

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

DOCKET

08-AFC-13C

DATE APR 18 2011

RECD. APR 18 2011

In the Matter of:

Petition to Amend the Calico Solar
Project

Docket No. 08-AFC-13C

PETITION TO INTERVENE BY
CALIFORNIA UNIONS FOR RELIABLE ENERGY

April 18, 2011

Tanya A. Gulesserian
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
tgulesserian@adamsbroadwell.com

On behalf of the CALIFORNIA
UNIONS FOR RELIABLE ENERGY

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

Petition to Amend the Calico Solar
Project

Docket No. 08-AFC-13C

**PETITION TO INTERVENE BY
CALIFORNIA UNIONS FOR RELIABLE ENERGY**

Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulations, California Unions for Reliable Energy ("CURE") petitions to intervene in this proceeding.

Section 1207(a) grants "any person" the right to file a petition to intervene in any proceeding. The petition must set forth "the grounds for the intervention, the position and interest of the petitioner in the proceeding, the extent to which the petitioner desires to participate in the proceedings, and the name, address, and telephone number of the petitioner." Section 1207(c) provides that the "presiding member may grant leave to intervene to any petitioner to the extent" the presiding member "deems reasonable and relevant...."

CURE is a coalition of unions whose members construct and operate power plants in California. Thus, the project directly affects the union members' immediate economic interests.

The project also affects the union members' long-term economic and environmental interests. Environmental degradation jeopardizes future jobs by causing construction moratoriums, depleting limited air pollutant emissions offsets, using limited fresh water, and putting other stresses on the environmental carrying capacity of the state. This reduces future employment opportunities. In contrast, well designed projects that reduce environmental impacts of electricity generation improve long-term economic prospects.

Union members are concerned about projects that cause serious environmental harm without providing countervailing economic benefits. The Commission's application process provides for a balancing of the project's socioeconomic and environmental impacts. CURE's ultimate position in this proceeding will be determined based on all of the factors that will be considered by the Commission.

CURE was granted intervention in the application proceeding for the Calico Solar Project. CURE has been granted intervention in many other siting cases brought before the Commission since the enactment of AB 1890. The Commission rejected the only challenge to CURE's participation in those cases, finding CURE's interests "undeniably relevant" to the proceedings. (In

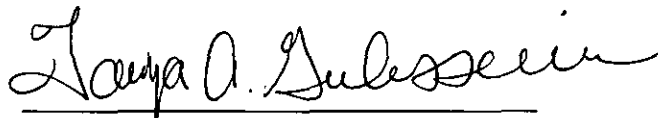
the Matter of Application for Certification for the High Desert Power Project, Docket No. 97-AFC-1, Order Granting Petition to Intervene at 2 (Dec. 24, 1997)). The same decision should be reached here.

CURE wishes to participate fully in all phases of this proceeding. Filings should be served on CURE at the address listed below.

For the foregoing reasons, CURE respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow CURE to participate as a party.

Dated: April 18, 2011

Respectfully submitted,



Tanya A. Gulesserian
Tanya A. Gulesserian
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
tgulesserian@adamsbroadwell.com

On behalf of the CALIFORNIA UNIONS
FOR RELIABLE ENERGY

Calico Solar – 08-AFC-13
DECLARATION OF SERVICE

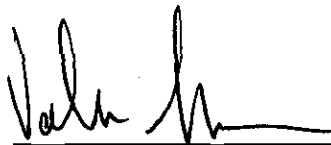
I, Valerie Stevenson, declare that on April 18, 2011, I served and filed copies of the attached PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY, dated April 18, 2011. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at www.energy.ca.gov/sitingcases/calicosolar/CalicoSolar_POS.pdf. The document has been sent to both the other parties in this proceeding as shown on the Proof of Service list and to the Commission's Docket Unit *electronically to all email addresses on the Proof of Service list; and by depositing in the U.S. mail at Sacramento, CA, with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses NOT marked "email preferred."*

AND

By sending an original paper copy and one electronic copy, mailed and emailed respectively to:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-13
1516 Ninth Street, MS 4
Sacramento, CA 95814-5512
docket@energy.state.us.ca.

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, CA, on April 18, 2011.



Valerie Stevenson



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

For the CALICO SOLAR AMENDMENT

**Docket No. 08-AFC-13C
PROOF OF SERVICE**

APPLICANT

Daniel J. O'Shea
Managing Director
Calico Solar, LLC
2600 10th Street, Suite 635
Berkeley, CA 94710
dano@kroadpower.com

CONSULTANT

Angela Leiba
AFC Project Manager
URS Corporation
*4225 Executive Square, #1600
La Jolla, CA 92037
angela_leiba@URSCorp.com

APPLICANT'S COUNSEL

Allan J. Thompson
Attorney at Law
21 C Orinda Way #314
Orinda, CA 94563
allanori@comcast.net

Ella Foley Gannon, Partner
Bingham McCutchen, LLP
Three Embarcadero Center
San Francisco, CA 94111
ella.gannon@bingham.com

INTERESTED

AGENCIES/ENTITIES/PERSONS

California ISO
e-recipient@caiso.com

Jim Stobaugh
BLM – Nevada State Office
P.O. Box 12000
Reno, NV 89520
jim_stobaugh@blm.gov

Rich Rotte, Project Manager
Bureau of Land Management
Barstow Field Office
2601 Barstow Road
Barstow, CA 92311
richard_rotte@blm.gov

Becky Jones
California Department of
Fish & Game
36431 41st Street East
Palmdale, CA 93552
dfgpalm@adelphia.net

County of San Bernardino
Ruth E. Stringer,
County Counsel
Bart W. Brizzee,
Deputy County Counsel
385 N. Arrowhead Avenue,
4th Floor
San Bernardino, CA 92415-
bbrizzee@cc.sbcounty.gov

California Unions for Reliable
Energy (CURE)
c/o: Tanya A. Gulesserian,
Jason W. Holder
Adams Broadwell Joseph
& Cardozo
601 Gateway Boulevard,
Ste. 1000
South San Francisco, CA
94080
tgulesserian@adamsbroadwell.com
jholder@adamsbroadwell.com

Defenders of Wildlife
Joshua Basofin
1303 J Street, Suite 270
Sacramento, California 95814
E-Mail Service Preferred
jbasofin@defenders.org

Society for the Conservation of
Bighorn Sheep
Bob Burke & Gary Thomas
P.O. Box 1407
Yermo, CA 92398
cameracoordinator@sheepsociety.com

Basin and Range Watch
Laura Cunningham &
Kevin Emmerich
P.O. Box 70
Beatty, NV 89003
atomictoandranch@netzero.net

INTERESTED
AGENCIES/ENTITIES/PERSONS

Patrick C. Jackson
600 N. Darwood Avenue
San Dimas, CA 91773
E-Mail Service Preferred
ochsjack@earthlink.net

Gloria D. Smith, Senior
Attorney
Travis Ritchie
Sierra Club
85 Second Street, Second floor
San Francisco, CA 94105
E-Mail Service Preferred
gloria.smith@sierraclub.org
travis.ritchie@sierraclub.org

Newberry Community
Service District
Wayne W. Weierbach
P.O. Box 206
Newberry Springs, CA 92365
newberryCSD@gmail.com

Cynthia Lea Burch
Steven A. Lamb
Anne Alexander
Katten Muchin Rosenman,
LLP
2029 Century Park East,
Suite 2600
Los Angeles, CA 90067-3012
Cynthia.burch@kattenlaw.com
Steven.lamb@kattenlaw.com
Anne.alexander@kattenlaw.com

ENERGY COMMISSION

Kourtney Vaccaro
Hearing Officer
kvaccaro@energy.state.ca.us

Kerry Willis
Staff Counsel
kwillis@energy.state.ca.us

Steve Adams
Co-Staff Counsel
sadams@energy.state.ca.us

Craig Hoffman
Project Manager
choffman@energy.state.ca.us

Jennifer Jennings
Public Adviser
E-Mail Service Preferred
publicadviser@energy.state.ca.us