

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

11/20/23

Rulemaking 23-10-003:52 PM  
(Filed October 12, 2023) 10011

Order Instituting Rulemaking to Oversee the  
Resource Adequacy Program, Consider  
Program Reforms and Refinements, and  
Establish Forward Resource Adequacy  
Procurement Obligations.

**MOTION OF  
THE LARGE-SCALE SOLAR ASSOCIATION  
FOR PARTY STATUS**

November 20, 2023

**SHANNON EDDY**

Executive Director

Large-scale Solar Association

2501 Portola Way

Sacramento, CA 95818

Telephone: (415) 819-4285

E-mail: [shannon@largescalesolar.org](mailto:shannon@largescalesolar.org)

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the  
Resource Adequacy Program, Consider  
Program Reforms and Refinements, and  
Establish Forward Resource Adequacy  
Procurement Obligations.

Rulemaking 23-10-011  
(Filed October 12, 2023)

**MOTION OF  
THE LARGE-SCALE SOLAR ASSOCIATION  
FOR PARTY STATUS**

The Large-Scale Solar Association (“LSA”) respectfully moves for party status in Rulemaking (“R.”) 23-10-011 (Resource Adequacy (“RA”). This Motion is filed and served pursuant to Rule 1.4(a)(4) and (b) of the Commission’s Rules of Practice and Procedure. LSA has also submitted Reply Comments on the Order Instituting Rulemaking (“OIR”) concurrent with this Motion.

**I.  
DESCRIPTION OF LSA (Rule 1.4(b)(1))**

LSA is a non-partisan association of solar and battery storage developers that advocates appropriate policies to enable market penetration of utility-scale solar technologies in California and the Western United States. LSA’s members are leaders in the utility-scale solar industry with deep experience in all disciplines necessary to site develop, engineer, construct, finance and operate utility scale solar and battery storage systems. LSA’s member companies are principally responsible for developing most of the operational and planned solar and storage capacity in California today. In addition to a deep appreciation of what it takes to bring solar and storage capacity on-line, LSA members are also profoundly aware of the many challenges that must be addressed with urgency to achieve the state’s aggressive goals for incremental solar capacity between now and 2035.

LSA is a party to and actively participating in other Commission proceedings, including, but not limited to the previous RA proceeding (R.21-10-002), Integrated Resource Planning (“IRP”) (R.20-05-003), and General Order 131-D (R.23-05-018).

**II.**  
**LSA’S INTEREST IN THIS PROCEEDING (Rule 1.4(b)(2))**

LSA is seeking party status in this proceeding because the decisions made in this proceeding are of direct consequence to LSA. As demonstrated in LSA’s Reply Comments on the OIR submitted concurrently with this Motion, LSA generally supports the scope for this RA proceeding, but requests that the Commission consider one additional issue regarding value of co-located resources. LSA is unable to attend the Prehearing Conference due to the Holiday, but LSA plans to actively participate in this proceeding by submitting Comments on Rulings and Proposed Decisions and participating in workshops.

**III.**  
**REQUESTED RELIEF**

For the reasons stated above, LSA has a direct and substantial interest in the RA Rulemaking. LSA, therefore, moves the Commission to grant LSA party status in R.23-10-011 (RA) for the purpose of participating actively in this proceeding, including participation in hearings and workshops and submission of authorized formal pleadings.

LSA further asks that the service list include as a party, and all communications be made to, the following representative for LSA:

**SHANNON EDDY**  
Executive Director  
Large-scale Solar Association  
2501 Portola Way  
Sacramento, CA 95818  
Telephone: (415) 819-4285  
E-mail: [shannon@largescalesolar.org](mailto:shannon@largescalesolar.org)

Dated: November 20, 2023

Respectfully submitted,

/s/ SHANNON EDDY

Shannon Eddy

Executive Director

Large-scale Solar Association

2501 Portola Way

Sacramento, CA 95818

Telephone: (415) 819-4285

E-mail: [shannon@largescalesolar.org](mailto:shannon@largescalesolar.org)