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)

CLEAN COALITION'S MOTION FOR PARTY STATUS

Kenneth Sahm White Clean Coalition 2 Palo Alto Square 3000 El Camino Real, Suite 500 Palo Alto, CA 94306 831-425-5866 sahm@clean-coalition.org

May 18th, 2012

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Pursuant to the Commission Rules 1.4 and 11.1 of Practice and Procedure, the Clean Coalition respectfully requests party status of Phase 2 of this proceeding.

The Clean Coalition is a California-based group that advocates for vigorous expansion of the Wholesale Distributed Generation (WDG) market segment, which is comprised of renewable energy generation that connects to the distribution grid and serves local load. Since penetrations of WDG above about 20% require local balancing of supply and demand of energy, the Clean Coalition not only drives policy innovation that removes the top barriers to WDG (procurement and interconnection), but also drives policy innovations that will allow private capital to deploy Intelligent Grid (IG) solutions like demand response and energy storage. The Clean Coalition is active in proceedings at the California Public Utilities Commission, the Federal Energy Regulatory Commission, and related federal and state agencies throughout the United States. The Clean Coalition also designs and implements WDG and IG programs for local utilities and governments around the country.

The Clean Coalition has been active before this Commission in various proceedings surrounding Long Term Procurement Planning (LTPP), the Renewables Portfolio Standard (RPS) and other proceedings as it relates to Resource Adequacy (RA). RA has long been a priority of the Clean Coalition's policy platform, especially in the context of ensuring reliability in energy deliverability. The Clean Coalition also has a direct interest in addressing the following matters related to this proceeding as reported in the Phase 1 scoping memo:

- The yearly Local Capacity Requirements (LCR) recommended by CAISO for 2014;
- The RA rules for generation interconnected at the distribution level;
- The RA rules for resources, as it relates specifically to energy storage devices;
- The preparation and review of new studies as it relates to effective load carrying capacity;
- Any additional matters as outlined in the Phase 2 scoping memo.

Services of notices, orders and other communications and correspondence in the

proceeding should be directed to the Clean Coalition at the address set forth below:

Kenneth Sahm White Clean Coalition 2 Palo Alto Square 3000 El Camino Real, Suite 500 Palo Alto, CA 94306 831-425-5866 sahm@clean-coalition.org

Participation by the Clean Coalition in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in this proceeding. For the reasons stated above, the Clean Coalition respectfully requests that the Commission grant this Motion Requesting Party Status.

Respectfully submitted,

/<u>s/ Kenneth Sahm White</u> Kenneth Sahm White Clean Coalition 2 Palo Alto Square 3000 El Camino Real, Suite 500 Palo Alto, CA 94306 831-425-5866 sahm@clean-coalition.org

Dated: May 18, 2012