

**KEYES, FOX
& WIEDMAN**
— LLP —

December 4, 2015

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P. O. Box 47250
Olympia, Washington 98504-7250

**RE: *Washington Utilities and Transportation Comm'n v. Puget Sound Energy*
Dockets UE-151871 and UG-151872**

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and twelve copies of *Sunrun, Inc. Petition to Intervene and Notice of Appearance of Joseph Wiedman* and Certificate of Service.

Sincerely,

/s/ Joseph Wiedman

Joseph Wiedman
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Enclosures
cc: Parties w/enc.

**BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION
OF THE STATE OF WASHINGTON**

Re:

Puget Sound Energy, Inc. Electric Tariff
G, Proposed Schedule No. 75: Equipment
Lease Service (WN U-60)

Docket No. UE 151871, and
UG 151872

**SUNRUN, INC. PETITION TO INTERVENE
AND
NOTICE OF APPEARANCE**

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Counsel to Sunrun, Inc.

December 4, 2015

**BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION
OF THE STATE OF WASHINGTON**

Re:

Puget Sound Energy, Inc. Electric Tariff G,
Proposed Schedule No. 75: Equipment
Lease Service (WN U-60)

Docket No. UE-151871, and
UG-151872

SUNRUN, INC. PETITION TO INTERVENE

Pursuant to Rule 480-07-355 of the Procedural Rules of the Washington Utilities and Transportation Commission (Commission), Sunrun, Inc. (Sunrun) respectfully submits, through and by its undersigned counsel, this petition to intervene in the above captioned proceeding.

I. Interest in the Proceeding

1. Sunrun is the largest dedicated residential rooftop solar company in the United States. The company designs, installs, monitors and maintains solar panels on homeowner rooftops. One of Sunrun's subsidiaries, AEE Solar, is a market participant within PSE's service territory, and employs residents of Washington State. Sunrun seeks to expand its operations in the rooftop solar market and is concerned that a decision approving the proposed Equipment Lease Service for distributed energy resources (DER)¹ will encourage anti-competitive behavior by PSE and inhibit the growth of a private marketplace for distributed rooftop solar and other DERs in the state. Such an outcome would have a material and adverse impact on Sunrun's interests and Sunrun is, therefore, opposed to the proposed Schedule.

2. Sunrun has a vested interest in ensuring distributed energy resources, including rooftop solar, are deployed efficiently and economically. Sunrun's proprietary interests in the

outcome of this proceeding will not be adequately represented if it is not granted intervention in the proceeding. Sunrun's admittance as a party will ensure that a full and robust record is developed with regards to utility ownership of DERs, including rooftop solar, and other issues presented by the proposed schedule.

II. Position on the Matters in Controversy

3. The proposed schedule seeks approval of a rate methodology and an Equipment Lease Program through which PSE would offer as rate-regulated products to its customers certain DERs that are currently offered by private, non-rate regulated entities in the competitive market.² Sunrun opposes utility ownership of DERs for the reasons stated herein and therefore opposes PSE's proposal. Sunrun is not opposed to utilities participating in DER markets, but believes utility participation in competitive markets should be limited to utilities' non-rate regulated affiliates. The participation of rate regulated monopoly utilities in competitive markets raises anti-trust concerns and provides utilities unfair competitive advantages over their non-rate regulated private competitors.

4. Sunrun believes the proposed schedule is contrary to law, will threaten private market investment, reduce consumer choice, and is not in the public interest. Sunrun believes that approval of PSE's proposal would provide PSE a Commission-sanctioned competitive advantage over non-rate regulated companies that offer, and seek to offer, DER products. Approving PSE's proposal would negatively impact the pecuniary interests of Sunrun and have a chilling effect on the competitive DER market in Washington. Approval of this proposal would cloak utility ownership of DER with the regulatory imprimatur of a preferred policy choice, and

¹ For the purposes of this Petition to Intervene, Sunrun defines DER to include rooftop solar and other distributed generation, distributed storage, equipment and devices related to end-use energy efficiency, including but not limited to hot water heaters and home appliances, and electric vehicle equipment.

set a dangerous precedent for future proposals for utility ownership of other DERs, such as distributed rooftop solar.

5. Sunrun believes that the Equipment Lease Program would not result in cost-effective service to PSE customers because private companies can and do provide the same or similar service at a lower cost than what PSE would likely be able to provide.³

III. Communications

6. Sunrun consents to “email only” service and requests that the following individuals be added to the service list for UE-151871 and UG-151872 on behalf of Sunrun:

(Party Representative)

Joseph Wiedman
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IV. Conclusion

7. For the foregoing reasons, Sunrun respectfully requests the Commission grant its petition to intervene so that Sunrun may participate with full rights as a party in these dockets.

Respectfully submitted,

/s/ Joseph Wiedman
Joseph Wiedman
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Date: December 4, 2015

Counsel to Sunrun, Inc.

² See Puget Sound Energy Cover Letter for Advice No. 2015-23, Wash. Utilities and Trans. Comm., Sept. 18, 2015.

³ Rev. Code Wash. (ARCW) § 19.285.040 (directing qualifying utilities to pursue conservation that is “cost-effective, reliable, and feasible.”)