

**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

R.11-10-023

**MOTION FOR PARTY STATUS
OF THE ENERGY PRODUCERS AND USERS COALITION**

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Users Coalition

March 21, 2014

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Pursuant to Rule 1.4(a)(4) of the California Public Utilities Commission (CPUC) rules of practice and procedure, the Energy Producers and Users Coalition (EPUC) requests party status in the above proceeding.

I. COMMUNICATIONS

Communications and correspondence regarding this proceeding should be directed to the following individuals:

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II. DESCRIPTION OF PARTY

EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, Chevron U.S.A. Inc., ExxonMobil Power and Gas Services Inc., Phillips 66 Company, Shell Oil Products US, Tesoro Refining & Marketing Company LLC, THUMS

Long Beach Company, and Occidental Elk Hills, Inc. EPUC accordingly regularly participates in various utility applications and Commission proceedings, including those involving direct access charges and processes.

III. STATEMENT OF INTEREST

EPUC's members may provide capacity pursuant to their PPAs that the Buyers may use to satisfy resource adequacy obligations. In that role, EPUC's members are directly impacted by decisions in this proceeding setting the rules by which resource adequacy capacity is measured and procured. EPUC is particularly impacted by the current issues in this proceeding raised by Staff's proposal as to how CHP capacity from other TAC areas may be treated for RA purposes, and the proposal to require CHP capacity to be treated as flexible capacity.

IV. STATEMENT OF INTENDED CONTENTIONS

EPUC will advocate the interests of CHP resources as they may be impacted by proposals in this proceeding, particularly the staff proposals regarding treatment of CHP for RA and flexible capacity purposes. EPUC may present evidence or argument as to the impact of these proposals on the value of CHP capacity, and the characteristics of CHP operation that may impact its use as flexible capacity.

V. CONCLUSION

EPUC requests that it be granted status as a party in this proceeding, with full rights to present evidence and argument as proceedings may permit.

Respectfully submitted,

A handwritten signature in black ink that reads "Donald Brookhyser". The signature is written in a cursive style and is positioned above the printed name.

Donald Brookhyser

Counsel to the Energy Producers and
Users Coalition

March 21, 2014