

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



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Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007
(Filed October 25, 2018)

MOTION OF SUNRUN INC. FOR PARTY STATUS

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January 10, 2019

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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 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 has nearly 150,000 customers nationwide, with more than half of that number located in California. 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. Starting in Hawaii, and now in California, the company has sold over 2,000 of these advanced systems. 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

This proceeding was initiated to implement the provisions of Senate Bill (“SB”) 901 related to electric utility wildfire mitigation plans.¹ In its December 7, 2018 Scoping Memo, the Commission defined the scope of this proceeding to include (1) the items listed in Pub. Util. Code Section 8386, as established by SB 901, that must be included in the wildfire mitigation plans; (2) whether additional elements beyond those required by statute should be included in the wildfire mitigation plans; (3) how to interpret and apply the statute’s list of required plan elements; (4) the meaning of the provisions listed in the statute for inclusion in the wildfire mitigation plans; (5) other provisions of SB 901 that may affect the Commission’s consideration, interpretation, or approval of the wildfire mitigation plans; and (5) the utility practice of proactive de-energization of power lines under high fire-risk conditions.²

Amended Pub. Util. Code Section 8386(c)(6) requires that a wildfire mitigation plan include: “Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.” Perhaps the most effective method of mitigating the impacts of de-energizing portions of the distribution system is to ensure that customers have access to alternative sources of electricity during such de-energization events.

Further, Section 4.C.8 of the large investor-owned utilities’ (“IOU”) joint template discusses Alternative Technologies as a means of system hardening to achieve the highest level of safety, reliability and resiliency, including “the exploration of new technologies that will

¹ *Order Instituting Rulemaking*, R.18-10-007, p. 1 (Oct. 25, 2018).

² *Assigned Commissioner’s Scoping Memo and Ruling*, R.18-10-007 (Dec. 7, 2018), pp. 2-3 (“Scoping Memo”).

reduce the probability of an ignition event and/or reduce public exposure to a hazardous condition during periods of high fire risk by providing better situational awareness, faster isolation, or minimized energy transfer.”³ Similarly, Section 4 (v) of the California Association of Small and Multi-Jurisdictional Utilities’ (“CASMU”) template discusses “plans for ensuring system will achieve the highest level of safety, reliability and resiliency, including preparations for a major event and plans for asset hardening/asset resilience and modernizing infrastructure.”⁴

As a dedicated residential solar company offering solar-paired energy storage through its BrightBox product, Sunrun has a direct interest in both the protocols the utilities must propose in their wildfire mitigation plans to mitigate the impacts of de-energization events, as well as using solar-paired energy storage to reduce the probability and risk of ignition events. Solar-paired energy storage solutions such as BrightBox are capable of providing power to customers during outages, including outages that result from intentional de-energization. By providing on-site customers with electricity, solar-paired energy storage solutions can also reduce the amount of energy that needs to be transferred over power lines during high-risk conditions, thereby reducing the probability of ignition events.

Accordingly, in their wildfire mitigation plans, the utilities should consider the ability of solar-paired energy storage solutions both to help mitigate the impact of de-energization events on customers and to help reduce the probability of ignition events. The Commission should likewise consider these capabilities of solar-paired energy storage solutions in its evaluation of

³ Joint Utilities’ Report on November 27, 2018 Webinar to Discuss Southern California Edison Company (U 388-E), Pacific Gas and Electric Company (U 39-E) and San Diego Gas & Electric Company (U 902-E) Proposed Wildfire Mitigation Plan Outline and Recommendations from Parties, p. A-1.

⁴ Proposed Wildfire Mitigation Plan Template for Bear Valley Electric Service (U 913-E), A Division of Golden State Water Company, Liberty Utilities (CalPeco Electric) LLC (U 933-E), and PacifiCorp (U 901-E), Attachment 1, p. 1.

the utilities' wildfire mitigation plans. The Commission's determination as to whether solar-paired energy storage systems may be considered viable solutions for mitigating the impacts of de-energization events will impact the financial viability of Sunrun's solar, storage, and other products and offerings.

From its position as a leading solar installer and provider of solar-paired storage, Sunrun can offer the Commission an important perspective on how solar-paired storage can provide safe and reliable power to customers during utility outages, including outages that would occur during de-energization events. Sunrun can also offer the Commission an important perspective on how solar-paired storage can reduce the amount of power transferred over lines during high fire-risk conditions by providing electricity to customers on-site.

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) Solar-paired storage systems should be considered viable solutions for mitigating the impacts of de-energization events and should therefore be considered in the utilities' wildfire mitigation plans; and
- b) Solar-paired storage systems should be considered viable solutions for reducing the risk of wildfires by reducing the amount of power transferred over lines during high fire-risk conditions.

These assertions squarely address the issues raised in the scoping memo,⁵ and 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.

⁵ See Scoping Memo at 2-3. See also Section Pub. Util. Code Section 8386(c)(6).

IV. Communications

Sunrun consents to “email only” service and requests that the following individual be added to the service list for A.18-10-007 on behalf of Sunrun:

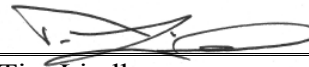
(Party Representative)

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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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