

California Native Plant Society  
2707 K. Street, Suite 1  
Sacramento, CA  
95816-5113

**DOCKET**

**08-AFC-5**

DATE MAR 25 2010

RECD. APR 01 2010

STATE OF CALIFORNIA  
State Energy Resources  
Conservation and Development Commission

In the Matter of: )  
Imperial Valley )  
Solar Project ) **PETITION TO INTERVENE**

08-AFC-5

1. Petitioner, the California Native Plant Society, hereby petitions to intervene in the above-captioned proceeding.

2. Petitioner will be represented in this proceeding by:

Self  Counsel  Group Members  
(\*NOT Required)

Contact information for representatives, as noted above:

Name: Greg Suba, Tara Hansen  
Address: 2707 K Street, Suite 1 Sacramento CA 95816-5113  
Telephone: 916-447-2677  
E-Mail: gsuba@cnps.org, thansen@cnps.org

Name: Tom Beltran  
Address: PO Box 501671 San Diego, CA 92150  
Telephone: 760-450-8317  
E-Mail: cnpsdd@nyms.net

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

4. Petitioner seeks to intervene in this proceeding because:

The California Native Plant Society (CNPS) wants to ensure that California native rare plant species and plant communities are adequately identified on the proposed project site, and that potential project impacts are adequately addressed under CEQA. We feel this project application is moving forward in advance of identification of impacts to native plants and plant communities. We question how Evidentiary Hearings, scheduled to begin on April 1 while botanical surveys to assess project impacts to rare plants are scheduled for the following week, can reasonably address project impacts and mitigation to plants.

CNPS wishes to participate in the proceedings in order to ensure that potential direct, indirect, and cumulative impacts of the proposed ISEGS project on the viability of desert plant habitat are fully evaluated, that project alternatives that address plant habitat conservation are developed and, if implemented, that appropriate mitigation is required.

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

3/25/10

Date

Greg Suba

Signature

**x Proof of Service and Declaration of Service attached.**



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  
IMPERIAL VALLEY SOLAR PROJECT**  
(formerly known as SES Solar Two Project)  
**IMPERIAL VALLEY SOLAR, LLC**

**Docket No. 08-AFC-5  
PROOF OF SERVICE**  
(Revised 3/9/10)

**APPLICANT**

Richard Knox  
Project Manager  
SES Solar Two, LLC  
4800 N Scottsdale Road.,  
Suite 5500  
Scottsdale, AZ 85251  
[richard.knox@iesserasolar.com](mailto:richard.knox@iesserasolar.com)

**CONSULTANT**

Angela Leiba, Sr. Project  
Manager URS Corporation  
1615 Murray Canyon Rd.,  
Suite 1000  
San Diego, CA 92108  
[Angela\\_Leiba@urscorp.com](mailto:Angela_Leiba@urscorp.com)

**APPLICANT'S COUNSEL**

Allan J. Thompson  
Attorney at Law  
21 C Orinda Way #314  
Orinda, CA 94563  
[allanori@comcast.net](mailto:allanori@comcast.net)

Ella Foley Gannon, Partner  
Bingham McCutchen, LLP  
Three Embarcadero Center  
San Francisco, CA 94111  
[ella.gannon@bingham.com](mailto:ella.gannon@bingham.com)

**INTERESTED AGENCIES**

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

Daniel Steward, Project Lead  
BLM – El Centro Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
[daniel\\_steward@ca.blm.gov](mailto:daniel_steward@ca.blm.gov)

Jim Stobaugh,  
Project Manager &  
National Project Manager  
Bureau of Land Management  
BLM Nevada State Office  
P.O. Box 12000  
Reno, NV 89520-0006  
[jim\\_stobaugh@blm.gov](mailto:jim_stobaugh@blm.gov)

**INTERVENORS**

California Unions for Reliable  
Energy (CURE)  
c/o Tanya A. Gulesserian  
Loulena Miles, Marc D. Joseph  
Adams Broadwell Joseph &  
Cardozo  
601 Gateway Blvd., Ste. 1000  
South San Francisco, CA 94080  
[tgulesserian@adamsbroadwell.com](mailto:tgulesserian@adamsbroadwell.com)  
[lmiles@adamsbroadwell.com](mailto:lmiles@adamsbroadwell.com)

**ENERGY COMMISSION**

JEFFREY D. BYRON  
Commissioner and Presiding  
Member  
[jbyron@energy.state.ca.us](mailto:jbyron@energy.state.ca.us)

ANTHONY EGGERT  
Commissioner and Associate  
Member  
[aeggert@energy.state.ca.us](mailto:aeggert@energy.state.ca.us)

Raoul Renaud  
Hearing Officer  
[renaud@energy.state.ca.us](mailto:renaud@energy.state.ca.us)

Kristy Chew, Adviser to  
Commissioner Byron  
[kchew@energy.state.ca.us](mailto:kchew@energy.state.ca.us)

Caryn Holmes, Staff Counsel  
Christine Hammond,  
Co-Staff Counsel  
[cholmes@energy.state.ca.us](mailto:cholmes@energy.state.ca.us)  
[chammond@energy.state.ca.us](mailto:chammond@energy.state.ca.us)

Christopher Meyer  
Project Manager  
[cmeyer@energy.state.ca.us](mailto:cmeyer@energy.state.ca.us)

Jennifer Jennings  
Public Adviser  
[publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)

**DECLARATION OF SERVICE**

I, Greg Smith, declare that on 3/25, 2010, I served and filed copies of the attached, Relation to Intervene, and J, dated, 3/25, 2010. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [\[http://www.energy.ca.gov/sitingcases/solartwo/index.html\]](http://www.energy.ca.gov/sitingcases/solartwo/index.html).

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**FOR SERVICE TO ALL OTHER PARTIES:**

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date, for mailing with the United States 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 "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**

Attn: Docket No. 08-AFC-5  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury 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.

