

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

DOCKET

09-AFC-9

DATE DEC 09 2009

RECD. DEC 10 2009

In the Matter of:

The Application for Certification for the
Ridgecrest Solar Power Project

Docket No. 09-AFC-9

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

December 9, 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 Ridgecrest Solar Power Project proposes the construction, maintenance, and operation of a 250 megawatt (“MW”) solar electric generating facilities in Kern 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 Ridgecrest Solar Power 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.

**PROOF OF SERVICE LIST
Ridgecrest Solar Power Project**

Docket No. 09-AFC-9

Nicole Tenenbaum
Senior Project Manager
1625 Shattuck Avenue, Suite 270
Berkeley, CA 94709-1161
tenenbaum@solarmillennium.com

California ISO
e-recipient@caiso.com

Elizabeth Copley
AECOM Project Manager
2101 Webster Street, Suite 1900
Oakland, CA 94612
elizabeth.copley@aecom.com

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

Scott Galati, Esq. Galati/Blek, LLP
455 Capitol Mall, Suite 350
Sacramento, CA 95814
sgalati@gb-llp.com

JULIA LEVIN
Commissioner and Associate
jlevin@energy.state.ca.us

Peter Weiner
Matthew Sanders
Paul, Hastings, Janofsky & Walker LLP
55 2nd Street, Suite 2400-3441
San Francisco, CA 94105
peterweiner@paulhastings.com
matthewsanders@paulhastings.com

Raoul Renaud Hearing Officer
rrenaud@energy.state.ca.us

Eric Solorio Project Manager
esolorio@energy.state.ca.us

Jared Babula Staff Counsel
jbabula@energy.state.ca.us

Public Adviser
publicadviser@energy.state.ca.us