

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



FILED

10-30-13
08:11 AM

Application of San Diego Gas and Electric Company (U902E) For Authority To Implement Optional Pilot Program To Increase Customer Access to Solar Generated Electricity

Application No. 12-01-008
(Filed January 17, 2012)

In the Matter of the Application of Pacific Gas and Electric Company to Establish a Green Option Tariff

Application No. 12-04-020

**MOTION OF THE SUSTAINABLE ECONOMIES LAW CENTER
REQUESTING PARTY STATUS**

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**MOTION OF THE SUSTAINABLE ECONOMIES LAW CENTER
REQUESTING PARTY STATUS**

I. Introduction

Pursuant to Rule 1.4 of the California Public Utilities Commission's Rules of Practice and Procedure, the Sustainable Economies Law Center (SELC) respectfully moves for party status in the above-captioned consolidated proceedings. The October 25, 2013 Assigned Commissioner and Administrative Law Judge's Scoping Ruling ("Scoping Memo") sets forth the procedural schedule and addresses the scope of this consolidated proceeding following the prehearing conference (PHC) held on September 25, 2013.

SELC moves for party status at this stage of this consolidated proceeding for the following reasons. First, as explained below, SELC's involvement in this consolidated proceeding primarily relates to the recent enactment of Senate Bill (SB) 43 (Green Tariff Shared Renewables Program),¹ which the Governor signed on September 28, 2013. Second, SELC only became aware of the September 25, 2013 PHC after SB 43 became law, and therefore, was unable to participate in the PHC. Third, SELC did not know the range of issues related to SB 43 that would be included in this proceeding prior to the release of the Scoping Memo on October 25, 2013. As such, SELC respectfully requests that the Administrative Law Judge consider this motion and grant SELC party status.

¹ Statutes of 2013, Chapter 413.

II. SELC's Interest In This Proceeding

A. SELC's Experience in Community Renewable Energy Demonstrates its Qualifications to Participate in this Consolidated Proceeding

SELC, a fiscally supported project of Community Ventures, is a non-profit, Internal Revenue Code Section 501(c)(3) organization based in Oakland, California. Since 2009, SELC has specialized in charting the changing legal territory of the new economy and in educating communities and individuals about the possibilities and limits of creative economic structures – including shared housing, car sharing, and shared renewable energy. In 2013, SELC launched a community renewable energy program to educate the public about community-owned renewable energy projects and to encourage the participation of diverse communities in local, community-shared renewable energy generation.

SELC seeks to promote accessibility of renewable energy for individuals who are unable to access the benefits of onsite generation and to enhance community well being through ownership opportunities. To that effect, SELC is working with organizations and communities in the East Bay to address barriers to small-scale local generation and shared renewable energy systems. SELC believes that its legal expertise in community-based economies and its experience advocating for expanded opportunities for diverse communities to engage in their energy future will be of assistance to the Commission in this consolidated proceeding.

B. SELC Seeks to Provide Comments on the Utilities' Proposed Enhanced Community Renewables Programs and Other Related Proposals to Comply with Senate Bill 43

SELC's interest in this consolidated proceeding stems from the recent enactment of SB 43 and the October 25, 2013 Scoping Memo which requires investor-owned utilities to demonstrate their proposed compliance with the Legislative Findings and Statements of Intent contained in SB 43. In particular, SELC seeks the opportunity to provide comments on the design of the "enhanced community renewables programs" within the Green Tariff Shared Renewables (GTSR) program.

As this consolidated proceeding now requires consideration of the SB 43 mandates, SELC contends that investor-owned utilities should propose programs that permit arrangements between community-scale renewable generation developers and green tariff customers. These programs would enable access to shared systems for diverse communities and incentivize market innovation. Specifically, investor-owned utilities should propose "enhanced community renewables programs" that provide opportunities for community-based or collective ownership models of shared renewable electricity generation. SELC believes these opportunities would help spur local innovation, development, and economies, create green jobs, and minimize environmental impacts through distributed energy generation.

With this community-based perspective, SELC seeks to analyze how the investor-owned utilities' proposed GTSR programs meet the following SB 43 directives:

- Provide support for enhanced community renewables programs to facilitate development of eligible renewable energy resource projects located close to the source of demand;
- To the extent possible, seek to procure eligible renewable energy resources that are located in reasonable proximity to enrolled participants;
- Actively market the utility's green tariff shared renewables program to low-income and minority communities and customers;
- Reserve 100 MW of projects, no larger than 1 MW in size, in areas identified as the most impacted and disadvantaged communities.²

The above-identified issues are requirements under SB 43 and must be addressed according to the Scoping Memo. As such, these issues are within the scope of this consolidated proceeding. SELC's participation therefore does not broaden the scope of this proceeding or prejudice the rights of any other party. The quantity of comments SELC will present is not yet known, and SELC reserves the right to comment on other issues identified in the October 25, 2013 Scoping Memo.

² See Public Utilities Code Section 2833.

III. Notice

Service of notices, orders and other correspondence in this consolidated proceeding should be directed to SELC at the address set forth below:

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IV. Conclusion

SELC's participation in this consolidated proceeding will not prejudice any party, and will not delay the schedule or broaden the scope of the issues identified in the October 25, 2013 Scoping Memo. For the reasons stated above, SELC respectfully requests that the Commission grant this Motion Requesting Party Status.

Respectfully submitted,

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Dated: October 30, 2013