

**COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR Received: Jul 26, 2019 3:51 PM
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IN RE:

INTEGRATED RESOURCE PLAN
PUERTO RICO ELECTRIC POWER
AUTHORITY

NO. CEPR-AP-2018-0001

SUBJECT: PETITION TO INTERVENE

PETITION TO INTERVENE

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW Sunrun and respectfully submits the instant Petition to Intervene, as per Section 3.03 of Regulation No. 9021, (“Regulation on Integrated Resource Plan (IRP) for the Puerto Rico Electric Power Authority”) as well as Section 5.05 of Regulation 8543, (“Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Procedures”).

Section 3.03 of Regulation No. 9021 references the following criteria to be considered when evaluating an intervention:

- 1) Whether the petitioner’s interests may be adversely affected by the proceeding;
- 2) Whether there are no other means in law for the petitioner to adequately protect its interest;
- 3) Whether the petitioner’s interest is already adequately represented by the parties to the proceeding;
- 4) Whether the petitioner’s participation can reasonably assist in preparing a more complete record of the procedure;
- 5) Whether the petitioner’s participation may extend or excessively delay the procedure;

- 6) Whether the petitioner represents or is a spokesperson for other groups or entities of the community; and,
- 7) Whether the petitioner may provide information, expertise, or technical advice that would not otherwise be available in the proceeding.

Each criterion is discussed as established in the cited statute, although criteria three and six, as well as four and seven shall be discussed jointly:

I. Sunrun's interests could be adversely affected by the proceeding.

As the leading residential solar, storage, and distributed energy services company in the United States with over 240,000 customers in 22 states, the District of Columbia, and Puerto Rico, Sunrun is committed to ensuring that all customers have a viable choice in how they procure and how they consume electricity. Sunrun pioneered the “*solar-as-a-service*” model more than a decade ago and today is the largest dedicated residential solar, storage, and distributed energy services company in the country. Sunrun has been, is and will continue being directly involved in Puerto Rico’s solar industry and clean energy future. Sunrun is also active in our markets states to achieve these policy objectives, and expert engagement in processes such as the this IRP is crucial. Our business creates local employment opportunities through solar and solar paired with battery storage installations and we continually seek opportunities to advance clean energy goals and deliver innovative solutions to customer and grid needs.

In the aftermath of Hurricane María, Sunrun saw firsthand the suffering and destruction caused by power outages and a fragile, obsolete energy system. Sunrun was one of the first stateside solar companies with boots on the ground, partnering with Empowered By Light and leading Puerto Rico construction firm Aireko, to donate and install Sunrun solar and battery

systems at fire stations in Puerto Rico. Without power, these first responders would not have been able to operate, let alone provide emergency services to help their communities. Since their installation, our solar and battery systems have run 24/7 on these fire stations. Throughout the longest blackout in U.S. history, the firefighters were able to respond to emergencies and offer vital support to their surrounding communities. Sunrun then commercially entered the market last summer, in partnership with local solar and storage companies Maximo, Windmar, and New Energy and we are already deploying our residential solar plus storage systems, growing local jobs, and helping to rebuild the grid one home at a time.

Puerto Rico is ideally suited for solar energy, but the best policies and plans must be set forth and enforced to achieve these ends, and engagement in this IRP is crucial. Puerto Rico's mountainous geography and extreme weather make traditional delivery of electricity -- via centralized generation and bulky power lines -- vulnerable to damage and expensive to build. As an island with limited land available, and with ample local energy sources like the sun, deployment of distributed solar and storage is imperative: rooftop solar uses existing infrastructure, fuel cost procurement is zero, general system costs are low and decreasing. Maintenance cost is nearly non-existent. And as the electricity grid modernizes, distributed energy resources, such as home batteries, together with new digital technologies, will create a more responsive, efficient and resilient energy system designed around consumers and their needs. The energy stored in home batteries can also be aggregated and deployed during peak demand or outages creating a more resilient overall energy system, as well as delivering individual home backup power. Sunrun, and our local partner companies are building the grid of the future every day.

Sunrun forms long-term partnerships with our customers, ensuring their solar and battery systems perform as guaranteed during the life of a typical 20 to 25-year solar-as-a-service agreement. We can also partner with utilities to enable these assets to respond to grid needs for the duration of this multi-decade customer relationship. Grids should be planned from the customer's point of view, and policy should be conducted the same way, with a distributed, energy first, customer-centric point of view. The IRP must reflect these truths. An IRP that is agnostic or antagonistic to these principles would directly harm the distributed energy industry, which is a corollary of its vision for the future of energy in Puerto Rico, the rest of the United States, and the world.

II. No other means in law to adequately protect Sunrun's interests.

There is no other process or legal opportunity under Puerto Rico statutes available for Sunrun to achieve exactly what this IRP is meant to achieve. Under Act 57/2014, as amended, as well as related regulations, the IRP is the process to ensure a well-planned development of Puerto Rico's electric power system. Particularly, the IRP must take into account the reasonable resources required to satisfy the demand for electric power services during a twenty (20)-year period, and it is fundamental that said planning focuses on local resources such as solar power, including distributed scales as well as storage, regardless of whether in front or behind the meter. As intervenor, Sunrun shall be able to aid this planning process in regards to generation, demand and efficiency resources, as well as optimization of distribution facilities, among others, to facilitate the best forward looking paradigms and practices for Puerto Rico's energy ecosystem.

III. No other party can represent Sunrun’s unique interests adequately; Sunrun is not a spokesperson for any other entity, although it does generally espouse policies that benefit solar plus storage consumers and society as a whole.

No other party can adequately represent Sunrun’s particular interests. For example, in other markets Sunrun has proven the concept that it is economically efficient and technically feasible to integrate diverse resources into common operational assets for managing load, reducing system peaks, and building resiliency at the local level. Sunrun has proven that by aggregating solar and energy storage assets many services can be provided, including capacity products, voltage support, management of system peaks, leveraging of demand response capabilities and others. No other party can bring this particular expertise to the table and enhance and future-proof the IRP accordingly.

Similarly, Sunrun cannot claim it formally represents other interests in this proceeding. However, Sunrun always stands with the best policies and practices that in our view further the interests of consumers of distributed solar energy plus storage and of society as a whole. Sunrun is truly focused on creating a ‘*planet run by the sun*’: lowering dependence on fossil fuels and improving the human environment, via policies that involve RPS compliance, fair compensation for energy prosumers, net metering, effective tariff structures for storage, well structured incentives and others.

IV. Sunrun’s participation can reasonably assist in preparing a more complete record of the procedure and shall provide information, expertise, or technical advice that would not otherwise be available in the proceeding.

As mentioned in prior sections, Sunrun will advance technical, planning, policy, and legal positions that can assist this Energy Bureau in reviewing PREPA’s IRP, that would otherwise be unavailable. Sunrun will provide expert review of PREPA’s information and analyses to ensure

the IRP is based on the best available information and industry best practices. Sunrun will leverage its experience and resources to validate or question the reasonability of PREPA's assumptions. And Sunrun will provide expert viewpoints and recommendations regarding PREPA's analyses, all with the ultimate end of aiding this Energy Bureau's review of PREPA's proposed IRP. Sunrun's considerable policy and grid services teams, as well as other resources associated with these teams, are committed to engaging in the IRP, as we have in other jurisdictions.

V. Sunrun's participation shall not extend nor excessively delay the procedure.

Sunrun will strictly abide to all PREB calendars and schedules in this IRP Proceeding and as Intervenor, expects a procedure that is effective and procedurally economical, with full knowledge that this Honorable Energy Bureau will carry it out as such. As this Energy Bureau's review of the IRP is commencing, Sunrun shall be fully able to present its comments within the established schedules and timelines.

WHEREFORE, Sunrun respectfully requests that the Energy Bureau grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, JULY, 26TH, 2019.

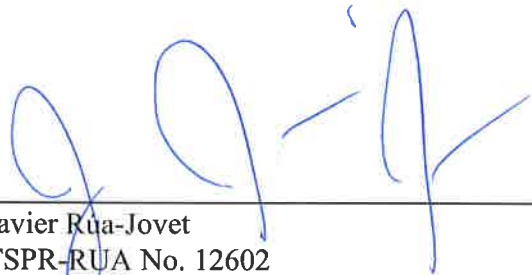
SUNRUN



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FILING AND SERVICE CERTIFICATION

I hereby certify that on July 26th, 2019, I have sent the above Petition to Intervene electronically to the Puerto Rico Energy Bureau via <https://radicacion.energia.pr.gov>. A copy of this Petition has been also notified by e-mail to the Clerk of the Energy Bureau at secretaria@energia.pr.gov and wcordero@energia.pr.gov, the Bureau's Office of Legal Affairs to legal@energia.pr.gov and sugarte@energia.pr.gov and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez (n-vazquez@acepr.com); Astrid I. Rodríguez Cruz (astrid.rodriguez@prepa.com); and Jorge R. Ruíz Pabón (jorge.ruiz@prepa.com).



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