

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

Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the
California Solar Initiative, the Self-Generation
Incentive Program and Other Distributed
Generation Issues

Rulemaking 12-11-005
(Filed November 8, 2012)

**MOTION FOR PARTY STATUS BY
WESTERN MUNICIPAL WATER DISTRICT**

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Dated: June 5, 2014

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I. INTRODUCTION

During the recently concluded rulemaking to establish a net energy metering (NEM) transition period as required by AB 327, Western Municipal Water District (WMWD) filed Reply Comments on December 23, 2013, Response to Information Submitted with Reply Comments on January 6, 2014, Opening Comments on the Proposed Decision on March 12, 2014, and Reply Comments on the Proposed Decision on March 17, 2014. WMWD filed these documents along with the City of Benicia, Lemon Grove School District, NLine Energy, Padre Dam Municipal Water District, Rancho California Water District, San Diego Unified School District, TerraVerde Renewable Partners and Valley Center Municipal Water District (collectively, the Net-Energy Metering Public Agency Coalition or NEM-PAC).

Although the Commission initially accepted the Reply Comments and Reply Comments on the Proposed Decision documents for filing¹, on June 2, 2014, the Commission's Docketing Office advised WMWD that it had determined that WMWD's filing of the above documents did not make it a party to the above proceeding under Rules of Practice and Procedure of the California Public Utilities Commission (RPP), Rule 1.4(a)(2)(ii) as "comments" in that section are limited to opening comments. The Docketing Office advised WMWD that it can cure this by filing this Motion for Party Status (Motion) retroactively making WMWD a party to the proceeding on the date of NEM-PAC's Reply Comments or December 23, 2013.

II. WMWD RESPECTFULLY REQUESTS PARTY STATUS UNDER RPP 1.4

Pursuant to RPP, Rules 1.4 and 11.1, WMWD hereby moves to become a party to the above-captioned proceeding. WMWD further requests that its party status be retroactive to December 23, 2013.

III. INTEREST IN THIS PROCEEDING

WMWD seeks party status in the above-captioned proceeding as it is a customer affected by the length of the NEM transition period. Similar to the other local agencies in the NEM-PAC, WMWD invested heavily in solar photovoltaic (PV) to mitigate energy costs. WMWD provides water on both a wholesale and a retail basis to a region stretching 527-square miles in western Riverside County with a population of more than 880,000 people. This regional area includes the cities of Corona, Norco and Riverside and the water agencies serving Box Springs, Eagle Valley, Lake Elsinore, Lee Lake and Temecula. WMWD also provides wastewater services to portions of its service area. WMWD's investments in solar PV ensure that it can keep wholesale and retail water and wastewater rates as low as possible.

As set forth in the NEM-PAC's Reply Comments, Response to Information Submitted with Reply Comments, Opening Comments on the Proposed Decision and Reply Comments on the Proposed Decision, WMWD, as a member of the NEM-PAC, participated in the proceeding to ensure that its and other public agencies' NEM projects remained economically viable under the NEM transition period.

The retroactive granting of party status to WMWD will not prejudice any party, and will not delay the schedule or broaden the scope of the issues in the proceeding as the Commission has already established a twenty-year transition period for existing NEM customers as set forth

¹ The NEM-PAC's Response to Information Submitted with Reply Comments and Opening Comments on the Proposed Decision are still pending before the Docketing Office.

in Decision 14-03-041. Moreover, denying WMWD's Motion will substantially prejudice WMWD. The Commission initially accepted the Reply Comments and Reply Comments on the Proposed Decision documents for filing² and only recently determined that filing Reply Comments did not qualify WMWD for party status under RPP, Rule 1.4. The Docket Office has indicated that if WMWD's Motion is denied, it will be retroactively stricken from previously filed documents and the service list. Moreover, the NEM-PAC's currently pending Response to Information Submitted with Reply Comments and Opening Comments on the Proposed Decision will be rejected. For the reasons stated above, WMWD respectfully requests that the Commission grant this Motion Requesting Party Status, making WMWD a party to the proceeding retroactive to December 23, 2013.

Respectfully submitted,

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