



**COMMONWEALTH OF PUERTO RICO
PUERTO RICO ENERGY COMMISSION**

IN RE: PUERTO RICO ELECTRIC POWER AUTHORITY RATE REVIEW CASE NO.: CEPR- AP-2015-0001	Subject: Intervention Request (Sunnova Energy Corporation)
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INTERVENTION REQUEST

The following form shall be completed and filed with the intervention request. The petitioner shall provide all the information requested in this form using specific examples when required. In the form section of the Commission's website you shall find a Word format version of this form. The term to file intervention requests will begin on August 1st, 2016 and will end on August 5, 2016.

(1) Provide a narrative with specific examples that show the nature and extent of the petitioner's interest in this proceeding and how such interest is relevant to the specific purposes of this case.

Sunnova Energy Corporation ("Sunnova") has approximately 8,600 clients and 2,700 projects installed and in service throughout Puerto Rico. Any charges proposed to be paid by net metering customers will have an effect on the commercial interests of Sunnova, whether such net metering customers are "grandfathered" by Act 4 of 2016 or not. For more details, see Sunnova's "Motion to Intervene."

(2) In view of a preliminary analysis of the Petition, provide a summary of the position to be promoted by the applicant and its relation to the merits of the case and the content of the request of the Authority.

Based on Sunnova's current review of available documents on record, the Puerto Rico Electric Power Authority's ("PREPA") petition does not adequately address or discuss the impact the approval of new rates would have on net metering customers. In addition, pursuant to applicable law, any charges imposed on net metering customers must be just, and should cover the administrative costs of services provided to such customers, which shall be clearly differentiated from services offered to other customers, and will not be excessive in such a way as to become an obstacle to the deployment of renewable energy projects. Sunnova's review of available documents does not indicate that PREPA has established its burden as regards any proposed charges applicable to net metering customers. Moreover, the record is devoid of any discussion on the benefits DERs afford to PREPA's system and how they should be accounted for and credited with respect to net metering customers. For more details, see Sunnova's "Motion to Intervene."

(3) To the extent it is applicable, detail the petitioner's experience, industry and professional and/or academic qualifications, or of its principal officers.

Sunnova's team is comprised by professionals with extensive experience in the solar industry, in Puerto Rico, throughout the U.S., the U.S. Virgin Islands, Guam, and Saipan. Said experience extends to the installation, financing, maintenance and operation of thousands of customer systems nationwide, including their relationship with the electric utilities at each location where Sunnova does business. For more details, see Sunnova's "Motion to Intervene."

(4) Provide an explanation as to how the intervention of the petitioner, in light of its technical, professional, academic or practical knowledge will contribute information, expertise, specialized knowledge or technical advice that will not be available otherwise in the proceeding.

Sunnova is the largest residential solar company in Puerto Rico. Sunnova's local team can contribute its unique experience and perspective on the Puerto Rico market. In addition, given Sunnova's operations in other jurisdictions, it can share its experience in rate review cases and proceedings in such other

locations. Moreover, Sunnova will offer testimony in support of its position. For more details, see Sunnova's "Motion to Intervene."

(5) Detail the extent of your participation in the proceeding, including, but not limited to, if the petitioner anticipates performing discovery of evidence, present expert testimony in writing, actively participate in the technical hearing and/or file a legal claim.

Sunnova anticipates it will notify interrogatories, document production requests to PREPA, and present expert testimony. Witness information will be timely announced. Also, Sunnova expects to file a brief in addition to participating in hearings.

(6) Provide an explanation of the reasons why intervention in this proceeding is the only appropriate mechanism to protect the applicant's interest.

The captioned proceeding is the proceeding provided for by Act 57-2014 for the approval of new rates proposed by PREPA. That is, the legislation specifically designed the procedure to address changes in electricity rates. Therefore, it is the ideal procedure, if not the only procedure, for Sunnova to protect its interests, which are detailed in its answer to question (1) of this form. For more details, see Sunnova's "Motion to Intervene."

(7) Provide an explanation of the reasons why the intervention of the applicant will not result in repetitive testimony or have the effect of delaying or unreasonably delay the process of the case.

As mentioned, Sunnova's background, both in Puerto Rico and the United States, is rich in experiences and knowledge. Its perspective will be unique and beneficial. Sunnova will also not delay the process because it will timely comply with the case schedule, as it has done in other cases before the Honorable Commission. For more details, see Sunnova's "Motion to Intervene."