

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

Order Instituting Rulemaking on the
Commission's Own Motion to Conduct a
Comprehensive Examination of Investor Owned
Electric Utilities' Residential Rate Structures, the
Transition to Time Varying and Dynamic Rates,
and Other Statutory Obligations.

R.12-06-013
(Filed June 21, 2012)

**MOTION FOR PARTY STATUS OF THE
CALIFORNIA ENERGY STORAGE ALLIANCE**

Donald C. Liddell
DOUGLASS & LIDDELL
2928 2nd Avenue
San Diego, California 92103
Telephone: (619) 993-9096
Facsimile: (619) 296-4662
Email: liddell@energyattorney.com

Attorneys for the
CALIFORNIA ENERGY STORAGE ALLIANCE

August 1, 2014

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

Order Instituting Rulemaking on the Commission’s Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities’ Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations.

R. 12-06-013
(Filed June 21, 2012)

**MOTION FOR PARTY STATUS OF THE
CALIFORNIA ENERGY STORAGE ALLIANCE**

In accordance with the provisions of Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ respectfully moves for party status in this proceeding.

I. DESCRIPTION OF CESA.

CESA is a membership-based advocacy group committed to advancing the role of energy storage in the electric power sector through policy, education, outreach, and research. CESA’s

¹ The California Energy Storage Alliance consists of 1 Energy Systems, A123 Systems, AES Energy Storage, Alton Energy, American Vanadium, Aquion Energy, ARES, North America, Beacon Power, Bosch Energy Storage Solutions, Bright Energy Storage Technologies, Brookfield Renewable Energy Group, CALMAC, ChargePoint, Clean Energy Systems, CODA Energy, Consolidated Edison Development, Customized Energy Solutions, DN Tanks, Duke Energy, Eagle Crest Energy Company, EaglePicher Technologies, East Penn Manufacturing Company, EDF Renewable Energy, EnerSys, EnerVault, EV Grid, FAFCO Thermal Storage Systems, FIAMM Group, FIAMM Energy Storage Solutions, Flextronics, Foresight Renewable Solutions, GE Energy Storage, Green Charge Networks, Greensmith, Gridscape Solutions, Gridtential, Halotechnics, Hitachi Chemical Co., Hydrogenics, Ice Energy, Imergy Power Systems, ImMODO Energy Services Corporation, Innovation Core SEI, Invenergy, K&L Gates, KYOCERA Solar, LG Chem, LightSail Energy, LS Power, Mitsubishi International Corporation, NextEra Energy Resources, NRG, OCI, OutBack Power Technologies, Panasonic, Parker Hannifin, PDE, Powertree, Primus Power, RES Americas, Rosendin Electric, S&C Electric Company, Saft, SeaWave Battery, SEEO, Sharp Labs of America, SolarCity, Sovereign Energy Storage, STEM, Stoel Rives, SunPower, TAS Energy, Tri-Technic, UniEnergy Technologies, and Wellhead. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. <http://storagealliance.org>

membership includes technology manufacturers, project developers, systems integrators, consulting and legal firms, and other clean tech industry leaders. CESA strongly supports California's policies focused on enabling conservation and efficiency on the customer side of the utility meter, and decreasing reliance on fossil-based generation to reduce overall greenhouse gas emissions.

II. CESA'S INTEREST IN THIS PROCEEDING.

CESA supports the Commission's intent in opening this rulemaking proceeding to examine whether current residential rate structures continue to support underlying statewide-energy goals, result in equitable treatment across customers and customer classes, and "*facilitate development of technologies that enable customers to better manage their usage and bills*" (OIR, p. 2). CESA is familiar with the record developed in this proceeding to date, and participated in the technical workshops that were held at the Commission on July 30 and July 31. CESA moves for a ruling granting party status at this time in order to prepare and serve opening testimony, currently due on September 15, 2014.

CESA's testimony will relate directly to the substantial impact that policy outcomes determined in this proceeding will have on its membership in accelerating use of energy storage technology in furtherance of well recognized synergies between rate design development and energy storage technology deployment California.

CESA's testimony, and its active participation in cross examination of witnesses, propounding data requests, briefing, and comments as appropriate, will inform the Commission's record in this proceeding by assuring full appreciation of the important role that energy storage will play in helping to facilitate successful implementation of forward thinking rate design policies.

III. NOTICES.

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to CESA's counsel at the address set forth below:

Donald C. Liddell
DOUGLASS & LIDDELL
2928 2nd Avenue
San Diego, California 92103
Telephone: (619) 993-9096
Facsimile: (619) 296-4662
Email: liddell@energyattorney.com

IV. CONCLUSION.

CESA's participation in this proceeding will not prejudice any party, and will not delay the schedule, duplicate participation by any other party, or broaden the scope of the issues in the proceeding. For the reasons stated above, CESA respectfully moves for a ruling granting this motion for party status.

Respectfully submitted,



Donald C. Liddell
DOUGLASS & LIDDELL

Attorneys for the
CALIFORNIA ENERGY STORAGE ALLIANCE

August 1, 2014