

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

Order Instituting Rulemaking Regarding Policies,
Procedures, and Rules for Development of
Distribution Resources Plans Pursuant to Public
Utilities Code Section 769

Rulemaking 14-08-013
Filed August 14, 2014

MOTION OF ENVIRONMENTAL DEFENSE FUND FOR PARTY STATUS

Lauren Navarro
Attorney and Senior Manager
Environmental Defense Fund
1107 9th Street, Suite 1070
Sacramento, CA 95814
Phone: (916) 492-7074
Email: lnavarro@edf.org

Jennifer L Weberski
Consultant on behalf of
Environmental Defense Fund
49 Terra Bella Drive
Walnut Creek, CA 94596
Phone: (703) 489-2924
Email: jleesq@yahoo.com

Dated: September 3, 2014

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

Order Instituting Rulemaking Regarding Policies,
Procedures, and Rules for Development of
Distribution Resources Plans Pursuant to Public
Utilities Code Section 769

Rulemaking 14-08-013
Filed August 14, 2014

MOTION OF ENVIRONMENTAL DEFENSE FUND FOR PARTY STATUS

I. INTRODUCTION

Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Environmental Defense Fund, Inc. (EDF) respectfully moves for party status in this proceeding.

II. DISCUSSION

EDF is a leading non-profit organization representing nearly 320,000 members across the country, including approximately 55,000 in California. Since 1967, EDF has linked science, economics, law, and innovative private-sector partnerships to create breakthrough solutions to the most serious environmental problems. EDF has been active in California on environmental issues since the 1970s, and has participated in proceedings on energy-related topics at the Commission since 1976. EDF has interest and expertise in the role that market-based approaches can play in achieving positive environmental outcomes, an approach that is particularly salient in the field of energy regulation.

EDF is involved in pilots, legislation and dockets addressing a myriad of clean energy in California and other states. The organization has expertise in and has or is currently participating in other proceedings at this Commission related to treatment of

demand response, smart grids, time-variant rates, alternative-fueled vehicles and energy storage. In addition, EDF co-sponsored California's landmark bipartisan 2006 climate bill, the Global Warming Solutions Act (AB 32). This bill has resulted in a suite of climate change regulations, including an innovative cap-and-trade system, and carries with it the potential to inspire important strides in clean energy resources.

EDF has long been a supporter of the benefits of third party distributed energy resources (DERs) to the grid and believes that their inclusion into utility resource plans, pursuant to AB 327, has the potential to be of tremendous value. EDF has participated as one of a group of key stakeholders, including representatives from the Commission, California Independent Systems Operator, the Governor's office, and investor-owned utilities (IOUs) in the "More than a Smart Grid" effort led by Commissioner Michael Picker. This select group collaborated with the Resnick Institute to develop the paper that helps to frame this proceeding, examining how the distribution grid can prepare for the significant amounts of clean DER California is expecting, how to appropriately value these resources, and the future role of utilities.¹

EDF seeks party status on its own behalf, as a non-profit environmental advocacy organization with a long history of work on shaping and implementing climate change and clean energy policy. EDF strongly asserts that it is important for California to keep working to integrate a diverse set of clean energy solutions, including third party DERs. By requiring IOUs to take DERs into account in the planning and operations of their

¹ See Order Instituting Rulemaking Regarding Policies, Procedures, and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769, R. 14-08-013, Appendix B (filed August 14, 2014) (OIR).

electric distribution systems, the Commission is taking an important step that will have potentially significant benefits for overall grid reliability and for ratepayers. This, in addition to ensuring that DERs are cost-effective, will go a long way towards ensuring an energy future with more renewable resources – and holds the possibility of a healthier environment for IOU customers across the state. Accordingly, EDF’s 55,000 members in the state will be well served by our participation.

III. SERVICE

Services of notices, orders, and other communications and correspondence in this proceeding should be directed to EDF at the addresses set forth below.

Lauren Navarro
Attorney and Senior Manager
Environmental Defense Fund
1107 9th Street, Suite 1070
Sacramento, CA 95814
Phone: (916) 492-7074
Email: lnavarro@edf.org

In addition, the following person should be added to the “Information Only” list:

Jennifer L Weberski
Consultant on behalf of
Environmental Defense Fund
49 Terra Bella Drive
Walnut Creek, CA 94596
Phone: (703) 489-2924
Email: jleesq@yahoo.com

IV. CONCLUSION

For the reasons stated above, Environmental Defense Fund respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on September 3, 2014.

ENVIRONMENTAL DEFENSE FUND

/s/ Lauren Navarro

Lauren Navarro
Attorney and Senior Manager
Environmental Defense Fund
1107 9th Street, Suite 1070
Sacramento, CA 95814
Phone: (916) 492-7074
Email: lnavarro@edf.org

/s/ Jennifer L. Weberski

Jennifer L. Weberski
Consultant on behalf of
Environmental Defense Fund
49 Terra Bella Drive
Walnut Creek, CA 94596
Phone: (703) 489-2924
Email: jleesq@yahoo.com