

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

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Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations.	Rulemaking 09-10-032
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**MOTION OF THE LARGE-SCALE SOLAR ASSOCIATION  
FOR PARTY STATUS**

Shannon Eddy  
Executive Director  
Large Scale Solar Association  
2501 Portola Way  
Sacramento, CA 95818  
(916) 731-8371  
eddyconsulting@gmail.com

December 15, 2010

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Pursuant to Commission Rule of Practice and Procedure 1.4, the Large-Scale Solar Association (“LSA”) moves to be granted party status in the Rulemaking 09-10-032.

LSA represents twelve of the nation’s largest developers and providers of utility-scale solar generation resources. Collectively, LSA’s members have contracted to provide over 6.5 gigawatts (“GW”) of clean, sustainable solar power under contract to California’s load-serving entities. LSA members develop, own and operate various types of utility-scale solar technologies, including photovoltaic and solar thermal system designs.

Recent filings in this proceeding by the California Independent System Operator and Pacific Gas & Electric Company indicate that renewable net qualifying capacity (“NQC”) and integration issues may be addressed in Phase II of this proceeding. LSA seeks intervention in this proceeding to provide its input on these Phase II issues. In particular, to the extent that this proceeding will be addressing the NQC of solar based on expectations of the amount of generation expected from new solar resources, LSA will help to provide the perspective of the solar industry to inform this process.

LSA supports the Commission’s consideration of including operational characteristics in the Commission’s resource adequacy requirements. CAISO’s recent *Motion for Expansion of the Phase 2 Scope to Include a Proposal for Procurement of Non-*

*Generic Capacity through the Resource Adequacy Program* could provide a mechanism to institutionalize reasoned consideration of the system's operational needs as renewable generation grows. LSA seeks to ensure that any operational procurement requirements complement - and are not duplicative of - renewable integration procurement authorized in other Commission proceedings. LSA supports the CAISO's efforts to account for the current operational flexibility of the fleet and to monitor the flexibility of the system as California moves towards achieving its renewable policy goals.

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

Shannon Eddy  
Executive Director  
Large-Scale Solar Association  
2501 Portola Way  
Sacramento, CA 95818  
(916) 731-8371  
[eddyconsulting@gmail.com](mailto:eddyconsulting@gmail.com)

Kristin Burford (email only)  
Policy Director  
Large-Scale Solar Association  
[kristin@consciousventuresgroup.com](mailto:kristin@consciousventuresgroup.com)

Respectfully submitted,

By: /s/ Shannon Eddy  
Shannon Eddy  
Executive Director, Large Scale Solar  
Association

December 15, 2010

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **MOTION OF THE LARGE-SCALE SOLAR ASSOCIATION FOR PARTY STATUS** on all parties of record in R.09-10-032 by transmitting an email message with the document attached to their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on December 15, 2010, at San Rafael, California.

*/s/ Kristin Burford*  
Kristin Burford