

Bill Powers, P.E.
Powers Engineering
4452 Park Blvd., Suite 209
San Diego, CA 92116

California Energy Commission
DOCKETED
11-AFC-1
TN # 66081
JUL 05 2012

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:) 11-AFC-01
)
Pio Pico Energy Center) **PETITION TO INTERVENE**
)
_____)

1. Petitioner, Bill Powers, P.E., hereby petitions to intervene in the above-captioned proceeding.

2. Petitioner will be represented in this proceeding by:

Self Counsel Group Member
(**NOT Required)

Contact information for representative, as noted above:

Name: Bill Powers, P.E.
Address: 4452 Park Blvd., Suite 209, San Diego, CA 92116
Telephone: (619) 295-2072
E-Mail: bpowers@powersengineering.com

3. Petitioner is, is not, a member of a group or organization already a party to this proceeding.

4. Petitioner seeks to intervene in this proceeding because [*state grounds for intervening; reason for interest; the extent to which the petitioner desires to participate in the proceeding:*

a) failure of the CEC to follow the Energy Action Plan loading order in its analysis of alternatives; b) failure of CEC to conduct detailed analysis of rooftop solar as alternative the in FSA consistent with the CEC determination re rooftop solar in the 2009 denial of 100 MW CVEUP; c) failure of CEC to determine solar resource availability in top 100 demand hours or to corroborate whether Pio Pico can assure 98+% availability; d) failure of CEC to evaluate low cost demand response alternatives to Pio Pico, including but not limited to Ice Bear thermal storage units used extensively by public utilities in Southern California; e) failure of CEC to establish that the ancillary services to be provided by Pio Pico cannot be met by peak load reduction measures (DR, rooftop PV) or energy/thermal storage, or why the ancillary services issue eliminates rooftop solar from consideration in the case of Pio Pico but did not in the case of the CVEUP.

5. Petitioner agrees, does not agree that if a document is served upon me via email, an additional paper copy by mail is not necessary.

7/4/12
Date

Bill Powers, P.E.
Signature

Proof of Service and Declaration of Service attached.

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:) 11-AFC-01
)
Pio Pico Energy Center) **DECLARATION OF SERVICE**
)
_____)

I, Bill Powers, P.E., declare that on July 4, 2012, I served and filed copies of the attached **Petition to Intervene**, accompanied by a copy of the most recent *Proof of Service* list (most recent version is located on the proceeding's web page) with the Docket Unit OR with the presiding committee member of the proceeding. The document has been sent to the Commission AND the applicant, as well as the other parties in this proceeding (as shown on the *Proof of Service* list), in the following manner:

(Check all that Apply)

FOR SERVICE TO THE APPLICANT AND ALL OTHER PARTIES:

sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery or by depositing in the United States mail at [location: city and state] with first-class postage thereon fully prepaid and addressed as provided on the *Proof of Service* list above to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

_____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION	-or-	CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 11-AFC-01		Presiding Member _____
1516 Ninth Street, MS-4		1516 Ninth Street
Sacramento, CA 95814-5512		Sacramento, CA 95814-5512
		Re: Docket No. [____-AFC-____]

docket@energy.state.ca.us

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

Bill Powers, P.E.

Name

7/4/12

Date