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

Rulemaking 11-10-023 (Filed October 20, 2011)

MOTION OF SIERRA CLUB REQUESTING PARTY STATUS

Matthew Vespa Staff Attorney Sierra Club 85 Second St., 2nd Floor San Francisco, CA 94105 Telephone: (415) 977-5753

Email: matt.vespa@sierraclub.org
Attorney for Sierra Club

Dated: April 25, 2012

I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the California Public Utilities Commission's (Commission's) Rules of Practice and Procedure, Sierra Club respectfully submits this request and motion for party status in Rulemaking 11-10-023, Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations.

II. DISCUSSION

Sierra Club is a non-profit environmental organization incorporated under the laws of the State of California. Over 187,000 of Sierra Club's members live and purchase utility services in California. Sierra Club's mission is to promote the responsible use of the earth's ecosystems and resources; educate and enlist humanity to protect and restore the quality of the natural and human environment; and use all lawful means to carry out these objectives. Sierra Club is a leader in the effort to reduce California's and the nation's dependence on fossil fuels. The highest priority of Sierra Club's work is eliminating the need for fossil fuel-fired power plants through the development of affordable renewable energy.

The interests of the customers represented by Sierra Club are unique and well suited to this proceeding. As the Commission has recognized: "With respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging. They represent

customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example." D.98-04-059, at 30 n. 14. Sierra Club brings to this proceeding its members' unique perspective and experience advancing innovative technical and regulatory solutions to increase renewable energy sources and drastically reduce California's carbon footprint.

Sierra Club has a strong interest in resource adequacy program and its implications for both utility-scale and distributed renewable energy resources as California transitions to higher levels of renewable penetration. Sierra Club would like to have an active role in this Rulemaking to review, evaluate and opine on the issues presented. The Sierra Club is a frequent participant in Commission dockets with implications for renewable energy deployment and believes its participation is warranted in this proceeding.

III. SERVICE

Service of notices, orders, and other communications and correspondence in the proceeding should be directed to the address set forth below:

Matthew Vespa Staff Attorney Sierra Club Environmental Law Program 85 Second St., 2nd Floor San Francisco, CA 94105 (415) 977-5753 matt.vespa@sierraclub.org

IV. CONCLUSION

For the reasons stated above, Sierra Club respectfully asks the Commission to grant Sierra Club's Motion Requesting Party Status.

Dated: April 25, 2012

Respectfully submitted,

Matthew Vespa Staff Attorney

Sierra Club Environmental Law Program 85 Second St., 2nd Floor San Francisco, CA 94105

(415) 977-5753

matt.vespa@sierraclub.org