

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Integrate and Refine
Procurement Policies and Consider Long -Term
Procurement Plans

Rulemaking 12-03-014
(Filed March 22, 2012)

**MOTION OF THE PROTECT OUR COMMUNITIES FOUNDATION FOR PARTY
STATUS**

David A. Pepper, Esq.
PROTECT OUR COMMUNITIES
FOUNDATION
4452 Park Boulevard, Suite 209
San Diego, CA 92116
david.a.pepper@gmail.com

July 26, 2013

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Integrate and Refine
Procurement Policies and Consider Long -Term
Procurement Plans

Rulemaking 12-03-014
(Filed March 22, 2012)

**MOTION OF THE PROTECT OUR COMMUNITIES FOUNDATION FOR PARTY
STATUS**

I. INTRODUCTION

Pursuant to Rules 1.4(b) and 11.1 Commission’s Rules of Practice and Procedure, the Protect Our Communities Foundation (“POC”) moves for party status in Rulemaking 12-03-014. POC seeks to participate in Track 4 of the proceeding, which is to consider the local reliability impacts of a potential long-term outage at the San Onofre Nuclear Power Station (SONGS) generators.

II. THE PROTECT OUR COMMUNITIES FOUNDATION

POC is a San Diego County based 501(c)(3) nonprofit dedicated to protecting the interests of small and medium-sized local communities in the face of large-scale industrial energy projects. POC also seeks to advance smart energy solutions and to protect the interests of ratepayers in local communities. POC has a history of active advocacy on behalf of ratepayers

and small and medium-sized communities in San Diego County whose voice might not otherwise be heard by utility decision-makers and regulators.

III. BASIS FOR INTERVENTION

POC seeks to intervene in Track 4 of this proceeding in order to address the local reliability impacts of the SONGS shutdown. POC intends to conduct a close analysis of the studies to be presented by CAISO and the Utilities, and plans on raising legal and factual contentions regarding issues raised by these studies, as appropriate. As POC's contentions will be based on these studies, POC's contentions will be reasonably pertinent to the issues already presented.

POC has a direct interest in this proceeding through its organizational purpose. The communities and ratepayers whose interests POC was formed to protect will be directly impacted by SDG&E's local capacity procurement, which will be determined in this proceeding. SDG&E's LCR calculation and resulting generation procurement affects local communities and ratepayers both physically – through the impact of construction and environmental impacts – and financially. For example, SDG&E has stated in its most recent customer billing insert that the capacity cost of its proposed contract for the 300 MW Pio Pico plant, justified in part on the permanent closure of SONGS, will be \$1.634 billion dollars and will increase rates by approximately 2 percent across the board. POC seeks to participate in the instant proceeding to advocate for an accurate LCR and responsible local capacity procurement that avoids unnecessary, duplicative, or economically imprudent capacity procurement, and instead focuses on efficiency and smart energy solutions.

