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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the	)	
Commission's Procurement Incentive Framework	)	R.06-04-009
And to Examine the Integration of Greenhouse	)	(Filed April 13, 2006)
Gas Emissions Standards into Procurement Policies.	)	

MOTION FOR PARTY STATUS OF THE SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT

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February 26, 2007

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework And to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	))))	R.06-04-009 (Filed April 13, 2006)

MOTION FOR PARTY STATUS OF THE
SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT
AND POWER DISTRICT

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California ("CPUC"), the Salt River Project Agricultural Improvement and Power District ("SRP") hereby moves that the CPUC grant SRP party status in this proceeding.

I. SRP's Interests in This Proceeding

SRP seeks party status at this time for three reasons. First, SRP is a co-owner of the Four Corners Generating Station in New Mexico ("Four Corners") and, along with Southern California Edison Company ("SCE") and other co-owners, SRP has contractual obligations to make certain decisions regarding the continued maintenance and operation of that power plant. SRP, as an agricultural improvement and power district, is a political subdivision of the State of Arizona. Although SRP itself is not regulated by the CPUC, it has a pecuniary interest in the Interim Opinion on Phase I Issues: Greenhouse Gas Emissions Performance Standard ("Interim Opinion"),[1] decided January 25, 2007, as it affects SCE because of its status as a co-owner of Four Corners. SRP's ability to make future investments in, and to expend funds associated with, Four Corners may be adversely affected by any restrictions, including the potential limitations of the emissions performance standard set forth in the Interim Opinion, on SCE's ability to fulfill its

[1] Interim Opinion, Decision 07-01-039 (January 25, 2007).

contractual obligation regarding financial investments and continued funding of operations and maintenance of the power plant. Therefore, SRP requests party status to allow it to participate in the rulemaking proceeding regarding the greenhouse gas emissions performance standard.

Second, in response to the Comments of SCE (U 338-E) on the Proposed Decision of President Peevey and ALJ Gottstein, filed on January 2, 2007, the CPUC suggests in the Interim Opinion that SCE should file an application or a petition for modification relating to the specific contractual obligations at Four Corners. Thus, SRP seeks party status to enable it to participate in further proceedings in the event that SCE files such an application or petition for modification.

Finally, SRP's interests in this proceeding stem from the fact that decision is an interim emissions performance standard for greenhouse gases, and that the CPUC may continue the proceeding. The Interim Opinion states that the emissions performance standard adopted therein serves "as a near-term bridge until an enforceable GHG emissions limit applicable to LSEs is established and in operation" and "[a]t that time, as directed by SB 1368, we will reevaluate and continue, modify or replace this standard through a rulemaking proceeding, and in consultation with the California Energy Commission (CEC) and the California Air Resources Board (CARB)."[2] Therefore, SRP desires to become a party in order to allow it to participate in any future matters undertaken in this proceeding relating to the greenhouse gas emissions performance standard.

SRP requests that the following persons be added to the official service list for this referenced proceeding, and that they be copied on all future pleadings, correspondence, CPUC orders or other communications:

[2] Interim Opinion, at 2.

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II. Conclusion

For the reasons set forth herein, and in compliance with Rule 1.4, SRP moves for party status in this proceeding and requests that it be placed on the service list as a party to this proceeding.

Dated: February 26, 2007

Respectfully submitted,

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Certificate of Service

I hereby certify that I have on this day served a copy of this Motion for Party Status of Salt River Project Agricultural Improvement and Power District on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named with an e-mail address in the official service list dated February 21, 2007. Parties without e-mail addresses, Commissioner Michael R. Peevey, Administrative Law Judge Charlotte TerKeurst, Administrative Law Judge Jonathan Lakritz, and Administrative Law Judge Meg Gottstein, were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on February 26, 2007.

__/s/ Rebecca C. Goldberg_____

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CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0604009 - CPUC - PG&E, SDG&E,
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