

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Application of Pacific Gas and Electric  
Company (U39E) for Approval of Demand  
Response Programs, Pilots and Budgets for  
Program Years 2018 – 2022.

Application 17-01-012  
(Filed January 17, 2017)

And Related Matters.

Application 17-01-018  
Application 17-01-019

**MOTION OF SUNRUN INC. FOR PARTY STATUS**

January 11, 2019

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Counsel to Sunrun Inc.

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**MOTION OF SUNRUN INC. FOR PARTY STATUS**

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Sunrun Inc. (“Sunrun”) respectfully moves for party status in the above captioned consolidated proceeding.

**I. Description of Sunrun**

Sunrun is the largest dedicated residential rooftop solar company in the United States. Since establishing the “solar as a service” model in 2007, Sunrun continues to lead the industry in providing clean energy to homeowners with little to no upfront cost. Sunrun designs, installs, finances, insures, monitors and maintains the solar panels on a homeowner’s roof, while families receive predictable pricing for 20 years or more. Sunrun’s BrightBox energy storage solution combines the company’s solar power generation with smart inverter technology and home battery storage to provide California ratepayers with valuable grid services day and night. Sunrun is headquartered in San Francisco, California and has more than 1,700 California employees based at 21 facilities around the state.

## **II. Statement of Interests Pertinent to the Issues Presented**

As a residential solar company offering solar-paired energy storage through its BrightBox product with the scale and dedication to providing grid services through customer aggregation, Sunrun has a direct interest in proceedings that will create or influence mechanisms for integrating distributed energy resources (“DERs”), including solar-paired energy storage, into the grid. The issues being addressed in this proceeding deal with Demand Response (“DR”) programs, including the Demand Response Auction Mechanism (“DRAM”) pilot program, dual participation rules, and other program rule adjustments that will impact the effectiveness of Sunrun’s efforts to provide grid services. Sunrun currently participates in the DRAM program. Building on its experience in DRAM and in other efforts to provide grid services using DERs in California and across the country, Sunrun hopes to improve and expand DRAM and other DR opportunities for behind-the-meter energy storage resources, particularly for those serving the residential segment. Accordingly, Sunrun has a direct and tangible financial interest in the outcome of this proceeding, which will affect the improvement, expansion, and continuation of the DRAM program.

For all of the above reasons, we respectfully request that Sunrun be granted party status in this proceeding.

## **III. Factual and Legal Contentions Sunrun Intends to Make in this Proceeding**

Sunrun intends to make the following factual and legal contentions, among others, as necessary, over the course of its involvement in this proceeding:

- (a) Sunrun will argue that the DRAM pilot provides value to the grid and should be extended, but with certain changes that Sunrun will recommend designed to improve

program effectiveness, enhance benefits to participating customers, and increase the program's value to all ratepayers and the grid.

- (b) Sunrun will propose modifications that draw from successful programs in other parts of the country that are necessary to scale participation, serve an increasingly fragmented retail landscape, and optimally capture the multi-use attribute opportunity of customer-sited storage.
- (c) Sunrun will highlight the particular challenges and opportunities for aggregators of residential solar and storage systems and will recommend that the Commission address these challenges and opportunities in order to expand the value that all grid customers can realize from DERs.

In the Scoping Memo, the assigned Commissioner and Administrative Law Judges found that this proceeding would address whether the utilities DR programs are consistent with prior Commission decisions and rulings, as well as whether the utilities' and other parties' proposed changes to the DR programs and activities were reasonable and should be adopted.<sup>1</sup> The above factual and legal contentions that Sunrun intends to make are pertinent to these issues because each contention addresses either the reasonableness of the DRAM program, the DRAM program's approval, or both. Finally, because Sunrun accepts the record of this proceeding to date, its participation will not broaden the scope of or cause undue delay to this proceeding.

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<sup>1</sup> Scoping Memo and Joint Ruling of Assigned Commissioner and Administrative Law Judges, p. 3.

#### **IV. Communications**

Sunrun consents to “email only” service and requests that the following individual be added to the service list for A.17-01-012 on behalf of Sunrun:

**(Party Representative)**

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#### **V. Conclusion**

For the foregoing reasons, Sunrun respectfully requests the Commission grant its motion for party status.

Respectfully submitted,



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