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STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE HIDDEN HILLS SOLAR
ELECTRIC GENERATING SYSTEM
(SEGS)

DOCKET NO. 11-AFC-2

DOCKET 11-AFC-2
DATE DEC 15 2011
RECD. DEC 16 2011

**PETITION TO INTERVENE BY
THE CENTER FOR BIOLOGICAL DIVERSITY**

December 15, 2011

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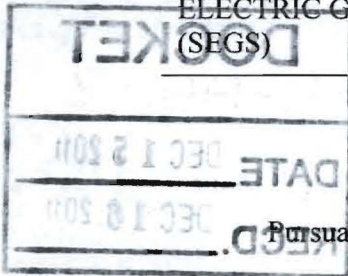
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APPLICATION FOR CERTIFICATION
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Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulations, the Center for Biological Diversity petitions to intervene in this proceeding.

The Center for Biological Diversity is a nonprofit organization whose mission is to protect imperiled species and their habitats through science, policy and environmental law. For more than a decade, the Center for Biological Diversity has worked to conserve and recover the rare, imperiled, and threatened and endangered species in the California deserts. The Center has advocated for protections for the desert tortoise, Mojave fringe-toed lizard, golden eagle, migratory birds, bighorn sheep, rare endemic desert fish, and many other imperiled species in the California deserts on public and private lands in order to reduce impacts to species and habitats from development, vehicles, predation, and other threats to these fragile desert ecosystems. The Center for Biological Diversity has also participated in the approval process for many site-specific projects and in the planning processes for public and private lands throughout California including in Inyo County where the proposed project is found.

The Center is currently an intervenor in one other active proceeding before the

Commission for large-scale solar projects in the California desert. The project at issue in this matter will directly impact many desert resources including, but not limited to, the desert tortoise, other imperiled plants and wildlife, and scarce water resources.

The interests of the board, staff, and members of the Center for Biological Diversity are directly affected by the project at issue in this matter. These immediate interests include, but are not limited to, protection of the desert tortoise, conservation of migratory birds and other avian species, conservation of rare and imperiled native plants, conservation of other wildlife species found in the project area, conservation and protection of water resources and water quality, and cumulative impacts to these and other desert resources.

The Center for Biological Diversity wishes to participate fully in all phases of this proceeding. Filings should be served on Lisa Belenky and Ileene Anderson at the addresses listed below. Email service is preferred.

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This petition to intervene is timely and in keeping with the schedule set for this matter which is still at an early stage of the proceedings and no Notice of Prehearing

Conference has yet been issued. The Center's Ilene Anderson participated in the Commission-sponsored site visit for this proposed project on November 3, 2011.

For the foregoing reasons, the Center for Biological Diversity respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow the Center for Biological Diversity to participate as a party.

Dated: December 15, 2011

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Lisa T. Belenky", is written over a horizontal line.

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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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1-800-822-6228 – WWW.ENERGY.CA.GOV

**APPLICATION FOR CERTIFICATION
FOR THE *HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM PROJECT*
HIDDEN HILLS SOLAR HOLDINGS, LLC**

DOCKET NO. 11-AFC-2
PROOF OF SERVICE
(Revised 11/21/2011)

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*indicates change

DECLARATION OF SERVICE

I, Lisa T. Beekley, declare that on, Dec. 15, 2011, I served and filed copies of the attached CBD Pet to Intervene, dated Dec. 15, 2011. The original document, filed with the Docket Unit or the Chief Counsel, as required by the applicable regulation, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [\[www.energy.ca.gov/sitingcases/hiddenhills/index.html\]](http://www.energy.ca.gov/sitingcases/hiddenhills/index.html).

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- ☒ Served electronically to all e-mail addresses on the Proof of Service list;
- ☒ Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses NOT marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- ☒ by sending an original paper copy and one electronic copy, mailed with the U.S. Postal Service with first class postage thereon fully prepaid and e-mailed respectively, to the address below (preferred method); *OR*
- ☐ by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 11-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- ☐ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
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mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Lisa T. Beekley