

**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 AES ENERGY STORAGE, LLC
TO BECOME A PARTY**

AES Energy Storage, LLC

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I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the California Public Utility Commission’s (“CPUC” or “Commission”) Rules of Practice and Procedure, AES Energy Storage, LLC (“AES”) hereby moves to become a party in this proceeding.

II. BASIS FOR PARTY STATUS

A. AES’s Interest in the Proceeding.

AES is private developer, owner, and operator of energy storage projects in California, the United States, and abroad. AES is a subsidiary of The AES Corporation, a global power company with a diverse portfolio of distribution businesses as well as thermal and renewable generation facilities, including electrical generation facilities in California.

AES has 150 megawatts (“MW”) of energy storage systems online, the largest fleet of battery-based energy storage assets in commercial operation today. Currently, AES has over 1,000 MW of energy storage assets in development in the United States and abroad. In 2008, AES developed a 4 MW energy storage project in Huntington Beach, California, adjacent to an existing AES Corporation generating facility. AES energy storage assets can provide reserve and peak capacity, with additional benefits such as ancillary services.

AES has an interest in the effective implementation of AB 2514 in California. As the developer of energy storage projects in California and the affiliate of electrical generators in

California, AES has unique interests in the deployment of energy storage in California that cannot be represented by any other party in the proceeding.

At the invitation of CPUC Energy Division staff, AES presented at two workshops in this proceeding: the workshop on procurement policy options, which took place on January 14, 2013, and the joint workshop with Rulemaking 12-03-014 (Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans) on September 7, 2012. AES now wishes to participate formally in this proceeding as a party.

B. AES's Contentions in the Proceeding

AES will contribute its first-hand knowledge of the technical and business aspects of energy storage development to the proceeding. AES may file comments on the Assigned Commissioner's Ruling Proposing Storage Procurement Targets and Mechanisms and Noticing All-Party Meeting and other Motions, Rulings, and Proposed Decisions issued during the proceeding. AES's participation in this proceeding will not prejudice any other party to this proceeding, delay the schedule, or expand the scope of the issues to be considered.

III. SERVICE

Correspondence, pleadings, notices, orders and other communications in this proceeding should be addressed to the following:

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IV. CONCLUSION.

For the reasons set forth above, AES respectfully requests that the Commission grant this Motion To Become A Party.

DATED this 17 day of June, 2013, at Sacramento, California.

Respectfully submitted,

/s/

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