

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
THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC.**

Tim Lindl
Keyes, Fox & Wiedman LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Phone: 510.314.8201
Fax: 510.225.3848
tlindl@kfwlaw.com

Counsel to the
Interstate Renewable Energy Council, Inc.

June 21, 2013

**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
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.

I. IREC'S INTEREST IN THIS PROCEEDING

IREC's interest in this proceeding is related to the on-going development of a valuation 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 distribution system planning and operations.

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

accommodating higher penetrations of solar energy and other DERs. Over the past five years, IREC has worked in nearly 40 states to implement successful regulatory policies and programs that have greatly reduced barriers for DERs. IREC focuses on policies that directly impact customer access to renewable technologies, including ESS, net metering rules, community renewable power programs and interconnection procedures. IREC actively monitors and participates in ESS implementation efforts throughout the country, including those at the Federal Energy Regulatory Commission and the states of Texas and Hawaii.

II. THE FACTUAL AND LEGAL CONTENTIONS THAT IREC INTENDS TO MAKE IN THIS PROCEEDING ARE PERTINENT TO THE ISSUES ALREADY PRESENTED.

IREC's interest in achieving California's ambitious DER goals, and the proliferation of renewable DERs in general, makes it a valuable participant in this proceeding. Both the Order Instituting Rulemaking and the ACR recognize the important link between DERs and ESS.¹ IREC will contend that ESS is a reliable and cost-effective renewable integration strategy that can provide an alternative to the state's retiring fossil-fuel-fired resources. IREC will leverage its knowledge of state and federal storage policies to provide useful, nationally based insight into the Commission's consideration of challenges and solutions for deploying ESS in the state. IREC's objectivity and focus on best practices gives it a unique perspective that does not prejudge behind-the-meter, wholesale or utility-owned market mechanisms through which this deployment should take place. This perspective will assist the Commission in reducing the barriers to ESS development, calculating the costs and benefits of ESS, establishing the best manner in which to distribute those costs and benefits and determining appropriate procurement targets.

¹ Order Instituting Rulemaking 10-12-007, at 4 (December 16, 2010); Assigned Commissioner's Ruling, R.10-12-007, at 6-7 (June 10, 2013).

III. SERVICE LIST

IREC respectfully requests that the Commission list Tim Lindl as the IREC representative in this matter, with the following information:

Tim Lindl
Keyes, Fox & Wiedman LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Phone: 510.314.8201
Fax: 510.225.3848
tlindl@kfwlaw.com

IV. CONCLUSION

The Commission should grant IREC status as a party in this proceeding with all of the rights attached thereto.

Respectfully submitted,



Tim Lindl
Keyes, Fox & Wiedman LLP

Counsel to the
Interstate Renewable Energy Council, Inc.

June 21, 2013