

**BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Alternative-Fueled Vehicle Programs, Tariffs, and
Policies.

Rulemaking 13-11-007
(Filed November 14, 2013)

MOTION OF ENVIRONMENTAL DEFENSE FUND FOR PARTY STATUS

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Dated: February 20, 2014

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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 – in California and other states. In California, EDF is working on a pilot project, the Demand Response Pilot Partnership, in collaboration with SCE, Lawrence Berkeley National Laboratory (LBNL) Demand Response Research Center, and 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, and energy storage. EDF is therefore well suited to address the penetration of electric vehicles (“EV”) in the market via the two tracks identified in the Order Instituting Rulemaking: 1) the potential and value of vehicle-grid integration, including the use of batteries for demand response or energy storage; and 2) the development of new tariffs for alternative fuel vehicles (“AFV”) in each of the investor-owned utility (IOU) territories.

EDF seeks to participate in both tracks of the proceeding. EDF seeks to ensure that increased penetration of AFVs into the market minimizes any adverse consequences. Because the electricity that powers these vehicles often comes from natural-gas fired and nuclear power plants, both sources of which are rife with negative environmental impacts, the well-to-wheel emissions - while less than vehicles that use fossil fuels - remains very high. Thus, the maximum feasible use of renewable sources of energy should be encouraged. In addition, EVs need to be integrated into the grid effectively, without overburdening or affecting the stability of the grid. If EVs are charged at times

of peak demand, load could exceed grid capacity and result in unintentional brown-outs and black-outs. In order to avoid this, EDF supports rate design and tariffs for EVs that incentivize utilizing charging stations at off-peak hours. In addition, exploring the use of EV batteries as storage systems could reduce the ramping up of energy load in the evening that is currently necessary – thus, researching the use of such technology and any safety or policy issues that are associated with its use will be an important consideration.

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 PG&E, SDG&E and SCE. These residential and commercial customers have an interest in AFV penetration and grid integration because a decision will likely directly influence the carbon and air pollution profile (as well as price) of the energy they will receive. 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 Pre-hearing Conference on February 26th and submitted comments on February 19th. EDF reserves the right to submit timely discovery requests that conform to the Commission's rules relating to the issues identified. For the reasons stated above, Environmental Defense Fund respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on February 20, 2014.

ENVIRONMENTAL DEFENSE FUND

/s/

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