

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



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In the Matter of the Application of Southern California Edison Company (U338E) for a Certificate of Public Convenience and Necessity Concerning the Tehachapi Renewable Transmission Project (Segments 4 through 11).

Application 07-06-031
(Filed June 29, 2007)

MOTION OF FIRST SOLAR FOR PARTY STATUS

Rachel McMahon
Director of Regulatory Affairs
First Solar
525 Market Street, 15th Floor
San Francisco, CA 94105
Telephone: 415-935-2550
Facsimile: 415-935-2501
E-mail: rachel.mcmahon@firstsolar.com

August 9, 2012

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Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission's (hereafter "Commission") Rules of Practice and Procedure and an email sent by Administrative Law Judge Vieth on August 7, 2012, First Solar submits this motion requesting party status in Application (A.) 07-06-031.

I. DESCRIPTION OF FIRST SOLAR

First Solar is headquartered in the United States, and is a world leader in the manufacture of photovoltaic (PV) solar modules, and a premier provider of comprehensive PV solar systems. By enabling clean, renewable electricity at competitive prices, First Solar provides an economically and environmentally viable alternative to peaking fossil-fuel electricity generation, and is focused on creating value-driven renewable energy solutions that protect and enhance the environment. First Solar's business also spans the entire value chain, as we manufacture the PV panels, develop centralized project sites, provide engineering, construction and procurement services to all projects, as well as operations and maintenance services.

II. STATEMENT OF INTEREST IN A.07-06-031

First Solar has a strong interest in transmission, interconnection, renewable portfolio standard, and resource adequacy public policy issues in California and the U.S. Southwest. First Solar has the largest portfolio of utility-scale solar PV projects in California and bordering states. Specifically, First Solar has more than 2,500 megawatts of solar PV projects within California that are in various stages of development and construction. In addition to specific commercial

matters, First Solar is active in proceedings before the California Independent System Operator and the Commission regarding transmission planning and interconnection reform, integration of solar resources on to the grid, and implementation of the Renewables Portfolio Standard. Specific to this proceeding, First Solar has several projects in various stages of development and construction, some of which have power purchase agreements with California investor-owned utilities, which will rely upon the Tehachapi Renewable Transmission Project (TRTP) to ensure delivery. The re-opening of A.07-06-031 is having direct contractual and development implications to these projects now. We are particularly concerned with the potential for delay of Segment 8A of the TRTP. Thus, any decision made by the Commission within this proceeding is of great interest to First Solar. Our interest, which is specific to our projects, is not already represented by any other party.

III. PARTICIPATION IN THE PROCEEDING

On July 2, 2012, President Peevey issued a *Scoping Memo and Ruling of Assigned Commissioner* in this proceeding (the “ACR”). The ACR states one of President Peevey’s objectives as achieving a “timely and lawful resolution that . . . enables the delivery of electric generation over the TRTP on the schedule currently anticipated.”¹ (ACR at p. 3).

As noted above, First Solar is in various stages of development and construction of projects that rely upon TRTP to ensure delivery. Thus, First Solar intends to address issues relating to the timing of TRTP completion in accordance with the scope and procedural schedule described in the ACR. First Solar seeks party status to ensure that the company has the opportunity to participate in the proceeding and advocate for its direct commercial interests in this case as an active party, including reviewing and, if necessary, sponsoring testimony, participating in any future meetings or hearings, preparing briefs and comments, and filing or responding to procedural motions.

Given that First Solar’s participation will be limited to the scope set forth in the ACR and that initial testimony is not due in this proceeding for more than six months,² granting First Solar’s request will not expand the scope of the proceeding, delay the existing schedule, or

¹ ACR at p. 3.

² SCE’s revised, supplemental testimony is not due until February 28, 2013. ACR at p. 6.

prejudice any party. Accordingly, First Solar requests that the Commission grant this motion for party status.

IV. SERVICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to the following:

Rachel McMahon
Director of Regulatory Affairs
First Solar
525 Market Street, 15th Floor
San Francisco, CA 94105
Telephone: 415-935-2550
Facsimile: 415-935-2501
E-mail: rachel.mcmahon@firstsolar.com

IV. CONCLUSION

For the reasons stated in this motion, First Solar has a unique interest in this proceeding that cannot be fully represented by any other party. First Solar, therefore, respectfully requests the Commission grant this motion.

Respectfully Submitted,



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