

**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 15, 2010)

**MOTION FOR PARTY STATUS OF
PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY**

I. INTRODUCTION

Pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utility Commission's ("Commission") Rules of Practice and Procedure, the Public Utility District No. 1 of Snohomish County ("Snohomish PUD") respectfully files this motion for party status in the above-captioned docket, R.10-12-007.

II. BASIS FOR PARTY STATUS

A. Description of Snohomish PUD

Snohomish PUD is a municipal corporation and special purpose district of the State of Washington, established as a result of a popular vote in 1936. It is the largest public utility district and the second largest consumer owned utility in the State of Washington, serving 2200 square miles and approximately 330,000 electric customers. Snohomish PUD is locally governed by a three-member Board of Commissioners, each of whom is elected from a separate commissioner district within the utility's boundaries.

B. Snohomish PUD's Interest in the Proceeding

Snohomish PUD adopted a policy in 2007 committing it to meeting future growth solely through conservation and renewable energy sources, on top of an energy resource portfolio that is essentially carbon free (except for small market purchases for load-resource balancing), which includes eight percent wind energy. Snohomish PUD has become recognized as a leader and innovator in energy efficiency and renewable energy: it anticipates receiving its Federal Energy Regulatory Commission license within the next six months for the first grid-connected tidal energy array in North America for its Admiralty Inlet Tidal Pilot Project; it has been active in exploration for local geothermal energy sources; and it is actively developing low impact hydroelectric resources within its service territory, including completion of the first, new hydroelectric project built in the State of Washington in 20 years.

Snohomish PUD also facilitates the development of distributed generation within its service area, with an adopted “small renewables” program to support such development; and has one of the most successful incentive programs for the development of distributed solar resources in the State.

One of Snohomish PUD's more important efforts is its partnership with 1Energy Systems, Inc. (“1Energy”) to develop, build and operate an energy storage system built on an innovative Modular Energy Storage Architecture. A primary goal of this system is to overcome one of the principal barriers to energy storage, which is the lack of electrical, physical and communication standards that are open and non-proprietary, modular and scalable.

The nature and extent of regulations implemented pursuant to this proceeding will directly affect Snohomish PUD's usage of energy storage in operating its electric system. As a

result, Snohomish PUD has a direct and substantial interest in this proceeding that cannot be represented by any other party. Snohomish PUD's participation in this proceeding will not prejudice any other party, delay the proceeding, or unduly expand its scope.

III. SERVICE

Communications to Snohomish PUD may be directed to:

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IV. CONCLUSION

For the foregoing reasons, Snohomish PUD respectfully requests party status in this proceeding.

Respectfully Submitted,

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