

## DOCKETED

<b>Docket Number:</b>	17-SPPE-01
<b>Project Title:</b>	McLaren Backup Generating Facility
<b>TN #:</b>	223158
<b>Document Title:</b>	rob simpson Comments petition to intervene
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*Comment Received From: rob simpson*

*Submitted On: 4/9/2018*

*Docket Number: 17-SPPE-01*

**petition to intervene**

*Additional submitted attachment is included below.*

State of California  
State Energy Resources Conservation and Development Commission

In the Matter of:	)	Docket # 17-SPPE-01
McLaren Backup Generating Facility	)	Petition for Intervention
	)	Helping Hand Tools (2HT)
	)	
_____	)	

PETITION TO INTERVENE OF HELPING HAND TOOLS (2HT)

Helping Hand Tools (2HT) hereby petitions to intervene in the proceeding for the Application for Certification of the McLaren Backup Generating Facility. Section 1207 of the Commission’s Rules of Practice and Procedure allow that, “Any person may file with the Docket Unit or the presiding committee member a petition to intervene in any proceeding. 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, address, and telephone number of the petitioner.”

2HT is a non-profit organization which has members throughout California including the project area. 2HT regularly opposes fossil fuel generation and promotes GHG free solutions. 2HT is particularly opposed to the use of large amounts of diesel backup generators and believes better alternatives are available. 2HT is alarmed that the applicant is refusing to provide CEC staff with air modelling of criteria pollutants other than NOx as requested in CEC Staff Data Request 7. We are also concerned that the NO<sub>2</sub> modeling is inadequate.

2HT is also concerned about the nitrogen deposition impacts to sensitive species that could potentially impact the special-status plant and wetland communities in the Guadalupe River corridor and Baylands Park.

It appears that the applicant is attempting to isolate the impacts of the McLaren Backup project from the cumulative impacts of the combined Vantage Data Center and McLaren Backup Generating Project this should not occur and 2HT will advocate for a complete assessment of the total project.

If granted intervention petitioner would like to participate in the topics of Alternatives, Air Quality, Public Health, Biology, and Reliability. We intend to participate fully in the proceeding with testimony, cross-examination and briefing.

Respectfully submitted,

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Rob Simpson  
Director 2HT  
Original signed and in  
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