

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 (AYK)  
(Filed December 16, 2010)

**THE CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE  
MOTION FOR PARTY STATUS**

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Dated: May 9, 2013

Attorneys for  
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Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, The California Environmental Justice Alliance ("CEJA") hereby moves for party status in the Rulemaking proceeding (R.) 10-12-007.

**INTRODUCTION AND PARTY DESCRIPTION**

The California Environmental Justice Alliance is an alliance of six grassroots environmental justice organizations that are situated throughout the state of California. CEJA's six organizations represent utility customers throughout California that are concerned about their health and the environment. The organizational members of CEJA are: Asian Pacific Environmental Network, The Center for Community Action and Environmental Justice, Center on Race, Poverty & the Environment, Communities for a Better Environment, Environmental Health Coalition, and People Organizing to Demand Environmental and Economic Justice. CEJA is an unincorporated organization that is fiscally sponsored by the Environmental Health Coalition. All of the members of CEJA are non-profit public interest entities.

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## **CEJA'S INTEREST IN THIS PROCEEDING**

CEJA represents organizations whose members live in low-income communities and communities of color overburdened by pollution, including from power plants. These members are utility customers that share a concern for the environment. The concerns of these members distinguish their interests from Commission staff and other California ratepayers participating in this matter. Together, the six member organizations of CEJA are working to achieve environmental justice for low-income communities and communities of color throughout the state of California. In particular, CEJA is pushing for policies at the federal, state, regional and local levels that protect public health and the environment. CEJA is also working to ensure that California enacts statewide climate change policies that protect low-income communities and communities of color. As an organization, CEJA has worked in communities throughout the state to bring about a just, sustainable energy future. CEJA and its member organizations bring organizing, legal and research resources to these communities in order to fight the environmental justice impacts of the existing energy system, and provide decision-makers with a viable roadmap to the transition that these communities seek. Related to this initiative, CEJA brings together stakeholder events regarding renewable energy development, participates in strategically important PUC proceedings, and advocates for changes to state law that will provide vital incentives for the necessary transition.

## **ANTICIPATED SCOPE OF CEJA'S PARTICIPATION**

On May 31, 2011, in a Scoping Memo and Ruling, the assigned Commissioner separated this proceeding into two phases. Phase 1 developed the overall policies and guidelines for energy storage systems ("ESS"). On August 6, 2012, the Commission issued D.12-08-016, adopting the Commission Staff's Proposal. D.12-08-016 also initiated Phase 2 of this

proceeding to analyze the priority scenarios established by Phase 1: generator-sited storage, bulk “generation,” distributed storage and demand-side management. For each of these use cases, Phase 2 will consider:

1. Cost effectiveness
2. Market Needs
3. Barriers
4. Ownership model
5. Procurement target, if necessary

In evaluating each scenario, Phase 2 will also consider activities in other proceedings, such as Resource Adequacy, Long Term Procurement Planning and the Renewables Portfolio Standard. Administrative Law Judge Amy Yip-Kikugawa will issue a Proposed Decision in September 2013, with initial and reply comments due thereafter. However, Commissioner Peterman has indicated that she may “float” an additional Proposed Decision even sooner, also with initial and reply comments due thereafter.

At this juncture, CEJA anticipates participating actively in the remaining aspects of this proceeding by representing the environmental, public health and ratepayers’ interests as described above. CEJA may elect not to participate in issues that have no clear effect on its members or the environment. CEJA is already working with members of the legal, technical and affected ratepayer and environmental justice communities throughout the state to discuss energy planning and environmental impacts of the issues to be considered in this proceeding. CEJA intends to assure environmental and ratepayer interests are protected, by offering comments to any Proposed Decisions. To the extent possible, CEJA will coordinate its participation with other parties in the proceeding to avoid duplication.

At a minimum, CEJA intends to provide comments to the Administrative Law Judge’s Proposed Decision. Recognizing that a number of parties have already filed comments and

participated in workshops, CEJA accepts the record as established prior to CEJA becoming a party.

### **Contact Information**

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

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CEJA respectfully moves for party status in R.10-12-007 to assist the Commission in its consideration of matters concerning the serious ratepayer, environmental and environmental justice issues implicated by procurement policies applicable to energy storage systems.

Respectfully submitted,

May 9, 2013

/s/ ROGER LIN  
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