

**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 12-03-014  
(Filed December 16, 2010)

**MOTION OF TAS ENERGY  
FOR PARTY STATUS**

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July 23, 2012

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TAS Energy (“TAS”) respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

**I. DESCRIPTION OF TAS.**

TAS is a technology company based in Houston, Texas that manufactures clean energy equipment, including a chilling and storage solution for gas turbines called “Generation Storage.” TAS Energy is a privately held company with 350 employees whose facility encompasses over 275,000 square feet of manufacturing space.

With about half of its generation coming from natural gas-fired sources,<sup>1</sup> California has over 1,200 megawatts of flexible capacity that can be recovered through retrofitting current combined cycle gas turbines. These megawatts begin to be lost, and thereby recovered through chilling, when temperatures increase above the design temperature. Adding storage to the systems provides instantaneous regulation up or down flexible capacity according to grid need.

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<sup>1</sup> Source: California Energy Commission (2011)

TAS seeks to invest time and resources in actively participating in this proceeding to help ensure that retrofits to existing gas assets, specially chilling and storage on combined cycle gas assets, are fully understood and considered in long term procurement plans.

## **II. TAS' INTEREST IN THIS PROCEEDING.**

TAS' interest in party status in this proceeding is to file reply testimony responsive to the Assigned Commissioner's Ruling, and not to reply to testimonies filed by other parties., testify in support of its reply testimony at hearing scheduled to begin on August 7, 2012, file briefs, and otherwise directly and actively engage in discussions by the Commission on how California can best procure capacity with a new interest in flexible capacity for the lowest cost to rate payers with the best emissions profile through first retrofitting existing assets.

TAS does not plan to cross-examine any other witnesses in this proceeding. Without the opportunity to fully engage in these discussion, the Commission, the Load Serving Entities, rate payer advocates, the environmental community, and other interested parties might not be aware of the ability for retrofits to existing assets to provide needed resources for California rate payers at 1/3 the cost of the traditional investment (new simple cycle peaking units) with ½ the emissions.

## **III. NOTICE**

Concurrent with filing this motion, TAS has served its testimony in response to the opening testimonies filed by Southern California Edison (SCE), by San Diego Gas & Electric (SDG&E), and jointly by the Alliance for Retail Energy Markets (AReM), the Direct Access Customer Coalition (DACC), and the Marin Energy Authority (MEA).

TAS requests that all correspondence, pleadings, notices, orders, rulings and other communications concerning this proceeding be provided to the following:

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#### IV. CONCLUSION

TAS' participation in this proceeding will not prejudice any party, and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, TAS respectfully requests that the Commission grant this Motion for Party Status.

Respectfully submitted,



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