# 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 CITY OF REDONDO BEACH FOR PARTY STATUS

Michael W. Webb CITY ATTORNEY CITY OF REDONDO BEACH 415 Diamond Street Redondo Beach, CA 90277

Lisa Bond RICHARDS WATSON GERSHON 355 S. Grand Avenue 40<sup>th</sup> Floor Los Angeles, CA 90071

Attorneys for City of Redondo Beach

August 23, 2013

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# I. INTRODUCTION

Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, the City of Redondo Beach ("City") respectfully moves for party status in the above-captioned proceeding. The City seeks to participate in this proceeding involving consideration of the local reliability impacts of a long-term outage of the San Onofre Nuclear Generating Station (SONGS).

#### II. IDENTITY OF THE CITY AND BASIS FOR INTERVENTION

The City is a Los Angeles County Charter City in which the AES Redondo Beach
Generating Station is located. The City seeks to participate in this proceeding in order to address
the local reliability impacts of the SONGS shutdown. The City conducted a study with
Advanced Energy Solutions, a consulting firm unrelated to the AES entity that owns the
Redondo Beach Generating Station, resulting in a June 2013 report entitled "Analysis of Local
Capacity Requirements in the Western Los Angeles (LA) Basin Sub-Area: Study of an
Environmentally Superior Alternative to Proposed New Generation at the Redondo Beach
Generating Station for Meeting Local Capacity Requirements in the Western LA Basin SubArea." The City wishes for this report to be considered in connection with this proceeding. The
City may also wish to raise legal or factual contentions related to the studies presented by the
California Independent System Operator and others. Because the City's contentions will be
based on these studies, the City's contentions will be reasonably pertinent to the issues already
presented in the proceeding.

Granting the City party status will not prejudice any party and will not delay or disrupt any aspect of this proceeding.

#### III. SERVICE

The City requests to be added to the service list for this proceeding as follows:

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# IV. CONCLUSION

For the foregoing reasons, the City respectfully requests that the Commission expedite its determination as to this motion and grant the City party status.

Dated: August 23, 2013 Respectfully Submitted,

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Lisa Bond RICHARDS WATSON GERSHON 355 S. Grand Avenue, 40<sup>th</sup> Floor Los Angeles, CA 90071 Attorneys for City of Redondo Beach