

**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 OF ENBALA POWER NETWORKS, INC.
FOR PARTY STATUS**

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Date: June 27, 2013

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I. Introduction

In accordance with the provisions of Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), ENBALA Power Networks, Inc. (“ENBALA”, or the “Company”) respectfully moves for party status in this proceeding.

II. Basis for Party Status

A. Description of ENBALA Power Networks

ENBALA Power Networks is a Smart Grid technology company that continuously connects large electricity users to the grid to deliver grid balancing flexibility to electricity system operators and utilities. ENBALA’s innovative Grid Balance platform captures and then intelligently aggregates inherent demand-side process storage from connected loads, to respond to the real-time needs of the power system, increasing its reliability, efficiency and reducing greenhouse gases.

B. ENBALA’s Interest in the Proceeding

ENBALA has a commercial interest in California’s energy storage policy and requests party status in order to file comments in this proceeding. ENBALA believes that its experience providing Regulation

Service in wholesale electrical markets and assisting utilities with renewable power integration utilizing demand-side process storage provides a unique insight to innovative storage solutions. ENBALA believes its perspective can assist the Commission in finding cost-effective solutions to address some of the applications in the Commissions end use cases for energy storage, leading to a truly transformative market for energy storage in California.

C. ENBALA's Participation in the Proceeding

ENBALA intends to participate in this proceeding and contribute to the development of storage procurement strategies, identification of market barriers, and provide insight into innovative and cost-effective storage technology options. ENBALA plans to provide written comments during the proceeding and participate in workshops when available. Participation by ENBALA in this proceeding will not prejudice any party, delay the schedule or broaden the scope of issues in this proceeding.

III. Service

Service of notice, orders, and other communications and correspondence in this proceeding should be direction to ENBALA at the address set forth below. Electronic correspondence will suffice:

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IV. Conclusion

For the reasons set forth above, ENBALA requests that the Commission grant ENBALA's motion for party status in R.10-12-007.

June 27, 2013 in North Vancouver, BC

Respectfully submitted,

By: /s/ Andy Gassner

Andy Gassner
Manager, Regulatory Affairs & Market Development
ENBALA Power Networks