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January 11, 2002

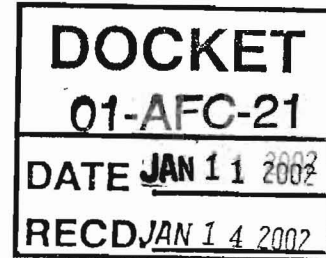
CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 01AFC21

Docket Unit, MS-4

1516 Ninth Street

Sacramento, CA 95814-5512



Re: In the Matter of the Application for Certification for TESLA POWER
PLANT PROJECT; Docket No. 01AFC21

Dear Madam or Sir:

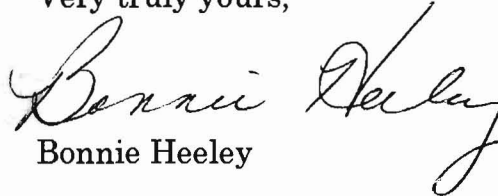
Enclosed are original and thirteen copies of

- (1) **PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR
RELIABLE ENERGY**

Please docket, conform and return one copy in the envelope provided.

Thank you for your assistance. If you have any questions, please call me.

Very truly yours,


Bonnie Heeley

:bh
Enclosures

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

Application for Certification for the
TESLA POWER PLANT PROJECT.

Docket No. 01-AFC-21

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

January 10, 2002

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Attorneys for CURE

PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY

Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulations, the 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 construct and operate power plants in California. The project therefore directly affects the union members' immediate economic interests.

The project also affects the union members' longer term economic and environmental interests. Environmental degradation jeopardizes future jobs by causing construction moratoriums, depleting limited air pollutant emissions offsets, consuming limited fresh water resources, and imposing other stresses on the environmental carrying capacity of the State. This in turn reduces future employment opportunities.

Additionally, union members live in the communities that suffer the impacts of projects that are detrimental to human health and the environment. Unions have a corresponding interest in acting to minimize the adverse impacts of projects that would degrade the environment, and in enforcing environmental laws to protect their members.

Finally, union members are concerned about projects that cause serious environmental harm without providing countervailing economic benefits. The Energy Commission's AFC process provides for a balancing of the project's socioeconomic and environmental impacts. CURE's ultimate position and participation 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 all prior 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.

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: January 10, 2002

Respectfully submitted,



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