BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities' Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations.

Rulemaking 12-06-013 (Filed June 21, 2012)

MOTION OF SOLARCITY CORPORATION FOR PARTY STATUS

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On behalf of SolarCity Corporation

December 18, 2012

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Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, SolarCity Corporation (SolarCity) respectfully submits this motion to request party status in R. 12-06-013.

SolarCity is California's leading full service provider of photovoltaic ("PV") solar power systems, with more than 9,000 projects installed or underway in California. SolarCity provides integrated PV solar system services to its customers from a single source, including engineering, design, financing, installation, leasing, and monitoring services. SolarCity also provides a range of energy efficiency services, which enables the company to provide additional ways for residential ratepayers in California to save money and allows residential PV customers to reduce their electricity load to optimize system sizing.

I. SolarCity's Interest in R.12-06-013

SolarCity has a distinct interest in the Commission's consideration of residential rate design. Rate design informs the decisions of residential customers to engage in a range of activities, from energy efficiency to investing in solar energy systems, by sending distinct price signals to encourage those behaviors. The existing tiered rate structure has been in place during a period of unprecedented growth in the solar industry and has encouraged residential customers to undertake energy efficiency measures. As a provider of residential solar and energy efficiency services, SolarCity is directly impacted by any changes to the existing rate design and has a

unique interest in this proceeding. No other party shares SolarCity's unique perspective and no other party will adequately represent SolarCity's interest in this proceeding. SolarCity expects to positively contribute the record based on its extensive experience as a participant in Commission-approved programs targeted at residential customers, including the Energy Upgrade California and California Solar Initiative programs.

SolarCity's participation in this proceeding will not delay the schedule or broaden the scope of this proceeding and will not prejudice any party.

Lastly, SolarCity requests that the Commission grant it party status and accept into the record reply comments on coordination questions that were served on parties to this proceeding on December 7, 2012. SolarCity, per instructions from the docket office, is re-filing those reply comments concurrently with this motion, with the reply comments retaining the original filing date of December 7, 2012.

II. Correspondence and Service

All documents required to be served in this proceeding, and any other communications or correspondence, should be addressed to:

> David Wooley Keves, Fox & Wiedman LLP 436 14th Street, Suite 1305 Oakland, CA 94612

Tele: (510) 314-8207

Email: dwooley@kfwlaw.com

Additionally, to ensure coverage of the docket, SolarCity requests that the following person be added to the official service list for R.12-06-013 with "information only" status:

> Dan Chia Deputy Director, Government Affairs SolarCity 3055 Clearview Way San Mateo, CA 94402

Tele: (650) 332-0452

Email: dchia@solarcity.com

III. Conclusion

SolarCity respectfully requests that the Commission grant its motion for party status and accept its December 7, 2012 reply comments into the record.

Respectfully submitted at San Francisco, California on December 18, 2012,

By /s/ David Wooley

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