

DOCKET

08-AFC-5

DATE NOV 11 2008

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STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

The Application for Certification for the
SES Solar Two Project by SES Solar
Two, LLC

Docket No. 08-AFC-5

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

November 11, 2008

Paul F. Foley
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
pfoley@adamsbroadwell.com

On behalf of the CALIFORNIA UNIONS
FOR RELIABLE ENERGY

STATE OF CALIFORNIA

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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 construct and operate power plants in California. Thus, the project directly affects the union members' immediate economic interests.

The project also affects the union members' long-term economic and environmental interests. Environmental degradation jeopardizes future jobs by causing construction moratoriums, depleting limited air pollutant emissions offsets, using limited fresh water, and putting other 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.

Union members are concerned about projects that cause serious environmental harm without providing countervailing economic benefits. The Commission's application process provides for a balancing of the project's socioeconomic 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 many 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.

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: November 11, 2008 Respectfully submitted,

_____/s/_____
Paul F. Foley
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
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On behalf of the CALIFORNIA UNIONS
FOR RELIABLE ENERGY

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PROOF OF SERVICE

I, Bonnie Heeley, declare that on November 11, 2008, I deposited copies of the attached PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY in the United States mail at South San Francisco, California, with first class postage thereon fully prepaid and addressed to the following:

CALIFORNIA ENERGY COMMISSION Attn: Docket 08AFC5 1516 Ninth Street MS15 Sacramento, CA 95814-5512	Robert B. Linden, Executive Vice President SES Solar Two, LLC 2920 E. Camelback Road, Suite 150 Phoenix, AZ 85016	Christine Henning SES Solar Two, LLC 2920 E. Camelback Road, Suite 150 Phoenix, AZ 85016
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Transmission via electronic mail on the following was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list.

Via email to:

- docket@energy.state.ca.us
- Angela_Leiba@urscorp.com
- Allanori@comcast.net
- e-recipient@caiso.com
- lkastoll@ca.blm.gov
- jim_stobaugh@blm.gov
- jbyron@energy.state.ca.us
- jpfannen@energy.state.ca.us
- rrenaud@energy.state.ca.us
- cholmes@energy.state.ca.us

cmeyer@energy.state.ca.us
publicadviser@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, California, on November 11, 2008.

_____/s/_____
Bonnie Heeley

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL. (650) 589-1660

FAX (650) 589-5062

bheeley@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4715

TEL. (916) 444-6201

FAX (916) 444-6209

DANIEL L. CARDOZO
THOMAS A. ENSLOW
PAUL F. FOLEY*
TANYA A. GULESSERIAN
MARC D. JOSEPH
RACHAEL E. KOSS
LOULENA A. MILES
GLORIA D. SMITH

OF COUNSEL
THOMAS R. ADAMS
ANN BROADWELL

*Licensed in New York only

November 11, 2008

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-5

1516 Ninth Street, MS-15

Sacramento, CA 95814-5512

Re: SES Solar Two Project, Docket 08-AFC-5

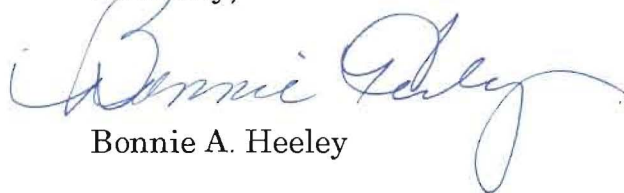
Dear Docket Clerk:

Enclosed are an original and two copies of CURE's Petition to Intervene.
Please process the document and return a conformed copy in the envelope enclosed.

This document has previously been emailed to the Docket Office.

Thank you for your assistance.

Sincerely,



Bonnie A. Heeley

:bah
Enclosures