

September 10, 2011

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities Commission
Commonwealth Keystone Building 400 North Street, 2nd Floor
PO Box 3265
Harrisburg, PA 17105-3265

RE: **Tentative Order** - Net Metering -Use of Third Party Operators – Dockets No. M-2011-2249441
– Comments of SunRun Inc

Dear Secretary Chiavetta,

Please find enclosed (1) original and (3) copies of comments from SunRun Inc., on the Tentative Order Net-Metering – Use of Third Party Operators – Docket No. M-2011-2249441. If you have any questions regarding these comments, please do not hesitate to contact me at the address below.

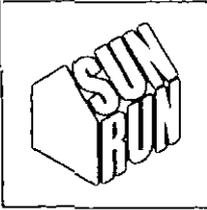
Sincerely,

A handwritten signature in black ink, appearing to read "E. Dube". The signature is fluid and cursive.

Evan Dube
Director of Government Affairs – East Coast Region
SunRun, Inc.
45 Fremont Street, 32nd Floor
San Francisco, CA 94105

Enclosure

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Pennsylvania Public Utilities Commission

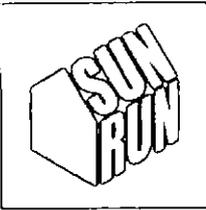
Tentative Order - Net Metering –Use of Third Party Operators: Docket No. M-2011-2249441

Comments of SunRun, Inc.

SunRun is a leading provider of residential solar services, with more than 12,000 customers across 9 states including Pennsylvania. SunRun partners with 4 local installers in Pennsylvania who sell and install SunRun owned systems. SunRun would like to thank the Commission for taking up this Tentative Order to clarify that ratepayers who partner with a third party solar provider to install a renewable generation system at their home or business are able to benefit from Pennsylvania's net metering law.

By interpreting the term "operator" to include "customer-generators with distributed alternative energy systems that contract with a third party to perform the operational functions of the system," (Tentative Order pp. 1) the Commission is taking action commensurate with Pennsylvania's alternative energy goals, while ensuring that the ratepayers of Pennsylvania have access to all available options for procuring solar power. This clarifying language is an effective and equitable resolution to the unintended ambiguity of net metering eligibility for third party solar customers in Pennsylvania. As indicated in the Tentative Order, third party owned solar systems allow customers access to solar power, where the initial capital investment would otherwise be a disincentive.

The Tentative Order includes limiting language for the purposes of determining net metering eligibility, whereby the size of the system shall be no greater than 110 percent of the relevant electricity usage. SunRun understands the purpose of the 110 percent cap to restrict eligibility to customer-generators, in accordance with statutory intent. SunRun believes that this is a reasonable proposal, and SunRun does not oppose the inclusion on this language in the Tentative Order. However, SunRun does recommend that the Commission allow for alternative means of determining the customer-generator's electrical use, in circumstances where evidence of prior



usage is not available. For instance, in the circumstances of new construction, or the transfer of property, it may be necessary to allow for an alternative means of determining the appropriate system size, in accordance with the Tentative Order. One possible alternative for determining electrical use would be for the Commission to allow for an estimation of likely use, based on a formula that takes into account the square footage of the property and the number of members of the household. In addition, an estimate based on available information on the usage of neighboring properties similarly situated, could provide a viable method for determining the appropriate system size in accordance with the 110 percent cap, for properties that cannot produce evidence indicating prior usage.

SunRun thanks the Commission for the opportunity to comment on this Tentative Order, clarifying net metering eligibility relative to the use of third party providers. This clarification is an important step in Pennsylvania's continued pursuit of greater reliance on alternative energy sources, such as solar photovoltaics. SunRun appreciates the Commission's consideration of these comments.

A handwritten signature in black ink, appearing to read "E Dube". The signature is fluid and cursive, written over the printed name.

Respectfully Submitted,

Evan Dube
Director of Government Affairs – East Coast Region
SunRun, Inc.
45 Fremont Street, 32nd Floor
San Francisco, CA 94105