

**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.

R.12-03-014
(Filed March 22, 2012)

**MOTION FOR PARTY STATUS OF THE SAN DIEGO ENERGY DISTRICT
FOUNDATION**

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September 5, 2013

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District Foundation

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I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the San Diego Energy District Foundation ("SDED") respectfully submits a motion for party status. SDED seeks to participate in Track 4 of the Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans (R.12-03-014) (the "LTPP Proceeding").

II. BACKGROUND

SDED is a nonprofit organization whose mission, according to its bylaws, is "to promote competition, affordability and environmental responsibility in the energy industry." The organization's purposes and objectives are, in short, to educate the public about alternative energy programs; to advance research and development of renewable energy and related technology; to support economic and public policy research consistent with the organization's mission; to provide services that support the economic sustainability of renewable energy; and to

represent utility customers before government and regulatory bodies. SDED’s supporters include hundreds of customers within San Diego Gas & Electric’s (“SDG&E”) service territory.

To realize the organization’s purposes, SDED seeks a level playing field for renewable energy buyers and suppliers. SDED supports the creation of Community Choice Aggregation (“CCA”) programs serving San Diego and Orange counties and other renewable energy initiatives.

III. GROUNDS FOR INTERVENTION

Generally speaking, the LTPP Proceeding raises important issues that affect the procurement of renewable energy. As the Commission explained in its Order Instituting Rulemaking (“OIR”), integration of renewable resources and meeting greenhouse gas reduction limits are primary drivers for any need for new resources identified in the proceeding.¹ However, maintaining local reliability is also a key consideration in long-term procurement.² As an organization dedicated to advancing renewable energy, SDED seeks to inform the Commission’s decision-making on these issues.

SDED is also concerned about the effect of a power plant closure in its own backyard. Track 4 of the proceeding is designed to address the “local reliability impacts of a potential long-term outage at the San Onofre Nuclear Power Station (SONGS) generators”³ The Commission anticipates that Track 4 will guide local capacity requirements with and without San

¹ Order Instituting Rulemaking (R.12-03-014), p.7.

² Order Instituting Rulemaking (R.12-03-014), p.7.

³ Revised Scoping Ruling and Memo of the Assigned Commissioner and Administrative Law Judge (R.12-03-014), p. 4.

Onofre.⁴ Those requirements will serve as a framework to determine what generation resources are built and procured in the San Diego area in the future, renewable or otherwise. Subsequent proceedings will draw on the Commission's decision in Track 4 to determine whether local reliability needs justify the construction of natural gas plants and other carbon-emitting generation resources. Accordingly, the effect of the proposed closure of San Onofre is of great interest to SDED, and the organization looks forward to sharing its perspective.

IV. SERVICE

All correspondence, pleadings, notices, orders and other communications in this proceeding should be addressed as follows:

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V. CONCLUSION

For the reasons stated above, SDED has a significant interest in the outcome of the proposed rulemaking and requests that it be granted party status.

Respectfully submitted on behalf of the San
Diego Energy District Foundation, pursuant
to Rule 1.8(d).

⁴ Revised Scoping Ruling and Memo of the Assigned Commissioner and Administrative Law Judge (R.12-03-014), p. 4.

/S/ Ty Tosdal

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