



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

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In the Matter of the Application of Pacific Gas and Electric Company for Adoption of its Customer Data Access Project (U 39-E).

Application 12-03-002  
(Filed March 5, 2012)

In the Matter of the Application of San Diego Gas & Electric Company (U902E) for Authority To Implement a Backhaul Program To Provide Authorized Third Party Access to a Customer's Usage Data Based Upon Consent of the Customer.

Application 12-03-003  
(Filed March 5, 2012)

Application of Southern California Edison Company (U338E) for Approval of Proposal To Enable Automated Access of Customer Usage Data to Authorized Third Parties and Approval of Cost Recovery Mechanism.

Application 12-03-004  
(Filed March 5, 2012)

**MOTION OF OPEN ENERGY NETWORK FOR PARTY STATUS**

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June 15, 2012

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

In the Matter of the Application of Pacific Gas and Electric Company for Adoption of its Customer Data Access Project (U 39-E).	Application 12-03-002 (Filed March 5, 2012)
In the Matter of the Application of San Diego Gas & Electric Company (U902E) for Authority To Implement a Backhaul Program To Provide Authorized Third Party Access to a Customer's Usage Data Based Upon Consent of the Customer.	Application 12-03-003 (Filed March 5, 2012)
Application of Southern California Edison Company (U338E) for Approval of Proposal To Enable Automated Access of Customer Usage Data to Authorized Third Parties and Approval of Cost Recovery Mechanism.	Application 12-03-004 (Filed March 5, 2012)

**MOTION OF OPEN ENERGY NETWORK FOR PARTY STATUS**

The Open Energy Network (“OPEN”)<sup>1</sup> respectfully moves for party status in the above-captioned consolidated proceeding (A.12-03-002, A.12-03-003, and A.12-03-004) of the Public Utilities Commission of the State of California (the “Commission”). This Motion is filed and served pursuant to Rule 1.4(a)(4) of the Commission’s Rules of Practice and Procedure.

**I. DESCRIPTION OF OPEN ENERGY NETWORK (Rule 1.4(b)(1))**

OPEN is a network of entrepreneurial businesses, regulatory stakeholders, and energy policy advocates dedicated to establishing a clean energy future that promotes and encourages innovation for the benefit of consumers. OPEN believes that policies that enable engaged

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<sup>1</sup> A list of OPEN’s members is attached to this Motion. OPEN is an advocacy organization representing many individual companies and organizations. OPEN’s positions represent the views of its collective membership, but may not represent the views of any individual member.

consumers with open access to information, technologies, and services will best drive investment in innovation and efficiency in the U.S. residential and commercial energy markets. To that end, OPEN advocates at the state and federal levels for regulatory and legislative policies that maximize customer access to advanced meter data, innovative technologies, market price signals and market services payments, and energy services on the consumer or customer side of the electric meter.

## **II. OPEN’S INTEREST IN THIS PROCEEDING (Rule 1.4(b)(2))**

OPEN’s members offer a wide variety of advanced energy technologies and services to customers in residential and commercial energy markets, including in California. The applications filed in this proceeding raise important issues surrounding customer access to energy data, including the proper timeframe for implementing GreenButton and other policy reforms that empower market participants, like OPEN’s members, with a continuous flow of information. Energy data, including consumption and pricing information, is an essential ingredient for an innovative and robust market in which customers are engaged participants. Our members believe that a consumer or trusted third-party service provider should be able to access his or her energy data easily, conveniently, and in real time.

OPEN has a direct interest in, and could be impacted by, the Commission’s review and decision on the applications at issue in this proceeding. OPEN therefore seeks party status to fully participate in this proceeding as outlined in the Scoping Memo.<sup>2</sup> OPEN’s participation will include, but is not limited to, participating in party and utility discussions to clarify or resolve open issues and filing opening and reply comments.

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<sup>2</sup> *In the Matter of the Application of Pacific Gas & Elec. Co. for Adoption of its Customer Data Access Project (U39E) et al.*, A.12-03-002 et al., Assigned Commissioner’s Ruling and Scoping Memo (May 25, 2012) (“Scoping Memo”).

### III. CONCLUSION

For the foregoing reasons, OPEN has a direct and substantial interest in the issues that will be considered in this proceeding. OPEN therefore moves the Commission to grant OPEN party status in A.12-03-002, A.12-03-003, and A.12-03-004 and permit OPEN to participate in discussions and to submit comments consistent with the schedule adopted in the Scoping Memo.

Respectfully submitted,

/s/ G. Scott Binnings

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*Attorneys for the Open Energy Network*

Dated: June 15, 2012

## **OPEN MEMBERS**

3scale Networks	<a href="http://www.3scale.net/">http://www.3scale.net/</a>
Bidgely	<a href="http://bidgely.com/">http://bidgely.com/</a>
Bright Power	<a href="http://www.brightpower.com/">http://www.brightpower.com/</a>
C3	<a href="http://www.c3energy.com/">http://www.c3energy.com/</a>
Clasma Events, Inc	<a href="http://www.clasma.com/">http://www.clasma.com/</a>
ecodog	<a href="http://www.ecodoginc.com/">http://www.ecodoginc.com/</a>
Econofy	<a href="http://beta.econofy.com/">http://beta.econofy.com/</a>
Energy Future Coalition	<a href="http://www.energyfuturecoalition.org/">http://www.energyfuturecoalition.org/</a>
EnergyAi	<a href="http://www.energyai.com/EAIWeb/">http://www.energyai.com/EAIWeb/</a>
EnergyHub	<a href="http://www.energyhub.com/">http://www.energyhub.com/</a>
EnerNOC	<a href="http://www.enernoc.com/">http://www.enernoc.com/</a>
EnergySavvy	<a href="http://www.energysavvy.com/">http://www.energysavvy.com/</a>
Environmental Defense Fund	<a href="http://www.edf.org/">http://www.edf.org/</a>
Galvin Electricity Initiative/ Perfect Power Institute	<a href="http://perfectpowerinstitute.org/">http://perfectpowerinstitute.org/</a>
Genability	<a href="http://genability.com/">http://genability.com/</a>
Greenlet Technologies	<a href="http://www.greenlet.net/">http://www.greenlet.net/</a>
Illinois Citizens Utility Board	<a href="http://www.citizensutilityboard.org/">http://www.citizensutilityboard.org/</a>
Lowfoot	<a href="http://lowfoot.com/">http://lowfoot.com/</a>
Lucid	<a href="http://www.luciddesigngroup.com/">http://www.luciddesigngroup.com/</a>
M2M Datasmart	<a href="http://www.m2mdatasmart.com">http://www.m2mdatasmart.com</a>
People Power	<a href="http://peoplepowerco.com/">http://peoplepowerco.com/</a>
PlotWatt	<a href="https://plotwatt.com/">https://plotwatt.com/</a>
Renewable Funding	<a href="https://www.renewfund.com/">https://www.renewfund.com/</a>
Retroficiency	<a href="http://www.retroficiency.com/">http://www.retroficiency.com/</a>
Snugg Home	<a href="http://www.snugghome.com/">http://www.snugghome.com/</a>
SolarList	<a href="http://solarlist.com/welcome/">http://solarlist.com/welcome/</a>
SunReports, Inc.	<a href="http://www.sunreports.com/">http://www.sunreports.com/</a>
Tendril	<a href="http://www.tendrilinc.com/">http://www.tendrilinc.com/</a>
Verizon	<a href="http://www22.verizon.com/">http://www22.verizon.com/</a>
Watts@Work	<a href="http://www.wattsatwork.com">http://www.wattsatwork.com</a>