

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

Order Instituting Rulemaking to Continue
Implementation and Administration of
California Renewables Portfolio Standard
Program.

Rulemaking 11-05-005

(Filed May 5, 2011)

MOTION FOR PARTY STATUS OF NEW DIMENSION ENERGY COMPANY, LLC

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November 20, 2012

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Pursuant to Rule 1.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, New Dimension Energy Company, LLC ("NDEC") hereby moves to become a party to the above-captioned proceeding.

I. DESCRIPTION OF NDEC

NDEC is a wholly-owned subsidiary of FloDesign Wind Turbine Corp. ("FloDesign" or "FDWT"). FloDesign is a developer and manufacturer of a new, high-efficiency shrouded wind turbine that adapts aerodynamic principles from modern, low-turbulence jet engine design to significantly increase power output per unit of swept area.

NDEC's business objective is to accelerate market acceptance of FloDesign's turbine technology by developing projects that illustrate both its improved aerodynamic performance as well as a range of environmental and siting advantages including: low noise; reduced height and visual impact; simpler logistics and reduced impacts related to construction; and reduced land requirements through closer turbine spacing. FloDesign is also conducting a multi-year study, with support from the California Energy Commission's PIER program, that will include a multi-turbine deployment at a NDEC-controlled site in the Altamont Pass Wind Resource Area in 2014. The purpose of this study is to evaluate the hypothesis that the smaller, lower and shrouded design of FloDesign's turbine will result in reduced wind-avian impacts.

II. NDEC'S INTEREST IN THIS PROCEEDING

NDEC's request for party status in this proceeding is based on its interest in assuring that the full potential contribution of wind energy to California's Renewables Portfolio Standard ("RPS") goals is realized. NDEC is concerned, in particular, that wind energy should not be overlooked by the Commission, and the companies subject to its jurisdiction, as an option for meeting distributed energy requirements and opportunities. NDEC's concern is based on two prevalent myths or misconceptions common in the arena of renewable energy:

Myth #1: wind is necessarily a resource for remote areas, and therefore dependent on transmission. At present, wind energy is generally identified with projects using larger, utility-scale turbines. While scale economies of production have driven the wind industry toward large turbines, experience has shown that very large machines can be difficult or impossible to site close to heavily settled areas. As a result, wind has not gained prominent consideration as a solution for distributed energy needs. At the same time, buildout of the transmission system to accommodate remote renewable energy resources has become costly and contentious. As a result, NDEC believes, California is still far from realizing the full potential contribution of clean, renewable wind energy to its energy mix.

NDEC believes that new technologies like the FloDesign turbine can help to change this traditional conception of wind energy. Given the magnitude of California's 33% RPS requirement, and indications of popular and political pressure to raise the RPS target in the future, there remains a pressing need for additional renewable energy in all forms and at all scales. NDEC supports and will continue to support cost-effective expansion of the transmission system to accommodate remote sources of clean energy. However, NDEC also believes it is

important to develop new solutions that can enable the economic development of wind projects at much smaller scale, physically and electrically closer to load.

Myth #2: distributed renewable generation equates to solar generation. Likewise, within the past couple of years, the concept of distributed renewable generation has come to be identified closely, if not exclusively, with solar energy, specifically, solar photovoltaics (“PV”). From a system-level perspective, however, it is critical to maintain diversity among renewable resources based on their daily and seasonal availability. While PV produces significant quantities of energy during midday peak periods of insolation, it yields little or no value outside this period. In fact, there are indications that growing penetration of PV will result in a progressive shift in net load toward the late afternoon and early evening hours, the period when wind energy is most available at many locations.¹

In NDEC’s view, solar PV and wind energy each offer distinct value. These resource types are best viewed not as direct competitors but rather as natural complements to each other in a well-balanced, clean and renewables-based power system. Within such a carefully-balanced system, increased use of one of these resources can enable increased use of the other, and the use of one resource need not limit or preclude the use of the other. For example, PV resources have zero impact on distribution feeders during overnight periods when minimum loading typically occurs, and their presence should not preclude the use of additional wind energy.

NDEC seeks to ensure that these perspectives are reflected in Commission policies on RPS implementation as they evolve through this proceeding. NDEC accepts the record as is.

¹ See, e.g., http://www.caiso.com/Documents/Presentation_E3_CAISO_Step2NeedAnalysis_Feb10_2012.pdf (slide #8) Arne Olson, Ryan Jones, Chasing Grid Parity: Understanding the Dynamic Value of Renewable Energy, The Electricity Journal, Volume 25, Issue 3, April 2012, Pages 17-27, ISSN 1040-6190, 10.1016/j.tej.2012.03.001. <http://www.sciencedirect.com/science/article/pii/S1040619012000541>

III. DESIGNATION OF SERVICE

NDEC consents to electronic service at the following address:

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IV. CONCLUSION

NDEC's 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, NDEC respectfully requests that the Commission grant this Motion for Party Status and provide NDEC full party status in this proceeding.

Respectfully submitted,

/s/ John B. Howe

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Dated: November 20, 2012

VERIFICATION

I, John B. Howe, am the Director of Public Affairs of New Dimension Energy Company, LLC. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of MOTION FOR PARTY STATUS OF NEW DIMENSION ENERGY COMPANY, LLC are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2012 at Waltham, Massachusetts.

/s/ John B. Howe

John B. Howe
Director of Public Affairs
New Dimension Energy Company, LLC