

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)

Clean Coalition Motion to Late-File Notice of Intent to Claim Intervenor Compensation

Dyana Delfin-Polk  
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September 25<sup>th</sup>, 2012

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**I. INTRODUCTION**

Pursuant to Rule 11.6 of the California Public Utilities Commission Rules of Practice and Procedure, the Clean Coalition respectfully submits this motion seeking permission to late-file its Notice of Intent (“NOI”) to claim intervenor compensation.

**II. BACKGROUND**

As stated in our Motion for Party Status (filed June 4<sup>th</sup>, 2012), the Clean Coalition is a California-based group that advocates for vigorous expansion of the Wholesale Distributed Generation (WDG) market segment, which is comprised of renewable energy generation that connects to the distribution grid and serves local load. Since penetrations of WDG above about 20% require local balancing of supply and demand of energy, the Clean Coalition not only drives policy innovation that removes the top barriers to WDG (procurement and interconnection), but also drives policy innovations that will allow private capital to deploy Intelligent Grid (IG) solutions like demand response and energy storage. The Clean Coalition is active in proceedings at the California Public Utilities Commission, the Federal Energy Regulatory Commission, and related federal and state agencies throughout the United States. The Clean Coalition also designs and implements WDG and IG programs for local utilities and governments around the country.

Long Term Procurement Planning (LTPP) has long been a policy platform of the Clean Coalition, with the specific goal of ensuring that LTPP reflects a long-term plan for the major deployment of WDG projects in addition to IOU capital expenditures for distribution grid upgrades being allocated to facilitate full deployment of WDG. We also remain committed to

ensuring that the 33% renewable portfolio standards (RPS) goals for California are included in LTPP. Not only has the Clean Coalition been active in the 2012 LTPP proceeding, but was also involved in the 2010 LTPP proceeding.

### **III. Reason for a Late Filed NOI**

The Clean Coalition has been an active party in the LTPP proceeding since June 4<sup>th</sup>, 2012. Clean Coalition's staff members were given incorrect information regarding our intervenor compensation status, which is labeled as "Attachment A." In short, we were told that our intervenor compensation status in the 2010 LTPP proceeding would carry-over into the 2012 LTPP proceeding and that a new NOI would not be necessary, assuming our status as an organization did not change. However, on Wednesday, September 19<sup>th</sup>, ALJ Gamson corrected this information and directed the Clean Coalition staff to submit a motion to late file an NOI/NOI for the 2012 LTPP proceeding. If we had been given the correct information as we intervened, this NOI would have been filed June 15<sup>th</sup>, 2012.

The Clean Coalition has been heavily active in the LTPP proceeding since we intervened on June 4<sup>th</sup>, 2012. The Clean Coalition is participating in both Track 1 and Track 2 matters, which include involvement in the Track 1 evidentiary hearings, submission of comments on proposed scenarios and collaboration with other parties to avoid undue duplication and plans to address matters in Track 3 as it is appropriate.

The Clean Coalition will continue to be active in LTPP and will continue to urge the Commission to consider the issues we have been advocating for in this proceeding.

### **IV. Conclusion**

For the reasons stated herein, the Clean Coalition respectfully requests that the Commission grant its Motion to Late-File NOI for Intervenor Compensation in this proceeding. The Clean Coalition does not believe allowing the late-filing of its NOI will in any way disadvantage the other parties or be disruptive to the schedule of the proceeding.

Respectfully submitted,

/s/Dyana Delfin-Polk  
Dyana Delfin-Polk  
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Dated: September 25<sup>th</sup>, 2012

**Attachment A**



Dyana Delfin-Polk <dyana@clean-coalition.org>

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**Question Regarding Intervenor Comp**

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**Icompcoordinator** <icompcoordinator@cpuc.ca.gov>

Fri, Jun 15, 2012 at 2:26  
PM

To: Dyana Delfin-Polk <dyana@clean-coalition.org>  
Cc: "Gamson, David M." <david.gamson@cpuc.ca.gov>

Dear Dyana Delfin-Polk,

No, you do not need to submit a new NOI in R12-03-014 (assuming your status has not changed). A ruling of July 19, 2011, in R10-05-006 found your organization eligible to claim intervenor compensation.

Regards,

*Maria Vengerova*

*Legal Analyst*

*CPUC Intervenor Compensation Program*

*Telephone: (415) 355-5574*

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