

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

Order Instituting Rulemaking to Oversee  
the Resource Adequacy Program, Consider  
Program Refinements, and Establish  
Annual Local Procurement Obligations

Rulemaking R-11-10-023

**MOTION OF THE GREEN POWER INSTITUTE  
FOR PARTY STATUS**

August 20, 2013

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**MOTION OF THE GREEN POWER INSTITUTE  
FOR PARTY STATUS**

Pursuant to Rules 1.4 and 11.1 of the Commission's Rules of Practice and Procedure, in Rulemaking R.11-10-023, the **Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations**, the Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment and Security, respectfully petitions for Party status in the Resource Adequacy (RA) proceeding.

The Pacific Institute for Studies in Development, Environment and Security is a not-for-profit 501(c)(3) public interest environmental research institution, formed in 1987, with over 25 professional staff involved in various areas of environmental research and advocacy. The Green Power Institute is the Pacific Institute's renewable energy program. The GPI has been an active participant in CPUC proceedings for more than a decade. Our interest is focused on renewable energy. We have participated in all of the Commission's RPS proceedings, as well as the LTPP and other related proceedings.

With the recent issuance of D.13-06-024 in this proceeding, the Commission has created a new category of resource for purposes of RA accounting, which is designated flexible capacity. As specified in the August 2, 2013, *Scoping Memo and Ruling*, the next phase of the proceeding, among other matters, will be establishing the definitions and rules for flexible capacity, which are scheduled to go into effect in the 2015 calendar year. The GPI is interested in participating in the RA proceeding on the issue of flexible capacity, with a focus on developing the definitions and rules for flexible-capacity resources as they relate to renewable-generating resources. Some of the baseload renewables are capable of operating as flexible resources if the proper incentives and rules are developed.

We intend to advocate on behalf of the interests of renewables that are capable of providing flexible capacity services, in order to make sure that the rules enacted provide for fair treatment of renewables, and proper incorporation of the state's loading order.

Service of Notices, Orders, and other pleadings in the proceeding should be directed to Dr. Gregg Morris, director of the Green Power Institute, at the following address:

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GPI's participation in this proceeding will not prejudice any party, and will not delay the schedule or broaden the scope of the issues in the proceeding. For these reasons, the GPI respectfully requests that it be granted Party status in R.11-10-023, the RA proceeding. Party status will permit the GPI to file comments, testimony, and briefs on the issue of the flexible capacity value of renewable resources, and various related issues.

Dated August 20, 2013, at Berkeley, California.

Respectfully Submitted,



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