



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

In The Matter of the Application of SAN DIEGO )	
GAS & ELECTRIC COMPANY (U902E) for a )	Application No. 09-08-003
Permit to Construct Electrical Facilities With )	(Filed August 10, 2009)
Voltages Between 50 kV and 200 kV and New )	
Substations With High Side Voltages Exceeding )	
50kV: The East County Substation Project. )	
_____ )	

**IBERDROLA RENEWABLES, LLC’S  
MOTION FOR PARTY STATUS**

Pursuant to Rules 1.4 and 11.1(b) of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, Iberdrola Renewables, LLC (Iberdrola Renewables) hereby moves for party status in the Commission’s proceeding for Application No. 09-08-003.

**I. DESCRIPTION OF IBERDROLA RENEWABLES**

Tule Wind, LLC, which is proposing the Tule Wind Project, is a subsidiary of Iberdrola Renewables. Iberdrola Renewables is the second-largest wind operator in the United States, with more than 4,800 MW in operation. Currently, Iberdrola Renewables produces enough clean, homegrown energy to meet the needs of more than one million typical American homes.

As national leader in clean energy, Iberdrola Renewables is deeply rooted in the United States. Iberdrola Renewables employed more than 850 people at the end of 2010 in the United States. Iberdrola Renewables also operates 636 MW of gas-fired generation and 118 BCF of owned and contracted gas storage, making it one of the few companies capable of providing structured energy solutions and allowing large industrial and commercial customers to manage risks and uncertainty in the natural gas and power industries.

## **II. IBERDROLA RENEWABLES' INTEREST IN THIS PROCEEDING**

The Tule Wind Project (Tule Wind) is one of the projects evaluated by the Final Joint Environmental Impact Report/Environmental Impact Statement for the East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects (Final EIR/EIS). The analysis of the environmental impacts of Tule Wind in the Final EIR/EIS, which is required by federal and state law, will inform the public as to those impacts and will substantively affect whether and how responsible agencies under the California Environmental Quality Act approve and condition Tule Wind. Accordingly, these proceedings directly implicate Iberdrola Renewables' interest in Tule Wind, and on that basis, Iberdrola Renewables seeks to participate.

## **III. IBERDROLA RENEWABLES' PARTICIPATION IN THE PROCEEDING**

Iberdrola Renewables intends to submit comments on the the Proposed Interim Decision Certifying Environmental Impact Report/Environmental Impact Statement, issued March 19, 2012 (Proposed Interim Decision). These comments will suggest modifications to the Proposed Interim Decision to ensure it is fully consistent with the Final EIR/EIS. Iberdrola Renewables also seeks party status to ensure the opportunity to fully participate in the proceeding in the future, including opportunity to participate in any future meetings or hearings, briefing, or filing or responding to procedural motions.

## **IV. IBERDROLA RENEWABLES' REPRESENTATIVES**

Iberdrola Renewables requests that the individuals below be added to the service list for this proceeding.

Party Representative  
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**V. CONCLUSION**

Iberdrola Renewables requests that the Commission grant Iberdrola Renewables' motion for party status in A.09-08-003 and allow Iberdrola Renewables to fully participate in this proceeding in the future, as detailed above.

Dated: April 4, 2012

Respectfully submitted,

DANIEL P. BRUNTON

/s/ Daniel P. Brunton

By: Daniel P. Brunton

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