

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  
FRIENDS OF THE EARTH**

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For Friends of the Earth

June 28, 2013

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Friends of the Earth (FoE) hereby moves to become a party in the above-captioned proceeding under Rules 1.4(a)(4) and (b) of the Commission’s Rules of Practice and Procedure.

**I. FOE’S INTEREST IN THIS PROCEEDING**

FoE’s interest in this proceeding is to advance the role of energy storage systems (ESS) in California’s energy future so that ESS, combined with renewable energy can become the “baseload” replacement for both fossil fuels and nuclear power.

FoE is a U.S. internal revenue code § 501(c)(3) non-profit organization that has worked for over forty years to reduce the dangers from nuclear energy and fossil fuels and promote renewable energy and efficiency technologies. FoE has played an important role before this commission in numerous proceeding—most recently in the OII investigation of the now closed San Onofre nuclear reactors. We now seek to play an equally important role in this proceeding, which can establish ESS as the vital partner with renewable energy and efficiency to replace nuclear power and fossil fuel generated power in California.

Over 2,000 members of FoE live in the state of California. FoE therefore has a direct interest in this proceeding, which will determine whether these members can enjoy a truly clean

air and safe energy future. Furthermore, this proceeding will set the pace for the advance of storage nationally and as a nation-wide organization, FoE can help assure that California's leadership is followed across the country.

If FoE's motion is granted, we intend to be an active participant that will enrich the proceeding with the testimony and perspective of a leading environmental organization with no financial interest in the outcome. Our participation will not prejudice any party nor will it expand the scope of the proceeding. FoE's participation will be pertinent to the issues that are under consideration by the Commission in this docket and will not cause any delay in the proceeding.

## **II. THE FACTUAL AND LEGAL CONTENTATIONS THAT FOE INTENDS TO MAKE IN THIS PROCEEDING ARE PERTINENT TO THE ISSUES ALREADY PRESENTED**

FoE holds that energy storage has the potential to transform how the California electric system is conceived, designed, and operated. We will contend that ESS can offer necessary services as California seeks to maximize the value of its generation and transmission investments and optimize the grid to avoid further investments in new fossil fuel-powered plants while integrating renewable power, and minimizing greenhouse gas emissions. FoE will contend that as a result of this proceeding the Commission should give the highest priority to an ESS-renewables-efficiency alternative to any proposed fossil fueled or nuclear fueled addition to the California power system. Only with such a firm policy will California be irrevocably embarked on the road to a 100% renewable, sustainable energy future.

## **III. SERVICE LIST**

FoE respectfully requests that the Commission list Damon Moglen as the FoE representative in this matter, with the following information:

Damon Moglen  
Friends of the Earth  
David Brower Center  
2150 Allston Way, Suite 240  
Berkeley, CA 94704  
Phone: 510-900-3150  
Fax: 510-900-3155  
[dmoglen@foe.org](mailto:dmoglen@foe.org)

To the extent that he is not currently listed on the service list, FoE respectfully requests that the Commission include S. David Freeman on the Service List as information only:

S. David Freeman  
c/o Friends of the Earth  
1100 15th Street, NW, 11th Floor  
Washington, DC 20005  
Phone: 310-902-2147  
[greencowboysdf@gmail.com](mailto:greencowboysdf@gmail.com)

#### IV. CONCLUSION

The Commission should grant FoE status as a party in this proceeding with all of the rights that attach thereto.

Respectfully Submitted,

A handwritten signature in black ink that reads "Damon Moglen". The signature is written in a cursive, flowing style.

Damon Moglen  
Friends of the Earth

June 28, 2013