FILED

FEB 0 1 2021

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

FEB 0 1 2021

COMMISSION

Docket No. 2021-AD-19

IN RE: ORDER ESTABLISHING DOCKET TO REVIEW THE EFFICACY AND FAIRNESS OF THE NET METERING AND INTERCONNECTION RULES

## MOTION TO INTERVENE

COMES NOW PosiGen, Inc. ("PosiGen"), pursuant to RP 6.121 of the Mississippi Public Service Commission's ("Commission") Public Utilities Rules of Practice and Procedure ("Rules") and hereby files this Motion to Intervene in the above-styled proceeding. In support thereof, PosiGen submits the following:

- 1. PosiGen is a residential solar installer with a focus on providing affordable solar to low-to-moderate income homeowners.
- 2. PosiGen has installed more than 15,000 net-metered solar installations in the states of Louisiana, New York, Connecticut, New Jersey, and Florida. As a developer of rooftop solar, PosiGen has a substantial interest in the review of Mississippi's net metering and interconnection rules and ensuring such rules are fair to consumers and effective in achieving their intended purpose.
- 3. PosiGen has a substantial interest in net metering and interconnection rules because it is considering expanding operations into Mississippi. The rules adopted in this proceeding will be pivotal for PosiGen's business decision. Through its participation in this proceeding, PosiGen can also provide a unique perspective regarding the rules impacting solar for low-to-moderate income homeowners and provide additional insight from its experience operating in other states.
- PosiGen participated in the Commission's previous investigation that ultimately resulted in the net metering and interconnection rules currently in place today. PosiGen was

granted late intervention in Docket No. 2011-AD-2 and provided both comments and reply comments in that proceeding to help inform the Commission's consideration of the rules.

5. The name and address of the person who is authorized to accept service of filings on behalf of PosiGen is:

Elizabeth Galante Senior VP of Business Development PosiGen 819 Central Ave, Suite 210 New Orleans, LA 70121 Tel: (504)293-4819

Fax: (504)275-1209 bgalante@posigen.com

6. PosiGen requests intervention as a full party of record, including the right to present testimony and exhibits and to cross-examine witnesses. PosiGen's rights and interests in this matter will not adequately be represented by any other party, and its participation will not unduly delay these proceedings.

WHEREFORE, PosiGen respectfully requests that the Commission enter an Order granting this Motion and allowing PosiGen to become a full party of record in the above-styled proceeding.

Respectfully submitted this 1st day of February, 2021

Elizabeth Galante

Senior VP of Business Development

PosiGen

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## **CERTIFICATE OF SERVICE**

- I, Elizabeth Galante, do hereby certify that in compliance with RP 6.122(2) of the Rules:
- 1. An electronic copy of the filing has been filed with the Commission via e-mail to the following address: efile.psc@psc.state.ms.us.
- 2. An electronic copy of the filing has been served via e-mail to the following addresses:

Katherine Collier <u>katherine.collier@psc.ms.us</u> Sally Doty sally.doty@mpus.ms.gov Shawn S. Shurden ssshurde@southernco.com Bryan W. Estes chipestes@,email.com Hart Martin hart.martin@ago.ms.gov Stephen B. Jackson siackson@cooperativeenergy.com Alan Wilson awilson@cooperativeenergy.com Ryan Burrage ryan.burrage@entegritypartners.com Robert Wiygul robert@wwglaw.com Beth L. Orlansky borlansky@mscenterforiustive.org Randy E. Carroll Rearroll@EMEPA.com Kacey Guy Bailey kacey@gloveryoung.com Stephen Wright swright@gsreia.org Larry D. Moffet larry@larrymoffett.com Paul Purnell purnell@ecm.coop Hunter Walters walters@ecm.coop William G. Giese wgiese@seia.org

This the 1<sup>st</sup> day of February, 2021.

Elizabeth Galante

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