

**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 FOR PARTY STATUS OF ALTON ENERGY, INC.**

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September 30, 2013

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Alton Energy, Inc., a California Corporation (“Alton Energy”), is a developer and member of the Bison Peak Pumped Storage Project, a closed loop pumped hydro storage project to be located in and electrically interconnected in Kern County, California. Alton Energy respectfully moves for Party Status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission Rules of Practice and Procedure.

**I. ALTON ENERGY, INC. INTEREST IN THIS PROCEEDING.**

This Motion for Party Status is filed in order to enable Alton Energy, Inc. (“Alton Energy”) to file comments that are currently lodged with the Commission’s Docket Office pending a ruling granting this Motion for Party Status, in response to *Assigned Commissioner and Administrative Law Judge’s Ruling Regarding Track 2 and Track 4 Schedules*, issued September 9, 2013 (“ALJ’s Ruling”), and otherwise participate as an active party in this proceeding. Alton Energy’s Comments on the ALJ’s Ruling relate directly to potential significant impact that the issues discussed therein may have on Alton Energy’s ability to do business in California. Alton Energy has unique interests that are not adequately represented by any party to this proceeding, and can help address and provide insight into the best and most

cost-effective solutions for meeting the objectives of this proceeding, along with State Policies and Goals.

Alton Energy is an active party, with substantial participation in the Commission's Energy Storage Rulemaking Proceeding, R.10-12-007. In the Proposed Decision in that proceeding, issued on September 3, 2013, the resolution of large pumped hydro storage procurements is being deferred from that proceeding to this LTPP proceeding and other proceedings. Therefore, it is necessary for Alton Energy to become an active party in this proceeding to continue and complete the work it has actively participated in in R.10-12-007. Alton Energy believes it can timely become an active party in this proceeding at this time without delaying this proceeding, and will provide valuable contribution to the goals of this proceeding along with enhancing the cost effective achievement of state policies and goals in the most efficient manner.

The Alton Energy team has many years of wind energy and energy storage project development experience, as well as substantial experience in effective utilization of the transmission grid. The founding partners were the originating developers of the Alta Energy Center in Tehachapi, now at over 1,320 MW wind installed successful operating capacity, with anticipated full and timely completion of nearly 1,550 MW later this year. They were heavily involved with facilitating the development of the 4,500 MW Tehachapi Renewable Transmission Project, which is bringing substantial renewable energy onto the CAISO grid near the LA Basin from the Tehachapi Area, and is now the location of the Bison Peak Pumped Storage Project. Alton Energy believes it can contribute substantially to the goals of this proceeding from their successful history and experience in regulatory process with the CPUC, CAISO, and FERC, as well as significant policy and successful clean energy project development experience. This team was the primary non-IOU, non-ISO active party in the portion of the Transmission

proceeding that built the Record that supported the initial decisions that moved Tehachapi Transmission forward at the CPUC.

Bison Peak Pumped Storage Project has received its approved FERC Preliminary Permit for 1000 MW of capacity, and is in advanced preliminary development stage. Alton Energy is an active member of Bison Peak Pumped Storage, LLC. Bison Peak Pumped Storage Project is located in Kern County, California, between Whirlwind Substation and Windhub Substation, strategically located in the Tehachapi Renewable Transmission Project Area.

The Proposed Project is a large utility-scale bulk energy storage project that will provide electrical generation, capacity, ancillary benefits, fast ramping, frequency response and other valuable system and transmission benefits to the electric system in probably the most cost effective manner, and with significant potential to facilitate the achievement of GHG Emissions goals as established by ARB. The project is strategically located in the center of many thousands of megawatts of renewable variable generation resources in the Tehachapi Region, near extra high-voltage transmission, adjacent to the LA Basin, and close to paths serving Northern California. Bison Peak Pumped Storage, combined with strategic smart transmission expansion of the type being suggested in this proceeding by some parties, if properly arranged, is likely to contribute to some of the most cost effective and most GHG friendly solutions here.

Bison Peak Pumped Storage Project is a closed-loop pumped hydro storage facility, with the ability to store a large quantity of off-peak low cost energy, and dispatch on demand to generate fast response on-peak energy and other benefits at times of highest system value. The Project will utilize proven and reliable variable speed hydro turbines to provide ternary technology with very fast ramping capability. The Project will be able to maximize the value of the large volume of intermittent renewable energy in the Tehachapi Area, increase the utilization of the most efficient gas generators on the margin during time of charging need, and displace

large quantities of otherwise dispatched high polluting peaker plants during on-peak hours. The Project, through strategic and efficient dispatch, will ultimately help to improve the efficiency of the electric grid, and lower rates to ratepayers. Bison Peak Pumped Storage Project has an approved FERC Preliminary Permit for 1,000 MW of installed capacity, has a head of ~ 2,500 vertical feet, and will have a storage reservoir capacity capable of ~11,000 MWh.

## II. NOTICES.

Services of notices, orders and other communications and correspondence in this proceeding should be directed to the address below:

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## III. CONCLUSION.

Alton Energy's participation in this proceeding will not prejudice any party, delay the schedule, nor broaden the scope of issues in the proceeding. For the reasons set forth herein, Alton Energy respectfully requests that the Commission grant this Motion for Party Status.

Respectfully submitted,

/s/

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Date: September 30, 2013