

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

Order Instituting Rulemaking Pursuant to
Assembly Bill 2514 to Consider the
Adoption of Procurement Targets for Viable
and Cost-Effective Energy Storage Systems.

Rulemaking 10-12-007
(Filed December 16, 2010)

**MOTION FOR PARTY STATUS OF
BRIGHTSOURCE ENERGY, INC.**

Pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utility Commission's ("Commission") Rules of Practice and Procedure, BrightSource respectfully files this motion for party status in the above-captioned docket, R.10-12-007.

BrightSource, headquartered in Oakland, California, is engaged in the design, development and construction of large-scale renewable energy generation projects, including concentrating solar power ("CSP") projects with integrated thermal storage. BrightSource is actively developing these solar power projects in western states, and its subsidiaries have contracts with Southern California Edison and Pacific Gas & Electric Company for the purchase of output from these facilities. The nature and extent of regulations implemented pursuant to this proceeding will directly affect the opportunities available for BrightSource to participate in California's electricity markets.

Specifically, this proceeding is evaluating what steps, if any, need to be taken to reduce barriers to the deployment of energy storage, including whether procurement targets are necessary for energy storage technologies, cost-effectiveness of storage technologies, and designation of storage as a "preferred resource" in Commission procurement priorities.

BrightSource has a strong interest in this proceeding as a developer of CSP projects with thermal energy storage that can be adapted and configured to address different types of operational needs emerging on the California power system. BrightSource will be affected by the mechanisms used to impose procurement targets and provide for cost recovery. Additionally, as a designer and developer of CSP with thermal energy storage, BrightSource will be affected by the designation of storage as a "preferred resource," and believes storage from certain resources can provide benefits to the California grid that conventional resources cannot provide, i.e., a low or non-emission solution to energy supply and reliability needs. As a result, BrightSource has a direct and substantial interest in this proceeding that cannot be represented by any other party. BrightSource's participation in this proceeding will not prejudice any other party, delay the proceeding, or unduly expand its scope.

Communications to BrightSource in this proceeding may be directed to:

Arthur L. Haubenstock
Nidhi J. Thakar
Perkins Coie LLP
Four Embarcadero Center, Suite 2400
San Francisco, CA 94111
Phone: (415) 344-7022
Fax: (415) 344-7050
Email: ahaubenstock@perkinscoie.com
nthakar@perkinscoie.com

Fore the foregoing reasons, BrightSource respectfully requests party status in this proceeding.

Respectfully Submitted,

/s/ Arthur L. Haubenstein

Arthur L. Haubenstein

Nidhi J. Thakar

Perkins Coie LLP

Four Embarcadero Center, Suite 2400

San Francisco, CA 94111

Phone: (415) 344-7022

Fax: (415) 344-7050

Email: ahaubenstein@perkinscoie.com

nthakar@perkinscoie.com

Attorneys for BrightSource Energy, Inc.

Dated: February 27, 2013