

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

In the Matter of the Application of San Diego
Gas & Electric Company (U902E) for Adoption
of its Smart Grid Deployment Plan

Application 11-06-006
(Filed June 6, 2011)

And Related Matters.

Application 11-06-029
Application 11-07-001

MOTION OF ENVIRONMENTAL DEFENSE FUND
REQUESTING PARTY STATUS

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Dated: August 7, 2011

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I. INTRODUCTION

Pursuant to Rule 1.4 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Environmental Defense Fund, Inc. (“EDF”) submits this Motion for Party Status in the consolidated application proceeding, which includes the:

- Application of San Diego Gas & Electric Company (“SDG&E”) for Adoption of its Smart Grid Deployment Plan (A. 11-06-006);
- Application of Pacific Gas and Electric Company (“PG&E”) for Adoption of its Smart Grid Deployment Plan (A. 11-06-029); and
- Application of Southern California Edison Company (“SCE”) for Approval of its Smart Grid Deployment Plan (A. 11-07-001).

II. DISCUSSION

This motion for party status is hereby filed by Environmental Defense Fund, a leading national nonprofit environmental advocacy organization representing more than 700,000 members across the country, including more than 100,000 in California.. Appearance by Environmental Defense Fund in this proceeding shall be made by Lauren Navarro, Attorney.

Since 1967, EDF has linked science, economics and law to create innovative, equitable and cost-effective solutions to society's most urgent environmental problems. As an organization, EDF has been active in California on environmental issues since the 1970's, and has participated in proceedings on energy-related topics at the California Public Utility Commission since 1976. During these proceedings EDF had provided extensive analysis on the development and use of market-based instruments and principles for achieving combined environmental and economic success.

EDF has been actively participating in R.08-12-009¹ since February 2010, and provided information that the Commission used to develop the environmental requirements in the Decision Adopting Requirements for Smart Grid Deployment Plans Pursuant to SB 17 (Padilla), Chapter 327, Statutes of 2009 (D.10-06-047). These comments draw on the experience gained to date through our active participation in R.08-12-009 and the Pecan Street Partnership ("PSP"),² and our involvement with the Citizen Utility Board (CUB) in Illinois.

¹ Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's own Motion to Actively Guide Policy in California's, R.08-12-009

² PSP is a pilot for smart grid technology and related business models to enable the City of Austin to achieve aggressive renewable energy, energy efficiency, and other environmental goals. More information about the Pecan Street Project, a collaboration of EDF, Austin Energy, the Austin Chamber of Commerce, the University of Texas and the City of Austin can be found at PecanStreetProject.org. EDF's role in the project includes managing collaboration with leading technology companies including Cisco, Dell, Gridpoint, IBM, and Microsoft, and developing the environmental performance goals and metrics. On March 24th, 2010, the PSP participants released a report of recommendations for transforming electricity delivery into a customer-focused clean energy system.

Our deep involvement in these projects stems from the enormous opportunity that well-designed smart grids present for California and the United States. They can reduce our reliance on fossil fuels by optimizing grid efficiency, bringing clean power online, and even enabling the transformation of our transportation system,³ while priming the grid for dynamic pricing, innovation, energy storage and new energy services.⁴ All of these abilities add up: according to our recent analysis of leading studies, a well-designed smart grid can reduce the emissions from the electric sector by 30% and the emissions from the transportation sector by 25% nationally by 2030.⁵ Ensuring that this potential becomes reality directly implicates the interests of our members, because it will improve the quality of the air that they breathe and help to protect the environment.

III. SERVICE

Service of notices, orders, and other communications and correspondence in the proceeding should be directed to Environmental Defense Fund at the address set for the below:

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³ Electric Power Research Institute (EPRI), Methodological Approach for Estimating the Benefits and Costs of Smart Grid Demonstration Projects, Jan. 2010, p. 1-1, *available at* http://my.epri.com/portal/server.pt?Abstract_id=00000000001020342

⁴ *Id.*

⁵ Studies include: Silver Spring Networks, "Connecting Smart Grid and Climate Change," Michael Jung and Peter Yeung, Silver Spring Networks; PNNL: http://energyenvironment.pnl.gov/news/pdf/PNNL-19112_Revision_1_Final.pdf; Austin Energy 2010 Annual Report of System Information; US Energy Information Administration, Annual Energy Outlook, 2010; khlaq Sidhu, Burghardt Tenderich: http://cet.berkeley.edu/dl/CET_Technical%20Brief_EconomicModel2030_f.pdf

IV. CONCLUSION

Environmental Defense Fund's participation in this proceeding will not prejudice any party, and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Environmental Defense Fund respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on August 7, 2011

ENVIRONMENTAL DEFENSE FUND

/s/ LAUREN NAVARRO

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day have served a true copy of MOTION OF ENVIRONMENTAL DEFENSE FUND REQUESTING PARTY STATUS, on all parties identified on the attached official service lists for A.11-06-029 and R.08-12-009.

Service was completed by serving an electronic copy on their email address of record, and by mailing paper copies to parties without email addresses.

Executed on August 7, 2011 at Sacramento, California

ENVIRONMENTAL DEFENSE FUND

/s/ LAUREN NAVARRO

LAUREN NAVARRO

Attorney

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