

**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 11-10-023
(Filed October 20, 2011)

MOTION OF ENVIRONMENTAL DEFENSE FUND FOR PARTY STATUS

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Dated: October 11, 2013

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I. INTRODUCTION

Pursuant to Rules 1.4 and 11.1 of the Commission's Rules of Practice and Procedure, Environmental Defense Fund, Inc. (EDF) respectfully moves for party status in this proceeding.

II. DISCUSSION

EDF is a leading non-profit organization representing more than 320,000 members across the country, including over 55,000 in California. Since 1967, EDF has linked science, economics, law, and innovative private-sector partnerships to create breakthrough solutions to the most serious environmental problems. EDF has been active in California on environmental issues since the 1970's, and has participated in proceedings on energy-related topics at the California Public Utilities Commission since 1976. EDF has interest and expertise in the role that market-based approaches can play in achieving positive environmental outcomes, an approach that is particularly salient in the field of energy regulation.

EDF is involved in pilots and dockets addressing clean energy issues – including but not limited to electrical consumer behavior and demand response (DR) – in California and other states. In California, EDF is working on a pilot project, the Demand Response Pilot Partnership, in collaboration with Southern California Edison (SCE), Lawrence Berkeley National Laboratory (LBNL) Demand Response Research Center, and the US Green Building Council to demonstrate the ability of automated DR in large LEED-certified buildings to build reliable capacity. EDF has expertise in and has or is currently participating in other proceedings at this Commission related to treatment of demand response, smart grids, electricity rates, alternative vehicles and energy storage. EDF is therefore well suited to address the implementation of the flexible capacity framework and the requirements of the loading order, AB 32, the Renewable Portfolio Standard, and other California energy and environmental policies.

EDF seeks to participate in Phase 3, which considers issues related to implementation of the flexible capacity framework in RA compliance year 2015, including determining the availability of flexible resources and the operating characteristics of those resources. EDF will support the implementation of the state's loading order: the utilization of energy efficiency, demand response, and renewables to cost-effectively meet reliability needs. While EDF will not be alone in this endeavor, EDF's unique and significant contribution will be our focus on enhanced demand response programs that play a role in meeting system needs by robustly reducing and shifting energy usage. Based on our experience in California and across the country, we will have specific suggestions for availability and characteristics of flexible resources in

2015.

EDF seeks party status on its own behalf, as a non-profit environmental advocacy organization with a long history of representing the interests of, *inter alia*, residential and small commercial customers served by Pacific Gas & Electric (PG&E), San Diego Gas & Electric (SDG&E) and SCE. These residential and commercial customers have an interest in RA because a decision will likely directly influence the carbon and air pollution profile (as well as price) of the energy they will receive. The outcome of this proceeding can therefore have dramatic health and environment consequences both at the local and regional scale, as well as impact rates for electric service rates within the SCE service territory. Accordingly, EDF's 55,000 plus members in California, many of whom are served by PG&E, SDG&E and SCE, will be well served by our participation.

III. SERVICE

Services of notices, orders, and other communications and correspondence in this proceeding should be directed to EDF at the address set forth below.

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IV. CONCLUSION

EDF'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. EDF will attend the workshop on October 15th and will also submit comments related to flexible capacity

issues by October 22nd, though reserves the right to submit timely discovery requests that conform to the Commission's rules relating to such. For the reasons stated above, Environmental Defense Fund respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on October 11, 2013.

ENVIRONMENTAL DEFENSE FUND

/s/

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