# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Pursuant to	)	
Assembly Bill 2514 to Consider the Adoption of	)	<b>Rulemaking 10-12-007</b>
<b>Procurement Targets for Viable and</b>	)	(Filed December 16, 2010)
<b>Cost-Effective Energy Storage Systems</b>	)	
	)	

#### MOTION FOR PARTY STATUS OF BROOKFIELD RENEWABLE ENERGY PARTNERS LP

Glenn S. Benson Perkins Coie LLP 700 Thirteenth Street, N.W. Washington, DC 20005-3960 (202) 654-6255 GBenson@perkinscoie.com

Dated: February 25, 2013

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Pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the California Public Utilities Commission ("CPUC" or "Commission") and the Order Instituting Rulemaking Pursuant to Assembly Bill 2514 to Consider the Adoption of Procurement Targets for Viable and Cost-Effective Energy Storage Systems ("Order Instituting Rulemaking") in the above-captioned proceeding, Brookfield Renewable Energy Partners LP ("Brookfield")<sup>1</sup> respectfully moves that it be added as a party to the above-captioned proceeding.

In compliance with Rule 1.4(b) of the Rules of Practice and Procedure of the Commission, Brookfield states that it has an interest in the above-captioned proceeding. Brookfield has more than 100 years of experience as an owner, operator and developer of hydroelectric power facilities. Brookfield's power generation operations located in North America and Brazil total more than 4,200 MW, of which more than 2,000 MW are in the United States. Brookfield's generating assets are predominantly renewable energy resources (hydro and wind). Within California, Brookfield owns and operates 274 MW of wind capacity in the

<sup>&</sup>lt;sup>1</sup> In November 2011, Brookfield Renewable Energy Partners LP was formed by combining the power generation assets of Brookfield Renewable Power Fund and Brookfield Renewable Power Inc. Brookfield Renewable Energy Partners LP trades on the Toronto Stock Exchange under the symbol BEP.UN and is currently in the process of being listed on the New York Stock exchange. Brookfield Renewable Energy Partners LP's predecessor, Brookfield Renewable Power Inc., has been accorded party status in this proceeding and has been actively participating in the proceeding from its inception. Brookfield Renewable Energy Partners LP is submitting a motion for party status under the new company name, Brookfield Renewable Energy Partners LP, which resulted from the reorganization.

Tehachapi Pass as well as the 30 MW Malacha hydroelectric facility. Brookfield also has the 280 MW Mulqueeney Ranch Pumped Storage Project located in Livermore, California under development. Based on its experience in the power industry and commitment to improving the environment, Brookfield has an interest in the subject matter of the above-captioned proceeding—the adoption of procurement targets for viable and cost-effective energy storage systems—and seeks to comment in response to requests for comment issued by the Commission in the above-captioned proceeding as contemplated in the Order Instituting Rulemaking.

Brookfield requests that it be granted party status in this proceeding and that the following individuals be placed on the service list for this docket as representatives of Brookfield:

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Glenn S. Benson Perkins Coie LLP 700 Thirteenth Street, N.W. Washington, DC 2005-3960 (202) 654-6255 GBenson@perkinscoie.com Brookfield appreciates the opportunity to submit this motion and looks forward to working with the Commission and other market participants on this important issue.

Respectfully submitted,

## BROOKFIELD RENEWABLE ENERGY PARTNERS LP

/s/ Glenn S. Benson

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