# 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 12-03-014 (Filed March 22, 2012)

# MOTION FOR PARTY STATUS OF CAITHNESS ENERGY, L.L.C.

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Date: June 19, 2014

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### I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the Commission's Rules of Practice and Procedure, Caithness Energy, L.L.C. ("Caithness") respectfully submits this motion for party status in the above-captioned proceeding. Caithness seeks party status in this matter to address the issues raised in the Petition for Expedited Modification of Decision 13-02-015, filed on June 3, 2014 ("Petition"), by Terra-Gen Power, LLC ("Terra-Gen").

# II. BACKGROUND

#### A. Procedural History

On March 27, 2012, the Commission initiated this rulemaking proceeding to continue its efforts to, among other things, integrate and refine a comprehensive set of procurement policies. On February 13, 2013, the Commission issued Decision 13-02-015, which authorized Southern California Edison Company ("SCE") to procure between 1400 and 1800 MV of capacity in the West Los Angeles subarea of the Los Angeles basin local reliability area (D.13-02-015, p. 2). Terra-Gen subsequently filed the Petition in order to postpone and modify SCE's on-going Requests for Offers ("RFOs") pursuant to Decision 13-02-015 (Petition, p. 13).

#### III. **BASIS FOR SEEKING PARTY STATUS**

Pursuant to Rule 1.4(b)(2) of the Commission's Rules of Practice and Procedure, parties may participate in a proceeding if they state their factual and legal contentions and their interests are reasonably pertinent to the issues presented. Caithness is an independent developer of power generation facilities in California and throughout the United States. Accordingly, Caithness has a legitimate and compelling interest in the issues raised by Terra-Gen in its Petition.

#### IV. **CORRESPONDENCE**

All communications and correspondence regarding this matter should be sent to the following individuals:

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# V. CONCLUSION

For the reasons stated herein, Caithness respectfully requests that the Assigned Administrative Law Judge grant its Motion for Party Status in the above-captioned proceeding.

Respectfully submitted June 19, 2014

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