

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Application of the Solar Energy  
Industries Association for Rehearing of  
Resolution E-5150.

Application 21-07-013  
(Filed July 28, 2021)

**MOTION OF  
CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL  
FOR PARTY STATUS**

Date: August 12, 2021

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The California Efficiency + Demand Management Council (“The Council”)<sup>1</sup> respectfully moves for party status in Application (A.) 21-07-013 which is the Application of the California Solar & Storage Association, the Solar Energy Industries Association, and Vote Solar for Rehearing of Resolution E-5150 (“Application for Rehearing”). This Motion is timely filed and served pursuant to the California Public Utility Commission’s (“Commission’s” or “CPUC’s”) Rules of Practice and Procedure. Resolution E-5150 adopts updates to the Avoided Cost Calculator (“ACC”) for use in demand-side distributed energy resource (“DER”) cost-effectiveness analysis. Resolution E-5150 was issued on June 28, 2021. Thereafter, on July 28, 2021, the California Solar & Storage Association, Solar Energy Industries Association, and Vote Solar (collectively “the Applicants”) submitted an Application for Rehearing.

**I. DESCRIPTION OF THE COUNCIL (RULE 1.4(b)(1))**

The Council is a statewide trade association of non-utility businesses that provide energy efficiency (“EE”), demand response (“DR”), and data analytics services and products in California.<sup>2</sup> Our member companies employ many thousands of Californians throughout the state. They include EE, demand response DR, and grid services technology providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and manufacturers of EE products and equipment. The Council’s mission is to support appropriate EE, DR, and distributed energy resources (“DER”) policies, programs, and technologies to create sustainable

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<sup>1</sup> The views expressed by the California Efficiency + Demand Management Council are not necessarily those of its individual members.

<sup>2</sup> Additional information about the Council, including the organization’s current membership, Board of Directors, antitrust guidelines and code of ethics for its members, can be found at <http://www.cedmc.org>. The views expressed by the Council are not necessarily those of its individual members.

jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

The Council regularly participates before the Commission to support appropriate EE, DR, and DER policies, programs and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement. The Council is a party to numerous Commission proceedings, including, but not limited to the Resource Adequacy (RA) Rulemaking (R.19-11-009), DR proceedings (R.13-09-011 and A.17-01-012 et al.), EE proceedings (R.13-11-005 and A.17-01-013, et al.), Integrated Distributed Energy Resources (IDER) rulemaking (R.14-10-003), Distribution Resources Plans proceeding (R.14-08-013, et al.) and the Integrated Resource Plan (IRP) rulemaking (R.16-02-007). The Council previously commented on May 24<sup>th</sup> in response to Draft Resolution E-5150.<sup>3</sup>

## **II. THE COUNCIL’S INTEREST IN THIS PROCEEDING (Rule 1.4(b)(2))**

The Council seeks party status at this time to support the Applicants’ Application for Rehearing of Resolution E-5150 (the “Resolution”). Many of the Council’s positions are demonstrated in its Response which has been filed and served on the same date as this Motion. The Council agrees with many of the assertions made by the Applicants, including that the updates were not “minor” in nature as claimed, and that the CPUC did not provide sufficient time to review substantial new technical data. For these reasons, the ACC should not have been approved through the resolution process.

## **III. REQUESTED RELIEF**

For the reasons stated above, the Council moves the Commission to grant the Council party status in A.21-07-013 (AFR) for the purpose of actively participating in this proceeding. The Council further asks that the service list include as a party, and all communications be made to, the following representative for the Council:

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<sup>3</sup> Comments of the California Efficiency + Demand Management Council on Draft Resolution E-5150 which Adopts Updates to the Avoided Cost Calculator for Use in Demand-Side Distributed Energy Resource Cost-Effectiveness Analyses. Available at: <https://cedmc.org/wp-content/uploads/2021/05/E-5150-Avoided-Cost-Calculator-Council-Comments-on-Draft-Resolution-5.24.2021.pdf>

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**V. CONCLUSION**

The Council's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in this proceeding. For the reasons stated above, the Council respectfully requests that the Commission grant this Motion for Party Status.

Dated: August 12, 2021

Respectfully submitted,

/s/ SERJ BERELSON

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