

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

IN RE: REQUEST FOR CERTIFICATION
SUNRUN, INC.

CASE NO.: NEPR-CT-2019-0002

SUBJECT: Motion in Compliance with Resolution Dated June 30, 2021, and Request for Confidential Treatment; Certification as Electric Service Company.

RESOLUTION

I. Introduction

On June 30, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution ("June 30 Resolution") whereby it determined that the Request¹ filed by Sunrun, Inc. ("Sunrun"), as further supplemented², was incomplete. The Energy Bureau granted Sunrun a term of twenty (20) days to submit the following information:

1. A description of Sunrun's corporate structure that includes: (i) an explanation of the relationship between Sunrun and the Related Entities, specifying which are subsidiaries and which are affiliates; (ii) the relationship that Sunrun has with each of the Related Entities; (iii) the relationships among the Related Entities; and (iv) a corporate entity relationship diagram that depicts the relationships between Sunrun and the Related Entities.
2. Regarding the services to be provided, describe: (i) the services that Sunrun will provide in Puerto Rico; (ii) the services that the Related Entities will provide in Puerto Rico; (iii) the services that Sunrun will provide to each of the Related Entities; (iv) the services that each of the Related Entities will provide to Sunrun; (v) the services that each of the Related Entities will provide on behalf of, or as an agent of, or as a representative of, Sunrun; and (vi) the services that each of the Related Entities will provide any other of the Related Entities;
3. A description of the role that Sunrun, and of each of the Related Entities, will have when tending to Puerto Rico clients and potential clients, in the evaluation, negotiation, contract, installation and operation stages. Include in such

¹ See Letter, Request for Certification as Electric Service Providers and corresponding annexes, Case No. NEPR-CT-2019-0002, August 23, 2019.

² See *Motion in Compliance with Resolution Dated May 6, 2020*, Case No. NEPR-CT-2019-0002, July 6, 2020.



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description the interaction of Sunrun with the Related Entities, and the interaction among the Related Entities, during each stage.

4. Describe the economic relationship between Sunrun, the Related Entities, and Sunrun's clients. Such description must include all costs, rates and charges related to the sale of electricity or electric services that Sunrun will provide in Puerto Rico. This must specifically describe the type of electric services provided by Sunrun and the Related Entities as they relate to such costs, rates, and charges.

On July 14, 2021, Sunrun filed before the Energy Bureau a document titled *Request for Extension to Comply with Resolution Dated June 30, 2021* ("Request for Extension"). Through its Request for Extension, Sunrun requested a thirty (30) day extension to comply with the June 30 Resolution. Sunrun stated that the petition was not done in bad faith and will provide the Energy Bureau the requested information.

On August 13, 2021, Sunrun filed before the Energy Bureau a document titled *Motion in Compliance with Resolution Dated June 30, 2021 and to Request Confidential Treatment* ("August 13 Motion"). In compliance with the June 30 Resolution, Sunrun submitted documents and information included in a confidential annex, for which it requested confidential designation and treatment.

II. August 13 Motion in Compliance

Through the August 13 Motion, Sunrun provided information responsive to the June 30 Resolution. Sunrun provided a description of its corporate structure and an explanation of the relationship between Sunrun and the Related Entities. Sunrun provided an explanation of the relationship between Sunrun and its customers and a description of the provision of services by Sunrun to its customers.

Also, as part of the August 13 Motion, Sunrun included a detailed explanation and description of the costs, rates and charges related to electric services that Sunrun will provide in Puerto Rico.

Upon review of the August 13 Motion and the documents in the administrative file of this case, the Energy Bureau **CERTIFIES** Sunrun as an Electric Service Company under Regulation 8701.

III. Request for Confidential Designation and Treatment

Act 57-2014 establishes that any person having the obligation to submit information to the Energy Bureau, can request privilege or confidential treatment to any information that the party submitting understands deserves such protection.³ Specifically, Act 57-2014 requires the Energy Bureau to treat as confidential the submitted information provided that

³ Section 6.15 of Act 57-2014, known as the *Puerto Rico Transformation and RELIEF Act*, as amended.



“the Energy Bureau, after the appropriate evaluation, believes such information should be protected”.⁴ In such case, the Energy Bureau “shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.”⁵

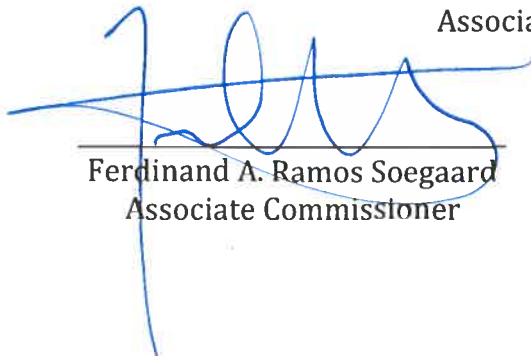
Sunrun requested the Energy Bureau to grant confidential treatment and designation to the Annex included with the August 13 Motion. Sunrun argues that the information contained in the Annex is commercially sensitive and/or confidential information. Sunrun states that the Annex details information on its corporate structure, business dealings and financing aspects of the company. Further, Sunrun contends that said information is generally not available to the public, and its disclosure would place Sunrun at a competitive disadvantage with respect to market participants and cause it economic harm.

Upon examining Sunrun’s arguments, the Energy Bureau **GRANTS** confidential designation and treatment to the Annex included with the Motion in Compliance and Requesting Confidentiality, under Article 6.15 of Act 57-2014.

Be it notified and published.



Lillian Mateo Santos
Associate Commissioner



Ferdinand A. Ramos Soegaard
Associate Commissioner



Sylvia B. Ugarte Araujo
Associate Commissioner



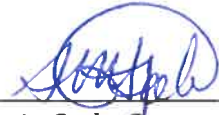
⁴ *Id.*

⁵ *Id.*

CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on October 7, 2021. Chairman Edison Avilés Deliz and Associate Commissioner Ángel R. Rivera de la Cruz did not intervene. I also certify that on October 7, 2021 a copy of this Resolution was notified by electronic mail to ivc@mcvpr.com. I also certify that today, October 7, 2021, I have proceeded with the filing of the Resolution issued by the Puerto Rico Energy Bureau.

For the record, I sign this in San Juan, Puerto Rico, today October 7, 2021.



Sonia Seda Gaztambide
Clerk

