

**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 GRAVITY POWER, LLC

Gravity Power, LLC
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Dated: July 1, 2013

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I. INTRODUCTION

Pursuant to Rules 1.4(b) and 11.1 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Gravity Power, LLC respectfully moves for party status in the above captioned proceeding. This Rulemaking was opened in response to the enactment of legislation (Assembly Bill (AB) 2514 – Skinner, Stats. 2010 – ch. 469) which directed the Commission to determine appropriate targets, if any, for each load-serving entity (LSE) to procure viable and cost-effective energy storage.¹ The Commission views the Rulemaking “as an important opportunity for this Commission to continue its rational implementation of advanced sustainable energy technologies and the integration of intermittent resources in our electricity grid.”²

II. IDENTITY OF GRAVITY POWER, LLC AND BASIS FOR THE INTERVENTION

Based in Goleta, California and with previous venture capital funding support, Gravity Power, LLC (GP) is developing a bulk electricity storage system called the Gravity Power Module (GPM), which hydraulically lifts a large mechanical piston housed in an underground power shaft. The GPM system uses a Francis type pump/turbine and motor/generator identical to

¹ Order Instituting Rulemaking, 10-12-007 (December 21, 2010), p.1

² *Id.*

those used in “classical” pumped storage hydropower plants but is modular in design and much more flexibly sited than any classical pumped storage systems.

Citing Pub. Util. Code § 2835(a)(2)(B), this CPUC rulemaking says that for Reverse Auction Eligibility, all third-party owned energy storage resources as defined by law, except for pumped hydrological resources, would be eligible to bid into the energy storage reverse auctions.

GP believes that the CPUC’s intent is that “classical” pumped storage hydrological resources are a mature technology and do not face the same market barriers as newer technologies.

GP’s concern is that its newly patented GPM technology could be excluded from the Reverse Auction procurement process if it is classified as a “classical” pumped hydrological resource.

In furtherance to its public comments made at the CPUC All-Party meeting on this Proceeding on June 25, 2013, GP intends to submit written comments as invited by the CPUC which further expand upon its Intervention position by July 3, 2013.

III. SERVICE

For the purpose of receipt of all correspondence, pleadings, orders and notices in this Proceeding, the following Gravity Power, LLC representative should be placed on the service list as a “party”:

Thomas R. Mason
CEO/President
Gravity Power LLC
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In addition, the following Gravity Power LLC representative should be placed on the service list under the “information only” designation:

Christopher Grieco
Executive Vice President
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IV. CONCLUSION

Gravity Power LLC respectfully requests that the Commission grant this motion for party status.

Respectfully submitted this July 1, 2013, at Goleta, California.

GRAVITY POWER, LLC, a California limited liability company

By: /s/ Thomas R. Mason
Name: Thomas R. Mason
Title: CEO/President