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

Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.

Rulemaking 11-05-005 (Filed May 5, 2011)

# MOTION OF PATHFINDER RENEWABLE WIND ENERGY, LLC TO BECOME A PARTY

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August 5, 2011

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Attorney for Pathfinder Renewable Wind Energy, LLC

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Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission's Rules of Practice and Procedure, Pathfinder Renewable Wind Energy, LLC ("Pathfinder") submits this motion to become a party in this proceeding, R.11-05-005.

### I. DESCRIPTION OF PATHFINDER

Pathfinder owns and operates Wyoming's historic Pathfinder Ranch. Pathfinder is also advancing the development of new wind generation assets and expanded power transmission for markets throughout the Western United States. Pathfinder is unique in that it is partnering with landowner associations, ranchers and individual farmers to meet the nation's growing need for clean, renewable energy resources while working to enhance wildlife habitat and preserve America's ranching heritage. Pathfinder's wind energy vision is based on an appreciation for rural economies, communities, wildlife, scenic viewsheds and cultural resources.<sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> More information on how Pathfinder advances these goals can be found on our website, at <u>http://www.pathfinderwind.com/index.php</u>.

#### II. PATHFINDER'S INTEREST IN THIS PROCEEDING

As Pathfinder seeks to contribute to the mix of renewable energy resources serving the West, the rules and policies developed in this proceeding are integral to how, and under what conditions, Pathfinder will be able to economically provide renewable energy to California customers.

In particular, Pathfinder intends to encourage this Commission to adopt decisions that provide the greatest amount of flexibility to parties developing and procuring renewable energy for the 33 percent Renewable Portfolio Standard ("RPS"). Greater flexibility should include a mix of renewable resources, ownership interests, resource locations, and terms of power purchase agreements for renewable energy. Pathfinder's positions in this proceeding shall support a least-cost approach to planning principals for developing renewable generation. Consideration of least-cost impacts, and encouragement of least-cost projects, is especially important as California transitions to more aggressive renewable goals that have the potential to result in greater pressure on the cost of renewable energy. In general, Pathfinder supports proven, efficient renewable technologies for meeting California's renewable and greenhouse gas objectives, and Pathfinder is interested in contributing to this proceeding by supporting policies that will develop a market for renewable energy that provides equitable treatment of resources that can actually deliver renewable energy into California.

For these reasons, Pathfinder respectfully requests that it be granted party status in this proceeding.

#### III. SERVICE

Service of notices, orders, and other communications and correspondence in this

2

proceeding should be directed to the following persons:

Jeff Meyer Pathfinder Renewable Wind Energy, LLC 2720 Park Street, Suite 222 Jacksonville, FL 32205 Phone: (904) 553-8620 Fax: (904) 768-4630 Email: <u>imeyer@pathfinderwind.com</u>

[Party Status]

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Attorney for Pathfinder Renewable Wind Energy, LLC

[Information Only Status]

# IV. CONCLUSION

Pathfinder respectfully requests that the Commission grant Pathfinder's motion for party status. Pathfinder is a unique wind energy generation and transmission developer serving the Western United States. Pathfinder's participation will contribute to the Commission's understanding of the impacts that the decisions adopted in this proceeding may have on the availability of economically priced renewable energy for Californians. Pathfinder's participation will not prejudice any other party to this proceeding or expand the scope of the issues to be considered.

Dated: August 5, 2011

Respectfully submitted,

Christopher T. Ellison Ellison, Schneider & Harris, L.L.P. Attorneys for Pathfinder Renewable Wind Energy, LLC

### VERIFICATION

I am the attorney for Pathfinder Renewable Wind Energy, LLC. ("Pathfinder"). Pathfinder is absent from the County of Sacramento, California, where I have my office, and I make this verification for Pathfinder for that reason. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on August 5, 2011 at Sacramento, California.

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Christopher T. Ellison Attorney for Pathfinder Renewable Wind Energy, LLC