

DOCKETED

Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	214378
Document Title:	PETITION TO INTERVENE BY FFIERCE
Description:	Application to Intervene by FFIERCE collective, represented by Grace Chang
Filer:	Grace Chang
Organization:	FFIERCE
Submitter Role:	Public
Submission Date:	11/4/2016 4:45:28 PM
Docketed Date:	11/4/2016

**PETITION TO INTERVENE BY
FFIERCE (Fighting for Informed Environmentally Responsible Clean Energy)**

Pursuant to Public Resources Code section 25214 and section 1211.7 of Title 20 of the California Code of Regulations, members of the collective group FFIERCE (Fighting for Informed Environmentally Responsible Clean Energy) petition to intervene in this proceeding. This petition sets forth the grounds for intervention and the position and interests of FFIERCE in the proceedings as required by the regulations. 20 C.C.R. § 1211.7 (a) (“The petition shall 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, mailing address, e-mail address, and telephone number of the petitioner.”)

FFIERCE is a collective group of concerned residents of Ventura County and/or faculty, staff and students of the University of California Santa Barbara dedicated to addressing issues of environmental justice and public health raised by the proposed siting of the Puente Power Plant project. The FFIERCE collective has been formed in recognition that we are or have been residents of the area within and beyond the six-mile radius serviced and impacted by the existing and proposed power plants. We do not wish to perpetuate the environmental harms and toxic racism wrought by these plants upon the poor, immigrant communities of color living and working in Oxnard. We seek public access, not only to participate in hearings on these proposed plants, but also the right to provide testimony and bring knowledge to bear on decisions about any such proposed projects. We also seek legitimate inquiries into alternative sources of clean and sustainable energy and storage, and the pursuit of these options for the future health of our people and planet.

FFIERCE collective members have participated in earlier hearings, workshops and other events (August 2015, July and September 2016) in proceedings before the Commission regarding the P3 project. We have also provided public comments following the release of the Preliminary Staff Assessment and subsequent hearings via the document “No on the Puente Power Project (P3), Statement of Opposition by UCSB Faculty and Students,” submitted by Grace Chang and signed by 32 others, on October 12, 2016.

Grace Chang is an Associate Professor in the Feminist Studies department at UCSB and is also faculty in the Interdepartmental PhD Emphasis in Environment and Society. She regularly teaches graduate and undergraduate level courses addressing social justice movements broadly, and environmental justice issues in particular, including case studies in the global climate justice movement and the current proposed power plant in Oxnard. She also teaches graduate courses in research methods. She could call upon colleagues among UCSB faculty in the Environment and Society emphasis as well as long-time leaders in the Environmental Justice movement, including experts from APEN (Asian Pacific Environmental Network) and the Grassroots Global Justice to provide testimony.

The interests of the members of the collective are directly affected by the project as past and present residents, homeowners, students and workers in the areas serviced by and

impacted by the current and proposed power plants at issue in this matter. These immediate interests include, but are not limited to: 1) The protection of the people living and working in these areas from adverse health and environmental impacts, many of which constitute environmental racism by definition. 2) The protection of the natural wildlife, environment and people from hazards wrought by the power plants in terms of harms to air, water and land integrity and quality. 3) Our commitment to the pursuit of environmental justice and climate justice through concrete measures such that the burden of power generation is equitably distributed, not disproportionately targeted to be carried by low-income communities of color. These would include seeking alternative energy sources as well as protective measures to reduce greenhouse gas emissions equitably across communities locally, regionally and statewide.

The FFIERCE collective's primary and foremost concerns within the Commission's review are Environmental Justice and Public Health, and all other areas of the project pertinent to these, including project description, project alternatives, compliance and closure, biological resources, soil and water resources, greenhouse gas emissions, air quality, worker safety/fire protection, hazardous materials management, cultural resources, and socioeconomics. The collective's concerns are also related to facility design, efficiency, reliability and transmission to the extent that these issues impact public health and environmental justice.

The FFIERCE collective wishes to participate fully in all phases of this proceeding and is committed to working with other parties to limit duplicative filings, testimony, cross examination, and briefing. The collective will be represented by Grace Chang in this matter. Contact information is as follows:

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This petition to intervene is timely and in keeping with the schedule set for this matter in the Revised Committee Scheduling Order dated October 14, 2016. (TN# 214018 [maintaining Nov. 4, 2016 as the last day to intervene].)

For the foregoing reasons, the FFIERCE collective respectfully requests that the Commission grant its petition to intervene in this proceeding and allow FFIERCE as represented by Dr. Grace Chang to participate as a party.

Dated: November 4, 2016
Respectfully submitted,
Grace Chang
On behalf of FFIERCE
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