

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish  
Policies, Processes, and Rules to Ensure  
Reliable Electric Service in California in  
the Event of an Extreme Weather Event in  
2021.

Rulemaking 20-11-003  
(Filed November 19, 2020)

**MOTION OF THE DR COALITION FOR ADMISSION OF THE DR COALITION'S  
OPENING AND REBUTTAL TESTIMONY INTO THE RECORD**

Dated: February 3, 2021

Greg Wikler  
Executive Director  
California Efficiency + Demand  
Management Council  
1111 Broadway, Suite 300  
Oakland, CA 94607  
Telephone: 925-286-1710  
E-mail: [policy@cedmc.org](mailto:policy@cedmc.org)

Luke Tougas  
Consultant for  
California Efficiency + Demand  
Management Council  
1111 Broadway, Suite 300  
Oakland, CA 94607  
Telephone: 510-326-1931  
E-mail: [l.tougas@cleanenergyresearch.com](mailto:l.tougas@cleanenergyresearch.com)

Daniel W. Douglass  
DOUGLASS, LIDELL & KLATT  
5737 Kanan Road, Suite 610  
Agoura Hills, CA 91301  
Telephone: (818) 961-3001  
E-mail: [douglass@energyattorney.com](mailto:douglass@energyattorney.com)  
On Behalf of Google LLC

Andrew Hoffman  
Chief Development Officer  
Leapfrog Power, Inc.  
1700 Montgomery Street, Suite 200  
San Francisco, CA 94111  
Telephone: (415) 409-9783  
E-mail: [marketdev@leap.energy](mailto:marketdev@leap.energy)

Travis Kavulla  
Vice President, Regulatory Affairs  
NRG Energy, Inc.  
804 Carnegie Center  
Princeton, NJ 08540  
Telephone: (609) 524-4696  
E-mail: [travis.kavulla@nrg.com](mailto:travis.kavulla@nrg.com)

John Anderson  
Director of Energy Markets  
OhmConnect, Inc.  
610 16<sup>th</sup> Street, Suite M20  
Oakland, CA 94612  
Telephone: (415) 697-1271  
E-mail: [john@ohmconnect.com](mailto:john@ohmconnect.com)

Charlie Buck  
Director, Regulatory Affairs – West  
Oracle  
475 Sansome Street, 15<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 767-8784  
E-mail: [charlie.buck@oracle.com](mailto:charlie.buck@oracle.com)

Greg Dixon  
Chief Executive Officer  
Voltus, Inc.  
2443 Fillmore St.  
San Francisco, CA 94115  
Telephone: (415) 463-4236  
E-mail: [greggdixon@voltus.co](mailto:greggdixon@voltus.co)

Damon Franz  
Managing Policy Advisor  
Tesla, Inc.  
901 Page Avenue  
Fremont, CA 94538  
Telephone: (650) 339-6091  
E-mail: [dfranz@tesla.com](mailto:dfranz@tesla.com)

Dr. Ken Skinner  
Policy Advisor  
Willdan Group, Inc.  
2401 E. Katella, Suite 300  
Anaheim, CA 92806  
Telephone: (513) 265-7185  
E-mail: [kskinner@willdan.com](mailto:kskinner@willdan.com)

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Reliable Electric Service in California in the Event of an Extreme Weather Event in 2021.

Rulemaking 20-11-003  
(Filed November 19, 2020)

**MOTION OF THE DR COALITION FOR ADMISSION OF THE DR COALITION'S  
OPENING AND REBUTTAL TESTIMONY INTO THE RECORD**

The California Efficiency + Demand Management Council, Google LLC, Leapfrog Power, Inc., NRG Energy, Inc., OhmConnect, Inc., Oracle, Tesla, Voltus, Inc., and Willdan (collectively "The DR Coalition") respectfully move for the admission of the following into the record of this proceeding:

- (1) Opening Prepared Testimony of the DR Coalition, which is also identified as Exhibit No. DR Coalition-01, is dated January 11, 2021, and was served on the service list in R.20-11-003 and submitted as a "Supporting Document" on the Commission's E-File website on January 11, 2021; and
- (2) Rebuttal Prepared Testimony of the DR Coalition, which is also identified as Exhibit No. DR Coalition-02, is dated January 19, 2021, and was served on the service list in R.20-11-003 and submitted as a "Supporting Document" on the Commission's E-File website on January 19, 2021.

This Motion is timely filed and served pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure and the Administrative Law Judge's (ALJ's) Email Ruling of January 22, 2021 (January 22 ALJ's Email Ruling).

Specifically, the January 22 ALJ's Email Ruling directed that: "Parties that timely served opening and reply testimony shall move to introduce the evidence into the record no later than February 5, 2021." The DR Coalition's Opening Testimony and Rebuttal Testimony have fully complied with Rule 13.8 of the Commission's Rules of Practice and Procedure, having been

timely served on January 11, 2021, and January 19, 2021, respectively, pursuant to the schedule adopted for this testimony by the Assigned Commissioner's Scoping Memo (December 21, 2020) and the ALJ's Ruling modifying the schedule (December 30, 2020).

In further compliance with the Commission's Rules of Practice and Procedure (Rule 13.7(f)), the DR Coalition's Opening Testimony and Rebuttal Testimony were also uploaded as Supporting Documents on the Commission's E-File website on the same day they were served. The Commission has published each as a Supporting Document on its website with the following links:

- (1) The DR Coalition's Opening Testimony:  
<https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2011003/3319/359865093.pdf> and
- (2) The DR Coalition's Rebuttal Testimony:  
<https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2011003/3346/360563775.pdf>

Having timely complied with all requirements for the service and submission of this testimony, the DR Coalition moves for the admission of the DR Coalition's Opening Testimony (Exhibit DR Coalition-01) and the DR Coalition's Rebuttal Testimony (Exhibit DR Coalition-02) into the evidentiary record of R.20-11-003 (Emergency Reliability).

Respectfully submitted,

February 3, 2021

/s/ GREG WIKLER  
Greg Wikler  
On Behalf of the California Efficiency +  
Demand Management Council, Google LLC,  
Leapfrog Power, Inc., NRG Energy, Inc.,  
OhmConnect, Inc., Oracle, Tesla, Voltus,  
Inc., and Willdan  
1111 Broadway, Suite 300  
Oakland, CA 94607  
Telephone: 925-286-1710  
E-mail: [policy@cedmc.org](mailto:policy@cedmc.org)