

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

Order Instituting Rulemaking to Enhance the Role of
Demand Response in Meeting the State's Resource
Planning Needs and Operational Requirements.

R.13-09-011
(Filed September 19, 2013)

**MOTION OF THE INDEPENDENT ENERGY PRODUCERS
ASSOCIATION TO BECOME A PARTY**

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Attorneys for the Independent Energy Producers
Association

Dated: August 21, 2014

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Pursuant to Rules 1.4 and 11.1 of the Commission's Rules of Practice and Procedure, the Independent Energy Producers Association (IEP) submits this motion to become a party to this proceeding.

IEP is a nonprofit public benefit corporation formed under the laws of the State of California to encourage the development and use of independent electric resources. Its members own and operate roughly 20,000 megawatts of electric generation capacity in California. IEP has been representing the interests of the developers and operators of renewable and other independent electricity resources before the Commission, other agencies, the Legislature, and the courts since 1982.

The Assigned Commissioner and Administrative Law Judge Joint Ruling and Scoping Memo of November 14, 2013, establishes four phases to this proceeding, each one addressing different issues related to the role of demand response in meeting the State's resource planning needs and operational requirements. The current phase, Phase Three, covers future demand response program design and competitive procurement mechanisms. Several parties

have entered into a Settlement Agreement that would resolve this phase of the proceeding.¹ The initiatives considered in the Settlement Agreement could impact competition in the wholesale electricity markets operated by the California Independent System Operator (CAISO). IEP represents independent generators who compete in the CAISO's markets. The integration of demand response programs as Supply Resources that could be directly bid into the CAISO's wholesale electricity markets raises the concern that all Supply Resources should compete on a fair and equal basis and be subject to the same requirements. As a representative of generators who compete in the CAISO's markets, IEP has an interest in the outcome of this proceeding.

If IEP's motion is granted, IEP intends to actively participate in this proceeding and, particularly, in the consideration of the proposed Settlement Agreement. IEP's participation will not prejudice any party nor will it expand the scope of this proceeding. IEP's participation concerns issues that are currently under consideration by the Commission in this docket. Moreover, IEP's participation will not cause any delay in the proceeding.

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

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¹ Motion for Adoption of Settlement Agreement Between and Among Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, California Independent System Operator Corporation, Office of Ratepayer Advocates, The Utility Reform Network, California Large Energy Consumers Association, Consumer Federation of California, Alliance for Retail Energy Markets, Direct Access Customer Coalition, Marin Clean Energy, Enernoc, Inc., Comverge, Inc., Johnson Controls, Inc., Olivine, Inc., Energyhub/Alarm.Com, Sierra Club, Environmental Defense Fund, And Clean Coalition On Phase 3 Issues (Aug. 4, 2014).

IEP respectfully asks the Commission to maintain Mr. Steven Kelly, IEP's Policy Director, on the service list for this proceeding in the "Information Only" category.²

IEP respectfully requests the Commission grant its motion and allow IEP to participate as a party in this proceeding.

Respectfully submitted August 21, 2014 at San Francisco, California.

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By /s/ Brian T. Cragg

Brian T. Cragg

Attorneys for the Independent Energy Producers
Association

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² Mr. Cragg is currently on the service list for this proceeding in the Information Only category. If this motion is granted, he can be removed from that portion of the service list.