

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

Order Instituting Rulemaking to Oversee  
the Resource Adequacy Program, Consider  
Program Refinements and Establish  
Annual Local Procurement Obligations.

R.11-10-023  
(Filed October 20, 2011)

**MOTION OF THE CITY AND COUNTY OF SAN FRANCISCO  
FOR PARTY STATUS**

In accordance with Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the City and County of San Francisco (“City”) respectfully submits this Motion for Party Status in Rulemaking 11-10-023, in which the Commission will oversee the Resource Adequacy Program, consider program refinements, and establish annual local procurement obligations.

The City has an interest in this proceeding on a variety of levels. The City is both a publicly-owned utility and a community-choice aggregator. Some San Francisco residents and business owners are bundled customers of PG&E who pay costs associated with the Commission’s Resource Adequacy Program. Because of the City’s varied roles, among others reasons, the City’s interests in this proceeding cannot be adequately represented by any other party to this proceeding.

As a publicly-owned electric utility, the City is particularly concerned about the Commission’s review of the CAISO’s flexible capacity product procurement proposals. As a community-choice aggregator, as stated in the Commission’s Scoping Ruling, the City has already been made a respondent to this proceeding, because the City will have to comply with the Commission’s resource adequacy requirements. As a municipality, the City is concerned about the costs its residents and business owners must pay for electricity.

The City seeks to become a party to this proceeding now, therefore, in order to analyze the proposals submitted by the parties, comment on those proposals, and perhaps craft additional proposals with respect to those issues identified in the Commission's Scoping Ruling that directly affect the City's interests as stated herein.

The City requests that, should the Commission grant the City's motion, the following persons be added to the service list on behalf of the City:

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Based on the foregoing, the City respectfully requests that its motion be granted and that the City be made a party to this proceeding.

Dated: January 18, 2012

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