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**Counsel for Sunrun, Inc.**

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Investigation of the  
Costs and Benefits of Pacificorp's Net  
Metering Program

**Docket No. 14-035-114**

**PETITION TO INTERVENE OF  
SUNRUN, INC.**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Sunrun, Inc. ("Sunrun") hereby petitions to intervene in the above-captioned proceeding before the Public Service Commission of Utah ("Commission"). In support, Sunrun states as follows:

1. On November 9, 2016, Rocky Mountain Power ("Company") submitted a "Compliance Filing" in Docket No. 14-035-114 proposing specific rate structure changes to its currently effective net metering tariffs and submitted Advice No. 16-13 in the above-captioned docket. Advice No. 16-13 proposes to close Schedule 135 and open new, transitional Schedule 135-A for net metering customers that apply after December

9, 2016. The Commission issued an order suspending Advice No. 16-13 on December 9, 2016.

2. On November 18, 2016, the Commission issued the *Scheduling Order and Notices of Hearing and Public Witness Hearing* (“Scheduling Order”) and set a deadline of December 20, 2016 for petitions for intervention by parties that wish to participate in the phase of this proceeding that will address the Company’s Compliance Filing and “potentially dispositive legal issues” related to that filing. *Scheduling Order* at p. 2.

3. Sunrun is the nation’s largest dedicated residential rooftop solar company. The Company designs, installs, monitors and maintains solar panels on homeowner rooftops. Sunrun is committed to ensuring that all utility customers have a viable choice in how they consume electricity. Sunrun has an interest in ensuring that rooftop solar is deployed efficiently and economically and that utility rate design is fair, clear, and transparent so as not to discriminate against any particular class of customers or customers who install rooftop solar.

4. Sunrun is a member of The Alliance for Solar Choice (“TASC”), which participated in Docket Nos. 13-035-184 and 14-035-114. Several previous members of TASC are now represented by the Energy Freedom Coalition of America (“EFCA”), which is separately seeking intervention.<sup>1</sup> Sunrun is not a member of EFCA and seeks independent party status through this petition. TASC intends to withdraw from this proceeding if Sunrun is granted intervention..

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<sup>1</sup> EFCA represents a broad range of businesses that include SolarCity Corporation, Silevo, LLC, Zep Solar, LLC, Go Solar, LLC, 1 Sun Solar Electric, LLC, and Ecological Energy Systems. EFCA filed a petition to intervene on December 14, 2016.

5. Sunrun has a direct and continuing interest in the Commission's development and implementation of a framework to analyze the net metering program ("analytical framework") pursuant Utah Code Annotated 54-15-105.1. The Company's Compliance Filing asks, in part, that the Commission apply the cost-benefit framework adopted by its November 8, 2015 Order in this proceeding. Sunrun has a direct interest in participating in this proceeding to ensure that the framework is applied appropriately.

6. Sunrun also has a direct interest in the Commission's eventual application of the analytical framework. The Commission is likely to use the framework to determine whether future net metering rate proposals are just and reasonable. Any rate design approved in this proceeding will have a substantial impact on the ability of providers of solar services to effectively operate in Utah. Sunrun's national perspective addressing matters of rate design for net metering customers will help contribute to a robust record in this proceeding.

7. Sunrun seeks to intervene, in part, to seek the dismissal of the Company's compliance filing upon legal grounds that it is improper for the Commission to consider the rate proposal for net metering customers outside of a general rate case. To this end, Sunrun believes that its participation could contribute to the efficient disposition of this case, saving the Commission and other interested parties time and resources.

8. Sunrun's interests in the outcome of these proceedings will not be adequately represented by any other party. Sunrun's participation will not delay the conduct of this proceeding. Sunrun's Petition to Intervene is timely filed. Sunrun's participation will promote the public's interest in a robust market for residential customer-sited solar energy in the state of Utah. Sunrun intends to work closely with

other parties with related interests to avoid duplication of effort and to advance efficient administration of this proceeding, but seeks independent party status to protect its specific interests.

9. Sunrun requests that all communications regarding this matter to be directed, via electronic mail, to the following persons<sup>2</sup>:

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For these reasons, Sunrun respectfully requests that the Commission grant its Petition to Intervene and permit Sunrun to participate in this proceeding as a party with all of the rights attached thereto.

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<sup>2</sup> Mr. Culley, Mr. Van Nostrand, and Mr. Plenk intend to appear as joint counsel in this proceeding for Sunrun and EFCA.

Respectfully submitted on this 20<sup>th</sup> Day of December, 2016.

/s/

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## CERTIFICATE OF SERVICE

I hereby certify that I will cause a true and correct copy of the foregoing **PETITION TO INTERVENE OF SUNRUN, INC.** to be dispatched via overnight delivery to be filed with the Utah Public Service Commission on December 20, 2016 and to be served via email on that day upon the following persons:

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Dated December 19, 2016 at Cary, NC.

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Blake Elder