

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

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans.

Rulemaking 10-05-006
(Filed May 6, 2010)

**WELLHEAD ELECTRIC COMPANY, INC.
MOTION FOR PARTY STATUS**

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October 13, 2011

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I. INTRODUCTION.

Pursuant to Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Wellhead Electric Company, Inc. (“WEC”) hereby respectfully files this Motion for Party Status in the above captioned proceeding.

II. BACKGROUND.

WEC provides management services to, and is affiliated through common ownership with, special purpose entities that build, own and operate generating facilities in California. Specifically, WEC’s affiliates currently have nine generating projects delivering power to the California electric system. Eight of these projects are exempt wholesale generators (“EWGs”) with market-based rate authority from the Commission and the other is a qualifying cogeneration facility (“QF”) under the Public Utility Regulatory Policies Act.

III. BASIS FOR THE INTERVENTION.

WEC is interested in ensuring that greenhouse gas compliance rules are implemented in such a way that consider pre-AB 32 cost recovery for independent power producers that may have contracts with utilities that extend beyond 2012 for which there is no clear

mechanism for recovery of new GHG costs. This issue was identified for consideration in Rulemaking (R.) 11-03-012, the OIR to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emission, to which Wellhead is a party. However, the Commission subsequently decided to move this issue into (R.) 10-05-006. Since WEC may be directly affected by the outcome of the Commission's consideration of this issue in this proceeding, WEC requests the Commission grant this Motion for Party Status which is in the public interest.

IV. SERVICE.

All correspondence, pleadings, notices, orders and other communications in this proceeding should be addressed to the following:

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V. CONCLUSION.

WEC respectfully requests that the Commission grant this Motion for Party Status. WEC's participation in this proceeding will not prejudice any other party to this proceeding or expand the scope of the issues to be considered. Finally, WEC's participation can assist the Commission's understanding relating to independent power producers who currently do not have a cost recover mechanism for pre-AB 32 contracts that extend beyond 2012.

DATED this 13th day of October, 2011, at Sacramento, California.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DK Kerner', is written over a horizontal line. The signature is stylized and cursive.

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