STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

The Application for Certification for the Genesis Solar Energy Project

PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY

December 4, 2009

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

Attorneys for the 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 which sets 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 he deems reasonable and relevant . . . .”

CURE is a coalition of unions whose members help solve California’s energy problems by building, maintaining, and operating conventional and renewable energy power plants. The Genesis Solar Energy Project proposes the construction, maintenance, and operation of two 125 megawatt (MW) solar electric generating facilities in Riverside County. Thus, the project directly affects the union members’ immediate economic interests.

CURE is equally committed to building both a strong economy and a healthy environment. Poorly designed renewable energy power plants may degrade the environment with noise and visual intrusion, water and soil pollution, and destruction of archaeological or wildlife habitat areas. Environmental degradation jeopardizes future jobs by causing construction moratoriums, depleting limited air pollutant emissions offsets, using limited
fresh water, and putting added 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.

CURE has an interest in the economic and environmental impacts of the Genesis Solar Energy Project. Union members are concerned about projects that cause serious environmental hardship without providing countervailing economic benefits. The Commission’s application process provides for a balancing of the Project’s socio-economic 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 has been granted intervention in most 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: December 4, 2009

Respectfully submitted,

/s/
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

Attorneys for the CALIFORNIA UNIONS FOR RELIABLE ENERGY
Declaration of Service

I Bonnie Heeley declare that on December 4, 2009, I served and filed copies of the attached Petition to Intervene by California Unions for Reliable Energy dated December 4, 2009. The original document, filed with the Docket Office, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:
http://www.energy.ca.gov/sitingcases/genesis_solar.

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 Office via email and U.S. mail.

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, CA on December 4, 2009.

__________________________
Bonnie Heeley

<table>
<thead>
<tr>
<th>CALIFORNIA ENERGY COMMISSION</th>
<th>Ryan O'Keefe, Vice President Genesis Solar LLC 700 Universe Boulevard Juno Beach, Florida 33408 <a href="mailto:Ryan.okeefe@nexteraenergy.com">Ryan.okeefe@nexteraenergy.com</a></th>
<th>Scott Busa/Project Director Meg Russell/Project Manager Duane McCloud/Lead Engineer NextEra Energy 700 Universe Boulevard Juno Beach, FL 33409 <a href="mailto:Scott.busa@nexteraenergy.com">Scott.busa@nexteraenergy.com</a> <a href="mailto:Meg.Russell@nexteraenergy.com">Meg.Russell@nexteraenergy.com</a> <a href="mailto:Daune.mccloud@nexteraenergy.com">Daune.mccloud@nexteraenergy.com</a></th>
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<tr>
<td>Mike Pappalardo</td>
<td>Diane Fellman/Director West Region Regulatory Affairs 234 Van Ness Avenue San Francisco, CA 94102 <a href="mailto:Daine.fellman@nexteraenergy.com">Daine.fellman@nexteraenergy.com</a></td>
<td>Tricia Bernhardt/Project Manager Tetra Tech, EC 143 Union Boulevard, Suite 1010 Lakewood, CO 80228 <a href="mailto:Tricia.bernhardt@tteci.com">Tricia.bernhardt@tteci.com</a></td>
</tr>
<tr>
<td>Permitting Manager 3368 Videra Drive Eugene, OR 97405 <a href="mailto:Mike.pappalardo@nexteraenergy.com">Mike.pappalardo@nexteraenergy.com</a></td>
<td></td>
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<tr>
<td>Christo Nitoff/Project Engineer Worly Parsons 2330 E. Bidwell St., Ste 150 Folsom, CA 95630 <a href="mailto:Christo.Nitoff@worleyparsons.com">Christo.Nitoff@worleyparsons.com</a></td>
<td>Scott Galati Galati &amp; Blek, LLP 455 Capitol Mall, Suite 350 Sacramento, CA 95814 <a href="mailto:sgalati@gb-llp.com">sgalati@gb-llp.com</a></td>
<td>California ISO <a href="mailto:e-recipient@caiso.com">e-recipient@caiso.com</a> VIA EMAIL ONLY</td>
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<td></td>
<td></td>
<td>James D. Boyd Vice Chair/Presiding Member California Energy Commission 1516 Ninth Street Sacramento, CA 95814 <a href="mailto:jboyd@energy.state.ca.us">jboyd@energy.state.ca.us</a></td>
</tr>
<tr>
<td>Allison Shaffer/Project Mgr. Bureau of Land Management Palm Springs South Coast Field Office 1201 Bird Center Drive Palm Springs, CA 92262 <a href="mailto:Allison_Shaffer@blm.gov">Allison_Shaffer@blm.gov</a></td>
<td>Julia Levin Commissioner/Presiding Member California Energy Commission 1516 Ninth Street Sacramento, CA 95814 <a href="mailto:jlevin@energy.state.ca.us">jlevin@energy.state.ca.us</a></td>
<td></td>
</tr>
<tr>
<td>Name</td>
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<td>Contact Information</td>
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<tr>
<td>Kenneth Celli, Hearing Officer</td>
<td>California Energy Commission</td>
<td><a href="mailto:kcelli@energy.state.ca.us">kcelli@energy.state.ca.us</a></td>
</tr>
<tr>
<td>Mike Monasmith, Siting Project Manager</td>
<td>California Energy Commission</td>
<td><a href="mailto:mmonasmi@energy.state.ca.us">mmonasmi@energy.state.ca.us</a></td>
</tr>
<tr>
<td>Caryn Holmes, Staff Counsel</td>
<td>California Energy Commission</td>
<td><a href="mailto:cholmes@energy.state.ca.us">cholmes@energy.state.ca.us</a></td>
</tr>
<tr>
<td>Robin Mayer, Staff Counsel</td>
<td>California Energy Commission</td>
<td><a href="mailto:rmayer@energy.state.ca.us">rmayer@energy.state.ca.us</a></td>
</tr>
<tr>
<td>Public Adviser's Office</td>
<td>California Energy Commission</td>
<td><a href="mailto:publicadviser@energy.state.ca.us">publicadviser@energy.state.ca.us</a></td>
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