BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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07-26-11
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Order Instituting Rulemaking to Consider the Annual Revenue Requirement Determination of the California Department of Water Resources and related issues.	))))))	Rulemaking 11-03-006 (Filed March 10, 2011)

MOTION OF THE KINGS RIVER CONSERVATION DISTRICT FOR PARTY STATUS

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July 26, 2011

Attorneys for the
Kings River Conservation District

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Pursuant to Rules 11.1 and 1.4 of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California ("Commission"), the Kings River Conservation District ("KRCD") hereby requests that it be allowed to intervene and become a party in the above-captioned proceeding.

KRCD is a resource management agency serving a variety of water and energy-related functions in the Kings River region in Fresno, Kings and Tulare counties. Among other things, KRCD provides flood protection and groundwater management, acts as the operating agent for the San Joaquin Valley Power Authority (a community choice aggregator), and owns and operates two electric generating facilities: the Pine Flat Hydroelectric Power Plant and the Malaga Peaking Power Plant ("Malaga"). Most relevant to this proceeding, output from Malaga is sold by KRCD to the California Department of Water Resources ("CDWR"), and allocated to Pacific Gas and Electric Company ("PG&E").[1]

As established in the Order Instituting Rulemaking ("OIR"), "[t]he purpose of this rulemaking is to consider the annual revenue requirement filing of [CDWR] and issues related to

[1] *See, e.g.,* D.05-12-021; Ordering Paragraph 1.

the administration of CDWR's power contracts."[2] The expiration date for KRCD's contract with CDWR is September 18, 2015, making KRCD's contract the last of CDWR's power contracts to expire. After December 31, 2013 (for nearly twenty-one months), KRCD's contract with CDWR will be the only remaining CDWR power contract, potentially affecting issues related to contract administration.

KRCD desires to participate in this proceeding for the purpose of identifying and examining unique issues related to the administration of CDWR's contract with KRCD. KRCD's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding.

Accordingly, KRCD requests that the assigned Administrative Law Judge issue a ruling authorizing KRCD to intervene in this proceeding and designating KRCD as an interested party (using the name and address set forth below for correspondence and communication).

Dated: July 26, 2011

Respectfully submitted,

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[2] OIR at 2.