

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

Order Instituting Rulemaking Pursuant
to Assembly Bill 2514 to Consider the
Adoption of Procurement Targets for
Viable and Cost-Effective Energy Storage
Systems.

Rulemaking 10-12-007
(Filed December 16, 2010)

MOTION OF JACK ELLIS REQUESTING PARTY STATUS

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Dated: June 30, 2011

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THE STATE OF CALIFORNIA**

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MOTION OF JACK ELLIS REQUESTING PARTY STATUS

I. Motion for Party Status

Pursuant to Rule 1.4(a) and Rule 11.1(b) of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, I, Jack Ellis, hereby submit this motion for party status in the above-captioned proceeding.

I am not representing a stakeholder or party interest in this proceeding, however I believe my participation will lead to a more complete record that can help the Commission reach an informed decision

My professional qualifications include more than 35 years of industry experience, and 15 years performing and directing studies that required the use of production simulation models. I have conducted or been involved in simulations and operational studies of the California statewide grid in a variety of capacities since 1979. I conducted numerous economic analyses of storage projects and technologies, including Compressed Air

Energy Storage and conventional pumped storage, for both utilities and the Electric Power Research Institute, from the late 1970s through the early 1990s. I am familiar with the technical, economic, policy and ratemaking issues that are likely to arise in the course of this proceeding and will provide independent viewpoints that are unlikely to be offered by other parties.

Accordingly, I respectfully request that I be granted party status and that all correspondence, pleadings, notices, orders, rulings and other communications concerning this proceeding be provided to me, preferably via e-mail, at the address shown below.

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If this motion is granted, I request that the Docket Office remove me from the information-only list for this proceeding.

Respectfully submitted,

/s/ Jack Ellis

Dated: June 30, 2011

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **MOTION OF JACK ELLIS REQUESTING PARTY STATUS OF JACK ELLIS** on all parties identified on the service list obtained from the Commission's web site as of June 30, 2011.

Copies have been transmitted to all parties on the service list for R.10-12-007.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 30th day of June, 2011 at Tahoe City, California.

/s/

Jack Ellis

Service List for R.10-12-007 as of June 30, 2011

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