

**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 OF GRAPHITE ENERGY STORAGE
PARTNERS, LLC TO BECOME A PARTY**

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Dated: June 20, 2014

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Pursuant to Rules 1.4 and 11.1 of the Commission’s Rules of Practice and Procedure, Graphite Energy Storage Partners, LLC (“Graphite Energy”) hereby submits this motion to become a party to this proceeding. Under Rule 1.4(a)(4), a person may become a party to a proceeding by filing a motion requesting party status. Specifically, Graphite Energy requests party status in this proceeding for the purpose of responding to the petition for expedited modification of Decision (“D.”) 13-02-015 filed by Terra-Gen Power, LLC (Terra-Gen”) on June 3, 2014.

Graphite Energy may also participate in later stages, if any, of this and related proceedings.

Graphite Energy’s affiliate, Graphite Energy Pty Limited, is an Australian based business with a primary focus in its graphite-based G2 thermal storage technology, related thermal integration systems and related project development. As a developer of energy storage technology in markets around the world, Graphite Energy is keenly interested in deploying its capital and technology in well-structured markets

and processes that encourage the development and procurement of high-quality generation resources under a process anchored on fairness and transparency.

Graphite Energy is interested in this proceeding and the issues raised in Terra-Gen's petition for expedited modification because it has been an active participant in competitive procurement solicitations in California and has a vested interest in the implementation of sound procurement policies. Graphite Energy has an abiding interest in preserving the transparency and fairness of the competitive solicitation process.

Graphite Energy is filing its "Response to Petition for Expedited Modification of Decision 13-02-015" contemporaneously with this motion. In its response, Graphite Energy is presenting its concerns about the processes used in the competitive solicitation resulting from D.13-02-015. The goal of our response and the petition is to restore and maintain a solicitation process that is fair, transparent, and consistent with the purposes of this proceeding and the general intent of D.13-02-015. The issues raised in the petition are directly relevant to the issues already raised in this proceeding and addressed in D.13-02-015.

Graphite Energy will participate in this proceeding through its representative, whose information is as follows:

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Graphite Energy respectfully asks the Commission to grant this motion and to allow Graphite Energy to participate as a party in this proceeding.

Respectfully submitted June 20, 2014.

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By /s/ Nicholas Bain
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