



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

**FILED**

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Application of San Diego Gas & Electric Company  
(U902E) for Adoption of its Smart Grid Deployment  
Plan

And Related Matters.

Application 11-06-006  
(Filed June 6, 2011)

Application 11-06-029  
Application 11-07-001

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

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**CALIFORNIA ENERGY STORAGE ALLIANCE**

March 20, 2012

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

Application of San Diego Gas & Electric Company (U902E) for Adoption of its Smart Grid Deployment Plan	Application 11-06-006 (Filed June 6, 2011)
And Related Matters.	Application 11-06-029 Application 11-07-001

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

The California Energy Storage Alliance (“CESA”)<sup>1</sup> respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission’s Rules of Practice and Procedure in order to submit comments on the Smart Grid Workshop Report, which was issued on March 1, 2012, and released on March 2, 2012 as an Attachment to a Ruling by Administrative Law Judge (“ALJ”) Timothy J. Sullivan, *Administrative Law Judge’s Ruling Adding Workshop Report to Record* (“Workshop Report”). CESA’s comments are submitted in accordance with ALJ Sullivan’s separate ruling, *Administrative Law Judge Ruling Setting Schedule and Topics for Workshops*, issued November 22, 2011.

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<sup>1</sup> The California Energy Storage Alliance consists of 4R Energy, A123 Systems, Bright Energy Storage Technologies, CALMAC, Chevron Energy Solutions, Debenham Energy, Deeya Energy, East Penn Manufacturing Co., Inc., EnerVault, Fluidic Energy, Greensmith Energy Management Systems, HDR Engineering, Inc., Ice Energy, LG Chem, LightSail Energy, Inc., Powergetics, Primus Power, Prudent Energy, RedFlow Technologies Ltd., RES Americas, Saft America, Inc., Samsung SDI, SANYO Energy Corporation, Seeo, Sharp Labs of America, Silent Power, Sumitomo Electric, SunEdison, SunVerge, TAS Energy, and Xtreme Power. 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://www.storagealliance.org>.

**I. DESCRIPTION OF CESA.**

CESA is an *ad-hoc* advocacy group made up of renewable energy system integrators, consultants and energy storage system manufacturers. CESA’s mission is to expand the role of energy storage to promote faster adoption of renewable energy and a more stable and secure electricity grid in California.

**II. CESA’S INTEREST IN THIS PROCEEDING**

By this Motion for Party Status, CESA seeks party status in order to file Comments of the California Energy Storage Alliance on Smart Grid Workshop Report responding to the ALJ’s Ruling (“CESA’s Comments”) that are currently lodged with the Commission’s Docket Office, pending a ruling granting this Motion for Party Status.

CESA’s Comments relate directly to advocating for a substantial role for energy storage in the Smart Grid as a matter of good public policy and the potential significant impact that the issues discussed in the Workshop Report may have on the ability of CESA’s member companies to successfully participate in Smart Grid-related business opportunities in California. In addition to opening comments, CESA contemplates possibly filing reply comments and otherwise participating appropriately as an active party in this proceeding. CESA’s interests are not represented by any party to this proceeding, and its comments are directly relevant to the issues raised by the ALJ’s Ruling.

**III. NOTICE**

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:

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**IV. CONCLUSION.**

CESA'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. For the reasons stated above, CESA respectfully requests that the Commission grant this Motion for Party Status and direct the Docket Office to accept the Comments of CESA for filing.

Respectfully submitted,



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DOUGLASS & LIDDELL

Counsel for the  
**CALIFORNIA ENERGY STORAGE ALLIANCE**

Date: March 20, 2012