

**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 No. 12-03-014

(Filed March 22, 2012)

**MOTION OF CALPEAK POWER, LLC
FOR PARTY STATUS**

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October 22, 2013

Pursuant to Rule 1.4(a)(4) and Rule 11.1(b) of the Commission’s Rules of Practice and Procedure, CalPeak Power, LLC (“CalPeak”) hereby moves to become a party in the above-referenced proceeding.

I. BACKGROUND

CalPeak owns four flexible natural gas-fired simple cycle generation units (nominally 50 megawatts each) which are also capable of providing voltage support to the California Independent System Operator (“CAISO”) controlled grid as synchronous condensers. These units are the CalPeak Power Border Unit 1 located in San Diego at the San Diego Gas and Electric (“SDG&E”) Border 69 kV Substation, the CalPeak Power Enterprise Unit 1 located in Escondido at the SDG&E Escondido 69 kV Substation, the CalPeak Power Panoche Unit 1 located in Fresno County at the Pacific Gas and Electric (“PG&E”) Panoche 115 KV Substation, and the CalPeak Power Vaca Dixon Unit 1 located in Vacaville at the PG&E Vaca Dixon 115 kV Substation (collectively “CalPeak Units”).

II. CALPEAK’S INTEREST IN THE PROCEEDING

CalPeak is currently considering converting one or more of the CalPeak Units into synchronous condensers in order to help fill the MVAR void left by the SONGS shutdown. CalPeak’s decision will be based in part on how the Commission addresses the need for voltage support services in SDG&E’s service territory as part of Track 4 of this Long Term Procurement Plan Proceeding addressing local procurement after SONGS.

Several parties, including the Office of Ratepayer Advocates, the California Environmental Justice Alliance, the Sierra Club, AES Southland, and the Natural Resources Defense Council, have submitted testimony and comments addressing the role of synchronous condensers as part of a post-SONGS mitigation solution. These parties have already introduced into the record of this proceeding issues which affect CalPeak’s interests, including the

advantages and disadvantages of synchronous condensers, the role synchronous condensers may play in ensuring grid reliability in the post-SONGS electric grid, and whether and how existing units in SDG&E's territory should be converted into synchronous condensers.

As a leading independent power producer with at least two assets that are well located to provide much needed voltage support in SDG&E's service territory, CalPeak not only has a strong interest in the outcome of these proceedings, but also can provide valuable perspective on the viability of making use of existing generation as synchronous condensers.

CalPeak acknowledges that the window for filing opening and reply testimony in this proceeding has passed, and has no intent to present witnesses at the evidentiary hearings scheduled for later this month. Accordingly, CalPeak's participation in this proceeding should not prejudice any party, delay the schedule, nor broaden the proceeding's scope. Accordingly, CalPeak requests that it be accorded full party status.

III. COMMUNICATIONS

Communications in this matter should be directed to:

Service List Category: Party
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IV. CONCLUSION

For the foregoing reasons, CalPeak requests that it be accorded full party status in this proceeding.

Respectfully submitted,

By: /s/ Clifford D. Evans, Jr.

Clifford D. Evans, Jr.

Vice President

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