<table>
<thead>
<tr>
<th><strong>Docket Number:</strong></th>
<th>07-AFC-06C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Title:</strong></td>
<td>Carlsbad Energy Center - Compliance</td>
</tr>
<tr>
<td><strong>TN #:</strong></td>
<td>202888</td>
</tr>
<tr>
<td><strong>Document Title:</strong></td>
<td>Simpson petition to intervene</td>
</tr>
<tr>
<td><strong>Description:</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Filer:</strong></td>
<td>Robert Simpson</td>
</tr>
<tr>
<td><strong>Organization:</strong></td>
<td>Helping Hand Tools (2HT) / Rob Simpson</td>
</tr>
<tr>
<td><strong>Submitter Role:</strong></td>
<td>Other Interested Person</td>
</tr>
<tr>
<td><strong>Submission Date:</strong></td>
<td>8/7/2014 7:34:25 AM</td>
</tr>
<tr>
<td><strong>Docketed Date:</strong></td>
<td>8/7/2014</td>
</tr>
</tbody>
</table>
IN THE MATER OF )
                  ) Docket Number 07-AFC-06 BandC
                  ) Rob Simpson
                  ) PETITION FOR INTERVENTION
Carlsbad Energy Center )
) 
**Petition to Remove Obsolete Facilities**
to Support Construction of the Carlsbad
**Energy Center Project**

and

**Petition to Amend the Carlsbad Energy**
**Center Project ________________**

Petitioner, Rob Simpson desires to participate fully with the rights and obligations of a party. (Cal. Code of Regs., tit. 20, § 1207)

Petitioner is a resident of California and a citizen of the United States of America and wishes to preserve his First Amendment right to “petition the Government for a redress of grievances.”

Petitioner has 2 children ages 14 and 16 for whom he intends to preserve the planets ability to maintain human life. Clean energy independence is his clearest path to this future. Petitioner also has family, friends and potential business in the area of the proposed plant. Petitioner interest is relevant to this particular proceeding as he considers the City of Carlsbad to be one of the most beautiful places in the State of California and has travelled there repeatedly for business and pleasure. Significant natural resources exist protected by a city government that has demonstrated leadership in environmental
stewardship. Petitioner also accepts the “Responsibility” identified in the California Environmental Quality Act.

(a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.

e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.

(f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.

(California Public Resources Code section 21000)

Petitioner has demonstrated an interest in California Energy production and power plant licensing before the Commission. Specifically, Russell City Energy Center, Eastshore Energy Center, East Altamont Energy Center, Humboldt Bay Repower Project, others and now Carlsbad Energy Center. Petitioner has prevailed in his appeal to the United States Environmental Protection Agency, Environmental Appeals Board (EAB) petition 08-01 regarding the inadequacies of the Russell City Energy Center Permit.

Petitioner has functioned as a consultant in Power plant licensing cases for the County of Alameda, the City of Hayward, Chabot Las Positas Community College, Golden Gate University, the Audubon Society, Hayward Area Planning Association, Communities for A Better Environment, Citizens Against Pollution, California Pilots Association, Californians for Renewable Energy as well as other community groups.
Petitioner believes that he brings a perspective to licensing cases that is often otherwise unavailable to persons involved in their first siting. It is his intent to provide an independent and informed citizens perspective to the licensing process and hopes that the public can participate to ensure that any plant licensed in California at minimum observes State and Federal requirements for the public protection and preservation of the environment. Petitioner desires to assure that the Carlsbad Energy Center employs Best Available Control Technology, site specific integration and provides full mitigation for all air quality and other identified impacts form the Energy Center. Petitioner will fully participate in the proceeding. Petitioner desires to present evidence and cross examine witnesses. Petitioner is represented by himself at this time. Petitioner agrees to electronic service. Petitioner was an intervener in the original AFC for this proceeding.

Respectfully submitted on October 8, 2014 By

Rob Simpson
Environmental Consultant
27126 Grandview Avenue Hayward CA 94542
510-909-1800 rob@redwoodrob.com

8/8/14
Date

original signed /
Rob Simpson
INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT
David Lloyd
Carlsbad Energy Center, LLC
1817 Aston Avenue, Suite 104
Carlsbad, CA 92008
David.Lloyd@nrgenergy.com

Tim Hemig, Vice President
Carlsbad Energy Center, LLC
1817 Aston Avenue, Suite 104
Carlsbad, CA 92008
Tim.Hemig@nrgenergy.com

APPLICANT’S CONSULTANTS
Robert Mason, Project Manager
CH2M Hill, Inc.
3 Hutton Centre Drive, Ste. 200
Santa Ana, CA 92707
robert.mason@ch2m.com

Megan Sebra
CH2M Hill, Inc.
2485 Natomas Park Drive, Ste. 600
Sacramento, CA 95833
Megan.Sebra@ch2m.com

COUNSEL FOR APPLICANT
John A. McKinsey
Stoel Rives LLP
980 Ninth Street, Ste. 1900
Sacramento, CA 95814
jamckinsey@stoel.com

INTERESTED AGENCIES
California ISO
P.O. Box 639014
Folsom, CA 95633-6014
e-recipient@caiso.com

City of Carlsbad
Joseph Garuba,
Municipals Project Manager Mana3ger
Ron Ball, Esq., City Attorney
1200 Carlsbad Village Drive
Carlsbad, CA 92008
jgaruba@ci.carlsbad.ca.us
rball@ci.carlsbad.ca.us

Allan J Thompson
Attorney for the City
21 "C" Orinda Way #314
Orinda, CA 94563
INTERVENORS

California Unions for Reliable Energy ("CURE")
Suma Peesapati
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
speesapati@adamsbroadwell.com

*Center for Biological Diversity
c/o William B. Rostov
EARTHJUSTICE
428 17th St., 5th Floor
Oakland, CA 94612
wrostov@earthjustice.org

ENERGY COMMISSION

JAMES D. BOYD
Commissioner and Presiding Member
jboyd@energy.state.ca.us

KAREN DOUGLAS
Commissioner and Associate Member
kidougla@energy.state.ca.us

Paul Kramer
Hearing Officer
pkramer@energy.state.ca.us

Mike Monasmith
Siting Project Manager
mmonasmi@energy.state.ca.us

Dick Rattiff
Staff Counsel
drattiff@energy.state.ca.us

Public Advisor's Office
peo@energy.state.ca.us
Declaration of Service

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

_____________________________