

STATE OF CALIFORNIA
**Energy Resources Conservation
and Development Commission**

California Energy Commission

DOCKETED
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APPLICATION FOR CERTIFICATION
FOR THE QUAIL BRUSH
GENERATION PROJECT

DOCKET NO. 11-AFC-03

**PETITION TO INTERVENE BY
PRESERVE WILD SANTEE AND
THE CENTER FOR BIOLOGICAL DIVERSITY**

July 2, 2012
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Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulations, Preserve Wild Santee and the Center for Biological Diversity petition to intervene in this proceeding.

Preserve Wild Santee is a volunteer community environmental organization that has worked to protect and enhance the quality of life and preserve natural resources in the City of Santee and adjoining areas since 1994. Preserve Wild Santee's members offer input into local land use decisions in an effort to produce better development projects with fewer environmental and fire safety impacts. Preserve Wild Santee has also provided comments regarding the Quail Brush Generation Project (the "Project") to the City of San Diego Planning Commission.

Preserve Wild Santee members use the Project site, surrounding areas, and areas that may be affected by Project emissions for aesthetic, recreational, wildlife viewing, and educational purposes, and intend to continue this use as permitted. Preserve Wild Santee and its members are and will be directly, adversely, and irreparably affected by the Project. Preserve Wild Santee's and its members' affected interests include:

preserving and enhancing open space; minimizing fire risks to the public and the environment; protecting rare wildlife including the Quino checkerspot butterfly; conserving native plants and vegetation; protecting, enhancing, and restoring the region's vernal pools; avoiding nitrogen deposition on the Project site and nearby areas; avoiding noise pollution; and maintaining recreational opportunities at Mission Trails Regional Park and elsewhere.

Preserve Wild Santee wishes to participate fully in all phases of this proceeding. Filings should be served on Van Collinsworth at the address listed below. Email service is preferred.

Van Collinsworth
Preserve Wild Santee
9222 Lake Canyon Road
Santee, CA 92071
Phone: (619) 258-7929
Fax: (619) 258-7929
Email: SaveFanita@cox.net

The Center for Biological Diversity (the "Center") is a nonprofit corporation whose mission is to protect imperiled species and their habitats through science, policy and environmental law. The Center, including its predecessor, the Southwest Center for Biological Diversity, has been active in carrying out this mission in San Diego County for more than fifteen years. The Center has advocated for protections for the Quino checkerspot butterfly, Hermes copper butterfly, San Diego fairy shrimp, Riverside fairy shrimp, and many other imperiled wildlife and plant species found in the region including in and around the Project area. The Center has commented on numerous land use projects in the City of San Diego and the City of Santee, and has participated in the approval process for several proposed energy projects that may affect sensitive species

and their habitats.

The interests of the Center's board, staff, and members are and will be directly affected by the Project. These interests include conservation and recovery of rare wildlife, including the Quino checkerspot butterfly, found in and near the Project area; conservation of rare native plants found in and near the Project area; reduction in emissions of greenhouse gas and other air pollutants; and avoiding deposition of nitrogen compounds and other pollutants on the Project site and nearby lands.

The Center wishes to participate fully in all phases of this proceeding. Filings should be served on John Buse and Aruna Prabhala at the addresses listed below. Email service is preferred.

John Buse
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Email: aprabhala@biologicaldiversity.org

This petition to intervene is timely and consistent with the revised schedule set for this matter by Scheduling Order dated June 21, 2012. The proceedings are still at an early stage and no Prehearing Conference date has been set.

For the foregoing reasons, Preserve Wild Santee and the Center for Biological Diversity respectfully request that the Commission grant their petition to intervene in this

proceeding, and allow both Preserve Wild Santee and the Center for Biological Diversity to participate fully as parties to this proceeding.

Dated: July 2, 2012

Respectfully Submitted,



Aruna Prabhala
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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
FOR THE *QUAIL BRUSH GENERATION PROJECT*

DOCKET NO. 11-AFC-03
PROOF OF SERVICE
(Revised 6/6/2012)

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DECLARATION OF SERVICE

I, Aruna Prabhala, declare that on July 2, 2012, I served and filed a copy of the Petition to Intervene dated July 2, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: <http://www.energy.ca.gov/sitingcases/quailbrush/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 electronic copy to the e-mail 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-03
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

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
1516 Ninth Street MS-14
Sacramento, CA 95814
michael.levy@energy.ca.gov

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.

