VIA E-MAIL AND OVERNIGHT DELIVERY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Fl., Suite 314
P.O. Box 350
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Dear Secretary Camacho-Welch:

In accordance with N.J.A.C. 1:1-14.10(b), Public Service Electric and Gas Company (“PSE&G” or the “Company”) submits this letter in opposition to the February 5, 2019 Motion for Interlocutory Review filed by Sunrun Inc. (“Sunrun”) of Commissioner Dianne Solomon’s January 22, 2019 Order (“January 2019 Order”) denying Sunrun intervenor status in this proceeding, while granting it participant status. PSE&G is enclosing an original and two copies of this letter response. Kindly stamp one of those copies filed and return it in the enclosed, self-addressed envelope. Copies of this filing are being served via overnight or electronic mail on the parties as indicated on the attached service list.

As more fully described below, PSE&G respectfully requests that the Board of Public Utilities (the “BPU” or “Board”) deny Sunrun’s request for interlocutory review. Commissioner Solomon appropriately decided that Sunrun’s interests in this proceeding related to solar energy and energy storage were not substantial enough to warrant full party rights in this energy

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efficiency filing, especially considering the accelerated procedural schedule that governs the case. This decision was far from “irrational”, as Sunrun has described it. Sunrun’s brief in support of its motion for reconsideration, ¶16, page 4. In fact, it was rational and proper, and the Board should not reverse it.

Background

On October 11, 2018, PSE&G filed a Petition seeking approval of the Board to implement its Clean Energy Future – Energy Efficiency Program (the “CEF-EE Program”) pursuant to N.J.S.A. 48:3-98.1(a)(1). The CEF-EE filing is, as its name demonstrates, an energy efficiency filing. It consists of 22 subprograms whereby the Company implements and manages select, highly advanced approaches to energy efficiency. For example, the seven largest CEF-EE subprograms in terms of proposed, estimated expenditures can be summarized as follows:

- Residential Efficient Products: rebates and on-bill repayment for HVAC equipment, smart thermostats, appliances, lighting, and other energy efficient equipment.
- Residential Income Eligible: includes energy audits, installation of efficient equipment, and broader weatherization and appliance replacement services.
- C&I Prescriptive: Rebates and on-bill repayment for HVAC equipment, lighting, motors and drives, refrigeration, water heaters, air compressors, and food service equipment.
- C&I Custom: Custom incentives for large energy efficiency projects.
- C&I Small Non-Residential Efficiency: Rebates and on-bill repayment for small, non-residential customers for direct-installed energy efficiency measures, including lighting, controls, refrigeration, heating and air conditioning upgrades.
- C&I Engineered Solutions: Whole-building engineered energy saving solutions to hospitals, school districts, universities, municipalities, apartment buildings, and other non-profit and public entities.
- C&I Streetlight: Replacement of High Pressure Sodium with Light-Emitting Diode luminaires and a smart cities pilot.

Together, these seven subprograms represent nearly 84 percent of total proposed

subprogram expenditures. Direct Testimony of Karen Reif, Table 1, pages 6-9.

By Order dated October 29, 2018, the Board decided to retain jurisdiction over the CEF-EE filing, designated Commissioner Solomon as the presiding officer, and authorized Commissioner Solomon to rule on all motions that arise during the proceeding. October 29, 2018, Order, page 3. Sunrun filed a motion to intervene on November 16, 2018, which PSE&G opposed on the grounds that Sunrun failed to allege that it “will be substantially, specifically or directly affected” by the outcome of the proceeding. N.J.A.C. 1:1-16.1(a).

On January 22, 2019, Commissioner Solomon issued an Order ruling on the intervention and participation motions the Board received and entering a procedural schedule. January 2019 Order. With respect to Sunrun, Commissioner Solomon noted its “direct and significant” interest in the proceeding “that is different from that of other parties.” *Id.* at page 17. Commissioner Solomon further stated that Sunrun “seeks to offer its own specific perspective, which could add to the development of the record in this matter.” *Id.* However, after weighing these factors with the Board’s “need to meet its statutory obligations in a timely manner”, Commissioner Solomon appropriately concluded that “Sunrun has not made a showing that its interest in this matter warrants granting its motion to intervene, given the need for prompt and expeditious administrative proceedings.” *Id.* Commissioner Solomon did find that Sunrun had a “significant” enough interest in this proceeding to warrant participation status. *Id.*

The January 2019 Order also approved a procedural schedule, which calls for evidentiary hearings to conclude less than three months from the date of this submission (*i.e.*, by May 2, 2019). In light of the 180-day period for the Board to review utilities’ energy efficiency filings such as the instant proceeding, the BPU must rule on the merits of this proceeding no later than early July 2019, a mere five months from the date of this submission. N.J.S.A. 48:3-98.1(b).

On January 29, 2019, Sunrun filed a motion for reconsideration of Commissioner Solomon's order denying it intervenor status. On February 5, 2019, Sunrun re-filed its motion, re-classifying it as a motion for interlocutory review of Commissioner's Solomon's order. For the reasons set forth below, the motion for interlocutory review should be denied.

Commissioner Solomon Appropriately Denied Intervenor Status to Sunrun

Rule 1:1-16.1(a) states that any "person or entity not initially a party, who has a statutory right to intervene or who will be substantially, specifically and directly affected by the outcome of a contested case, may on motion, seek leave to intervene."¹ Rule 1:1-16.3(a) provides that the following factors shall be considered when ruling upon a motion to intervene:

- (i) the nature and extent of the movant's interests in the outcome of the case;
- (ii) whether or not the movant's interest is sufficiently different than that of any party so as to add measurably and constructively to the scope of the case;
- (iii) the prospect of confusion or undue delay arising from movant's inclusion; and
- (iv) other appropriate matters.

Rule 1:1-16.5 states: "Every motion for leave to intervene shall be treated, in the alternative, as a motion for permission to participate." A person or entity "with a significant interest in the outcome of a case may move for permission to participate." N.J.A.C. 1:1-16.6(a). Thus, a party can have a "significant interest" in the outcome of a proceeding, and still be granted participant rather than intervenor status if, as is the case here, the factors for intervention set forth in N.J.A.C. 1:1-16.3(a) weigh against full party rights.

Commissioner Solomon's Order appropriately balanced the intervenor criteria and reached the proper conclusion that Sunrun instead should be granted participant status. The

¹ Sunrun was not initially a party to this proceeding, nor does it have a statutory right to intervene in it.

January 2019 Order correctly outlines the standard of review in ruling on a motion to intervene. January 2019 Order, page 13. For Sunrun, like other parties denied intervention,² Commissioner Solomon noted their “significant” interest in the proceeding, but found that interest not to be substantial enough to warrant intervention given the accelerated time period for the Board to rule on the CEF-EE Program. *Id.* at page 17.

Commissioner Solomon’s conclusion was proper given that Sunrun, according to its motion, is a “residential solar and energy storage provider[.]” Sunrun’s brief, ¶18, page 4. However, the CEF-EE filing is, to an overwhelming extent, an energy efficiency filing, and it must conclude within five months of the date of this submission.³ Thus, Commissioner Solomon appropriately found that Sunrun “has not made a showing that its interest in this matter warrants granting its motion to intervene, given the need for prompt and expeditious administrative proceedings.” January 2019 Order, page 17.

Not only was Commissioner Solomon’s decision proper, but it was also consistent with very recent Board precedent. Specifically, in *I/M/O the Implementation of L. 2018, c. 16 Regarding the Establishment of a Zero Emission Certificate Program for Nuclear Power Plants* (the “ZEC Proceeding”),⁴ the PJM Power Provider Group (“P3”), which describes itself as a non-profit organization consisting of power providers that promote competitive wholesale electricity markets, moved to intervene on the basis that the Board’s awarding of ZECs would

² Commission Solomon found the following seven entities that moved to intervene had a “significant” interest in the CEF-EE but, like Sunrun, granted them participant status: New Jersey Natural Gas Company, Tendril, Direct Energy, NRG, Just Energy, Enel X, and MaGrann Associates. January 2019 Order, pages 14-16.

³ To be sure, a few of the pilots in the CEF-EE proposal, including the Volt Var, Non-Wires Alternative, and Smart Homes pilots, make reference to solar or energy storage. *See generally* Schedule KR-CEF-EE-2. However, the energy storage and solar energy components of these pilots represent a small portion of the pilot subprogram design, and they are an even smaller portion when compared to the entire CEF-EE program.

⁴ BPU Docket No. EO18080899.

have direct economic consequences for its members. November 19, 2018 Order on Motions to Intervene or Participate and for Admission *Pro Hac Vice*, page 6. The Board declined to grant P3 intervenor status despite “acknowledge[ing] that the outcome of the proceeding will have direct economic consequences for P3 and its members based on impacts on competition and rates in wholesale electricity markets,” and noting that P3 could contribute to the development of the record and assist the Board in reaching a determination. November 19, 2018 Order, page 11. Weighing against P3’s significant economic interest in the ZEC proceeding and its ability to assist the BPU was the Board’s consideration, equally compelling in this case, of the “need for prompt and expeditious administrative proceedings.” *Id.* Pursuant to the ZEC law, the BPU only has five months from the date it established a ZEC program (November 19, 2018) to determine which plants are eligible to receive ZECs (by April 18, 2019). N.J.S.A. 48:3-87.5(b) and (d). Given, *inter alia*, the Board’s desire for “prompt and expeditious administrative proceedings”, it denied P3’s request for intervention, granting it participant status instead despite its “significant interest” in the proceeding. November 19, 2018 Order, page 11. P3 filed an appeal with the New Jersey Superior Court, Appellate Division seeking emergent relief from the Board’s November 19, 2018 Order, which the Appellate Division denied. See Exhibit A.

Similarly, in *I/M/O the Petition of Public Service Electric and Gas Company for Approval of the Energy Strong Program* (“Energy Strong”),⁵ then-Commissioner Fiordaliso denied intervenor status to the Sierra Club and the New Jersey Environmental Federation, even while finding that they could provide a prospective on the filing that was different from other parties. September 18, 2013 Order on Interlocutory Appeal, BPU Docket Nos. EO13020155 and GO13020156, page 2. The environmental entities sought an interlocutory review of that

⁵ BPU Docket Nos. EO13020155 and GO13020156.

decision, which the Board decided to hear while ultimately affirming the decision to deny them intervenor status. Of relevance to this proceeding, the Board made the following finding:

As Commissioner Fiordaliso noted, the need and desire for the development of a full and complete record must be weighed against the need for prompt and expeditious administrative proceedings While the Board is concerned with ensuring that any infrastructure upgrades proposed are efficient and cost effective, it is also concerned with ensuring that upgrades found to satisfy those criteria are done within a reasonable period of time.

The same result should apply here. Like P3 in the ZEC Proceeding, Sunrun was found to have a “significant” economic interest in this proceeding that is tied to competition; however, that interest was not substantial enough to warrant intervention considering the Board must resolve this RGGI filing in an expedited manner. Similarly, like the environmental entities in the Energy Strong proceeding, Sunrun was found to have an interest in this proceeding that “is different from that of other parties.” January 2019 Order, page 17. However, just like those environmental entities, Sunrun’s “different” interest was insufficient to warrant intervenor status given the need for a prompt and expeditious resolution of this filing. Sunrun’s motion should be denied.

Lastly, as noted above, CEF-EE is an energy efficiency filing at its core (and beyond). It would be an incongruous result for the Board to reverse Commissioner Solomon’s Order and permit a solar and energy storage company full party rights, when multiple entities in the energy efficiency market were denied intervenor status.⁶ The Board should not overturn Commissioner Solomon’s Order.

⁶ These entities include Tendril, Enel X, and MaGrann Associates.

None of Sunrun's Arguments Warrant the Reversal of Commissioner Solomon's Order

Sunrun fails to demonstrate that the Board should take the unusual step of reversing a Commissioner's Order and granting them intervenor status. Sunrun asserts that Commissioner Solomon's findings that its interests in this proceeding "are significant and different from those of other parties", and that it could contribute to "the development of the record", conclusively determinate that it should have been granted intervenor status. Sunrun brief, ¶26, page 13. This is incorrect. Commissioner Solomon expressly weighed these findings against the need for the Board "to meet its statutory obligations in a timely manner." January 22, 2019 Order, page 17. As was the case in the ZEC and Energy Strong proceedings discussed above, the need for prompt and expeditious administrative proceedings was a proper factor for the Commissioner to consider when assessing the intervenor motions given the accelerated procedural schedule. At a minimum, Commissioner Solomon's logical reliance on the expedited procedural schedule in this RGGI filing constitutes "other appropriate matters" that are relevant when assessing an intervenor motion. N.J.A.C. 1:1-16.3(a).

The simple fact is that Commissioner Solomon appropriately weighed a factor other than those on which Sunrun relies in support of its request for interlocutory review. That balancing, Commissioner Solomon appropriately found, weighed against Sunrun -- a solar energy and energy storage company -- having full party rights in this energy efficiency filing that must be resolved in five months from the date of this submission. The Board should not overrule the Commissioner's balancing of the intervenor criteria.

Sunrun also notes its involvement in two out-of-state proceedings as indication that the Board should overturn Commissioner Solomon's decision. Those cases are not instructive. The first, a Public Utilities Commission of New Hampshire proceeding, involved a utility's request

for a battery storage pilot program. *Liberty Utilities (Granite State Electric) Corp. d/b/a Liberties Utilities*, DE 17-189, Order No. 26, 2009 (January 17, 2019). Unlike PSE&G's CEF-EE filing, it was not an energy efficiency proceeding, nor was it required by law to resolve in six months. *Id.* at page 1. Indeed, the New Hampshire utility made its filing on December 1, 2017, and a final order was issued more than a year later on January 17, 2019.⁷ *Id.* Intervention for Sunrun in the New Hampshire proceeding was sensible given that, unlike in this energy efficiency filing, it was limited to battery storage issues on which Sunrun claims to be a leader, and the New Hampshire filing took more than double the amount of time to conclude than permitted by the timetable for resolution applicable to CEF-EE.

The second out-of-state proceeding that Sunrun cites is *In the Matter of PSEG LI Utility 2.0 Long Range Plan*, wherein the New York State Department of Public Service ("NYSDPS") provided recommendations on various PSEG Long Island initiatives, including smart meters, a "Super Savers" program, utility scale energy storage, behind the meter energy storage, and electric vehicles, among others. NYSDPS Matter No. 14-01299 (November 1, 2018). Unlike CEF-EE, the PSEG LI initiatives were not energy efficiency-intensive with tangential aspects of the program touching upon solar energy and energy storage. More importantly, Sunrun did not intervene in that matter; rather, it submitted written comments on PSEG LI's proposals. There is no reason why Sunrun cannot do the same in this CEF-EE proceeding as either a participant, or as a member of the public at one or more of the six public hearings. N.J.A.C. 1:1-16.6(c) (participants may, *inter alia*, file a statement or brief). Granting Sunrun intervenor status is unnecessary for it to meaningfully comment on the few aspects of the CEF-EE filing that touch

⁷ This opinion was issued nearly two months *after* Sunrun moved to intervene, and just five calendar days before Commissioner Solomon issued the January 2019 Order. Thus, it was not described in Sunrun's motion to intervene, nor could it have been the product of any meaningful review by Commissioner Solomon. Thus, it cannot form the basis for reversing the Commissioner's Order.

upon solar energy and energy storage.

Finally, citing the principles of fundamental fairness and due process, Sunrun claims that Commissioner Solomon's Order prevents it from participating in this proceeding in any meaningful way. *See, e.g.*, Sunrun brief, ¶4, page 2 and ¶22, page 12. As noted above, this is simply not true. As participants, Sunrun will be able to conduct oral argument and submit statements and briefs. N.J.A.C. 1:1-16.6(c). They will also have the opportunity to attend any (or all) of the public hearings, and provide a statement on the record at each of them. As a participant, Sunrun will have ample opportunity to express its position regarding the CEF-EE Program, and in a manner that is proportionate to the energy storage and solar energy issues in this energy efficiency filing.⁸

⁸ In the alternative to intervention status, Sunrun asks the Board to allow for a "participant-stakeholder working group process" that would permit participants to "provide input in settlement discussions, including a review of, and opportunity to comment on, a draft settlement agreement. . . ." Sunrun brief, page 14, fn. 23. The Board should decline this request, as it would dilute the distinction between intervenor and participant, go well beyond the rights of a participant set forth in N.J.A.C. 1:1-16.6(c), and cause delay in a proceeding that must resolve in just five months from the date of this submission.

Conclusion

Commissioner Solomon carefully weighed Sunrun's interest in this proceeding against the need for an expeditious and prompt resolution, and ultimately decided that participant status was the more appropriate determination. In reaching this decision, the Commissioner acted reasonably and prudently. The Board should not disturb the Commissioner's ruling. Sunrun's motion for interlocutory review should be denied.

Respectfully submitted,

By:



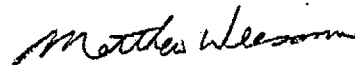
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Dated: February 8, 2019

cc: Service List (via e-mail only)

Certification of Service

I hereby certify that on this date a copy of the foregoing response was served by overnight mail and/or electronic service on all parties as indicated on the attached service list. I further certify that on this date two copies of this opposition has been sent via overnight delivery for filing to the Board of Public Utilities.



Matthew M. Weissman

Dated: February 8, 2019

FILED

DEC 12 2018


 CLERK


Supreme Court of New Jersey
Single-Justice Disposition on Application for Emergent Relief (*Rule 2:9-8*)

Case title: 1/M/O The Implentation of L. 2018, c. 16 Regarding the Establishment of a Zero Emission Certificate Program for Nuclear Power Plants

Supreme Court docket number: (082173)(S-44-18)

Appellate Division docket number (if available): AM-000161-18

Applicant's name: PJM Power Providers Group

The applicant's request for permission to file an emergent motion and any related request for a temporary stay or other relief pending disposition of an emergent motion are DENIED for the following reason(s):

1. The matter does not concern a genuine emergency or otherwise does not warrant adjudication on short notice. The applicant may file a regular motion for review by the Superior Court, Appellate Division in the ordinary course.
2. The Appellate Division has entered an order or judgment, and the matter is not emergent or otherwise does not warrant adjudication on short notice. The applicant may file a regular motion for review by the Supreme Court in the ordinary course.
3. The application concerns an order entered during or on the eve of trial as to which there is no prima facie showing that immediate interlocutory intervention is required. The applicant may file a regular motion in the appropriate court for review in the ordinary course.
4. The applicant must obtain a signed order or disposition from the Appellate Division before requesting relief from the Supreme Court.
5. Other: The applicant does not meet the criteria set forth in Crowe v. DeGioia, 90 N.J. 126 (1982).

Date: 12/12/2018

By: 

Name: Justice Faustino J. Fernandez-Vina

11/21/2018

Public Service Electric and Gas Company
CEF-EE
GO18101112 and EO18101113

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