BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



Application of Pacific Gas and Electric Company (U39E) for Approval of Demand Response Programs, Pilots and Budgets for Program Years 2018-2022. Application 17-01-012 (Filed January 17, 2017)

And Related Matters.

Application 17-01-018 Application 17-01-019

MOTION OF LEAPFROG POWER, INC. FOR PARTY STATUS

Dated: January 11, 2019

Andrew Hoffman
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MOTION OF LEAPFROG POWER, INC. FOR PARTY STATUS

Leapfrog Power, Inc. (Leapfrog) respectfully moves for party status in Application (A.) 17-01-012 (Demand Response Applications). This Motion is filed and served pursuant to Rule 1.4(a)(4) and (b) of the Commission's Rules of Practice and Procedure.

I. DESCRIPTION OF LEAP (Rule 1.4(b)(1))

Leap is a Demand Response Provider (DRP) founded in 2017 and headquartered in San Francisco, California. The company provides Demand Response (DR) services to residential, commercial, industrial, and agricultural customers throughout the state of California. Through its technology platform, Leap enables distributed energy resource providers in California to become grid participants, both adding revenue for their customers and integrating additional demand-side resources into California electricity system. Leap believes that demand-side resources integrated into California's wholesale electricity market will play a key role in helping California achieve a resilient and zero carbon future.

Leap is a registered DRP, as well as registered Scheduling Coordinator, with the California Independent System Operator Corporation (CAISO). Leap is a participant in the 2019 Demand Response Auction Mechanism (DRAM) pilot and holds contracts with Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) to deliver DRAM capacity in the 2019 delivery year.

II. LEAP'S INTEREST IN THIS PROCEEDING (Rule 1.4(b)(2))

Leap is seeking party status in this proceeding because as an existing DRAM participant and a California DRP, the decisions made in this proceeding are of direct consequence to Leap. In addition, Leap would like to file comments pursuant to the Administrative Law Judge's Ruling Issuing Evaluation Report of the Demand Response Auction Mechanism Pilot, Noticing January 16, 2019 Workshop, and Denying Motion to Require Audit Reports in the Evaluation Report, issued January 4, 2019 (ALJ Ruling). The ALJ Ruling invited parties to file proposed improvements to the DRAM which will be further discussed at the January 16, 2019 DRAM Workshop. As such, Leap has filed and served, concurrently with this Motion, its Proposed Improvements to the DRAM.

Additionally, as a current DRAM participant Leap wishes to contribute its valuable experience to date in order to improve DRAM for future years. Leap believes that wholesale market integrated DR will play a critical role in helping the state to achieve its zero carbon goals economically. DRAM is the primary mechanism wherein non-utility DRPs can earn Resource Adequacy capacity payments for DR resources, and as such its continuation and improvement are of critical importance to Leap.

III. REQUESTED RELIEF

For the reasons stated above, Leap has a direct and substantial interest in the DR

Applications, as further evidenced by its Proposed Improvements to the DRAM, filed and served

concurrently with this Motion. Leap, therefore, moves the Commission to grant Leap party

status in A.17-01-012, et al. (DR Applications) for the purpose of participating actively in this

proceeding, including participation in hearings and workshops, submission of authorized formal

pleadings and participation in all other matters scheduled and required in this proceeding. Leap

also requests that this Commission accept Leap's Proposed Improvements to DRAM which were

filed and served concurrently with this Motion for filing in this docket.

Leap further asks that the service list include as a party, and all communications be made

to, the following representative for Leap:

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Dated: January 11, 2019

/s/ ANDREW HOFFMAN

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