

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
SUNVERGE ENERGY, INC.

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Director Regulatory & Energy
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June 21, 2013

June 28, 2013

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**MOTION FOR PARTY STATUS OF
THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC.**

The Interstate Renewable Energy Council, Inc. (IREC) 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.

Practice and Procedure

I. DESCRIPTION OF SUNVERGE.

I. IREC'S INTEREST IN THIS PROCEEDING

Sunverge is a manufacturer of distributed energy storage solutions (DESS). Our solutions optimize the value of solar power by leveraging the practical advantages of distributed generation and storage. Our energy management methodology for energy storage systems (ESS) and the June 10, 2013 Assigned Commissioner's Ruling (ACR) regarding ESS procurement targets for California utilities. IREC is a U.S. Internal Revenue Code § 501(c)(3) non-profit organization that enables greater use of clean energy in a sustainable way by (i) introducing regulatory policy innovations that empower consumers and support a transition to a sustainable energy future, (ii) removing technical constraints to distributed energy resource ("DER") integration, and (iii) developing and coordinating national strategies and policy guidance to provide consistency on these policies centered on best practices and solid research. The scope of IREC's work includes incorporating DER growth into utility planning and operations.

II. SUNVERGE'S INTEREST IN THIS PROCEEDING .

Sunverge's interest in this proceeding is related to the on-going development of a valuation methodology for DESS and the June 10, 2013 Assigned Commissioner's Ruling (ACR) regarding DESS procurement targets for distributed energy resource ("DER") integration, and (iii) developing and coordinating national strategies and policy guidance to provide consistency on these policies centered on best practices and solid research. The scope of IREC's work includes incorporating DER growth into utility planning and operations.

III. NOTICES.

An important link exists between distributed renewable generation and ESS, where the latter can help resolve the intermittent nature of the former and address some of the challenges of below. Electronic correspondence will suffice:

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IV. CONCLUSION.

This motion for party status is filed by Sunverge to provide insights from the Company's experience in the California energy storage market. Sunverge's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. By participating, Sunverge seeks to encourage policies that are technically sound, ensure the safety of the grid, and are administratively smooth. For the reasons stated above, Sunverge respectfully moves for a ruling that this motion for party status should be granted.

June 28, 2013 in Stockton, CA

Respectfully submitted,

Jon Fortune
Director of Regulatory & Energy
Services



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