

BEFORE THE PUBLIC UTILITIES COMMISSION 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 NGK INSULATORS, LTD. FOR PARTY STATUS

Harold Gotschall,
Principal
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(U.S. agent for
NGK Insulators, LTD.)

September 16, 2011

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NGK Insulators, LTD. (NGK) based in Nagoya, Japan, respectfully moves for Party Status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission Rules of Practice and Procedure.

I. NGK'S INTEREST IN THIS PROCEEDING

This motion for Party Status is filed in order for NGK to participate formally as an active party in this proceeding. NGK has developed and supplies the Sodium-Sulfur (NAS) Battery, an advanced energy storage technology for grid-scale applications including the integration of renewable energy resources. NAS Battery systems provided by NGK are currently being installed at two locations for the Pacific Gas and Electric Company (PG&E) and one location for the Southern California Edison Company (SCE) in California. Moreover, all of these projects have experienced multi-year delays we the regulatory and institutional barriers under consideration in these proceedings. Thus, NGK can contribute its real world experience in addressing the resolution of such impediments to the future deployment of NAS and similar energy storage technologies. NGK has recently begun participating in this proceeding informally and by way of this Motion is also seeking the opportunity to formally participate in this proceeding.

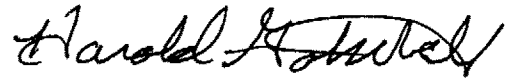
II. NOTICES

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to the address below.

III. CONCLUSIONS

NGK's participation in this proceeding will not prejudice any party, delay the schedule, nor broaden the scope of issues in the proceeding. For the reasons set forth herein, NGK respectfully requests that the Commission grant this Motion for Party Status.

Respectfully Submitted,



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