

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF KINGSPORT POWER)
COMPANY d/b/a AEP APPALACHIAN)
POWER GENERAL RATE CASE) **DOCKET NO. 15-00093**

PETITION TO INTERVENE

Pursuant to T.C.A. § 4-5-310(a), Sunrun Inc. (“Sunrun”) moves to intervene as a matter of right in the above-captioned “Petition of Kingsport Power Company d/b/a AEP Appalachian Power General Rate Case.”

Sunrun is the largest dedicated residential solar company in the United States. The company designs, installs, monitors and maintains the solar panels on a homeowner’s roof. Sunrun currently offers service to customers in South Carolina and fourteen other states and would like to expand into Tennessee, including the service area of Kingsport Power.

In this rate case, Kingsport proposes substantial changes to its “Net Metering Service Rider” tariff, which governs the rates, terms, and conditions applicable to qualifying customers who generate solar energy which is intended primarily to offset all or part of the customer’s own electricity requirements. As described in the pre-filed testimony of Kingsport witness, William Castle, Kingsport proposes to close its current net metering services to new customers at the end of 2016 and to offer a different, net metering service to customers beginning in 2017. The new tariff will require customers to begin paying a demand charge, which is not required by the existing tariff, and will also reduce the rate paid (credited) for customer-generated electricity. These changes will make customer-generated solar power a less attractive option and would therefore have a detrimental impact on Sunrun’s ability to offer service to customers in the Kingsport service area.


Because of these proposed changes in Kingsport's tariff, Sunrun has a financial interest in the outcome of this proceeding. Therefore, the "legal rights, duties, privileges, immunities or other legal interest" of Sunrun may be determined in this proceeding. Furthermore, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing this intervention.

For these reasons, Sunrun asks that this Petition to Intervene be granted and for such other relief as Sunrun may be entitled to receive.

Respectfully submitted,

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By: _____


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CERTIFICATE OF SERVICE

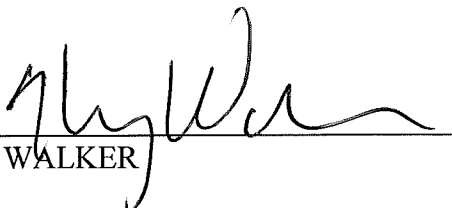
I hereby certify that on the 26th day of October, 2015, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

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